



Precious Metals  
Consortium



# EPMF Board & PMC Management Committee

24 April 2018 | Meeting



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# 1. Welcome and introduction

# Confidentiality and competition law



DO	DON'T
<u>Application of competition law</u>	
Art. 101 and 102 TFEU may be applicable to the conclusion of any preliminary agreement and activities of any preliminary phase.	Don't assume that conflicts with competition law are excluded simply by the fact that the Agreement complies with the provisions of the REACH Regulation.
<u>Consultation in Matters of Competition Law</u>	
Consult an in-house legal expert or the compliance officer of your company or an external lawyer whenever there are uncertainties respecting compliance with competition law. Stop all meetings/discussions which are not in compliance with these Compliance Guidelines until a legal expert has been involved.	Don't assume that these Compliance Guidelines deal with all competition law issues exhaustively. Basically, compliance with Art. 101 and 102 TFEU can be determined only on the basis of market impact in each individual case. These Compliance Guidelines may therefore be regarded only as a means of providing general conduct recommendations.
<u>Activities in any preliminary phase and at any other stage of operation of the Consortium</u>	
Restrict cooperation within the scope of the preliminary phase to the initially defined goals and purposes of the cooperation.	Pursuant to Art. 101 and 102 TFEU, activities which have the object or the effect of preventing, restricting and/or distorting competition are prohibited within the scope of this Agreement, including: <ul style="list-style-type: none"> <li>- Coming to agreement, including arrangements or collusions, about prices, markets and customers (see Art. 101 paragraph 1 a)-e) TFEU);</li> <li>- Joint boycotting of other companies;</li> <li>- The unjustified unequal treatment of trade partners;</li> <li>- The abusive exploitation of a dominating market position.</li> </ul>
<u>Exchange of Confidential Information</u>	
Involve a Trustee for the exchange of Confidential Information.	The exchange of Information concerning market behaviour and having the object or the effect of preventing, restricting and/or distorting competition is inadmissible; in particular, this relates to : <ul style="list-style-type: none"> <li>- Production capacities;</li> <li>- Productions or sales volumes;</li> <li>- Import volumes;</li> <li>- Market shares;</li> <li>- Price policy;</li> <li>- Distribution and marketing terms;</li> <li>- Marketing strategies;</li> <li>- Information regarding the relationship with suppliers.</li> </ul>
<u>Documentation on Cooperation</u>	
Keep minutes of all meetings which detail the subject of the meeting. In case of uncertainty, have the contents of the minutes reviewed by an external legal expert prior to sending them to all parties of the Agreement. Stop all meetings which are not in compliance with these Guidelines until a legal expert has been involved.	



## Tour de table, quorum and apologies



### **EPMF Board:**

Wilfried Held, Fachvereinigung Edelmetalle (Germany)

Cédric Léger, ASFCMP (Switzerland)

Egbert Lox, Umicore (Belgium)

### **Apologies**

Mark Bedford, Johnson Matthey (UK)

### **PMC Management Committee:**

Francisco Boo, Metalor (Switzerland)

Wouter Ghyoot, Umicore (Belgium) (*replacing Guy Ethier*)

Heinz-Günter Schenzel, C. Hafner (Germany)

Dorothea Annette Steiger, Heraeus (Germany)

Holger Zitt, BASF (Germany)

### **Apologies**

Guy Ethier, Umicore (Belgium)

Joern Muehlenfeld, Aurubis (Germany)

Juha Parkkinen, Norilsk Nickel (Finland)

Nissanka Rajapakse, Johnson Matthey (UK)

### **EPMF/PMC Legal counsel**

Sonia Ali, K&L Gates (Belgium)

### **EPMF/PMC Secretariat:**

France Capon, EPMF (Belgium)

Audrey Rondepierre, EPMF (Belgium)

**Quorum is reached**

# Approval of agenda



1. Welcome and Introduction
  - Confidentiality and Competition Law
  - Tour de table, quorum and apologies
  - Approval of the agenda
  - Review of the actions and approval of the minutes of previous PMC meeting (20 February 2018) and EPMF meeting (27 March 2018)
  
2. Preparation of the PMC and EPMF GA
  - EPMF-PMC 2017 audited accounts – for recommendation
  - Restructuration status and process during the Assemblies meetings – for recommendation
  - New EPMF members
  - EPMF Board members and Financial controller
  - EPMF-PMC 2019 draft workplan – for information
  
3. 2018 Workplan status
  - Status of 2018 EPMF and PMC Accounts – for information
  - Silver EOGRTs TPs – for information
  - Pt genotox testing program – for information
  - Knowledge Management Tool – for information
  - EPMF Risk Register development – for information
  
4. Eurometaux structure: ongoing review
  
5. 2018 Data sharing status
  - LoA status – for information
  - ESTF request regarding sub-licensing – for decision
  
6. A.O.B. and closure of the meeting

**FOR APPROVAL**

## Approval of minutes of previous meeting



Management Committee meeting (20 February 2018)

Actions	By when	By who	Status
Send to the Management Committee the detailed table with the reserves, incomes, etc.	End of February 2018	AR	<b>DONE</b>
Contact CBC to launch the Actiflex program and receive an updated offer to be sent for final approval to the Management Committee and the EPMF President	February 2018	FC	<b>DONE</b>
Review reserves and calculation of minimum amount needed	December 2018	EPMF Board	
Triammonium hexachlororhodate: Organise a written procedure with the Assembly	February 2018	FC	<b>DONE</b>
Triammonium hexachlororhodate: inform Vale and ensure that PMC is recognized at ECHA as data holders	March 2018	FC	<b>ONGOING</b>
Discuss companies comments with the lawyer and address them with companies	15 March 2018	FC	<b>DONE</b>

**FOR APPROVAL**

## Approval of minutes of previous meeting



Management Committee meeting (20 February 2018)

Actions	By when	By who	Status
Send a template to be signed by companies to officially confirmed their intention to join or approve new Articles of Association	End of February 2018	AR	<b>DONE</b>
Send back the filled in template to secretariat	15 March 2018	Companies	<b>ONGOING</b>
Finalize new visual identity	27 March 2018	EPMF Board	<b>DONE</b>
Launch request for chairs and co-chairs for SVHC, PGM, Ag WG	February 2018	FC	<b>DONE</b>
Amend the Action plan for the restructuring based on Management Committee comments	February 2018	FC/K&L Gates	<b>DONE</b>
Prepare a package for the approval by the Assembly with the final version of the baseline reports, the charter and rolling, as a one-pager on the benefits to contribute to MISA (including PM specific examples)	March 2018	FC	<b>DELAYED</b>
Request approval of the EPMF President to use already EPMF to commit to MISA	March 2018	FC	<b>DONE</b>

**FOR APPROVAL**

## Approval of minutes of previous meeting



EPMF Board (27 March 2018)

Actions	Who ?	When?	Status
Send to EPMF Board the background documents from the bank	FC	April 2018	<b>DONE</b>
Prepare with K&L Gates a note on the conditions of moving from PMC membership to LoA (to be signed before December 2018) and also joining EPMF after 31st October 2018	FC	April 2018	<b>ONGOING</b>
Ask Cédric Léger to clarify with Cendres & Métaux the consequences of not joining EPMF	FC	April 2018	<b>DONE</b>
Send the draft agenda and proxy to EPMF members and EPMF members candidates ensuring an intermediate milestone to submit the requested documents (Early May 2018)	FC	Early April 2018	<b>DONE</b>

**FOR APPROVAL**



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## 2. Preparation of the PMC and EPMF GA

## 2017 Audited accounts - EPMF



		2017 Budget	Expenses by 31/12/2017	Difference Budget- Expenses
<b>2.1</b>	<b>Administrative costs</b>	<b>€ 167.200</b>	<b>€ 162.520</b>	<b>€ 4.680</b>
2.1.1	Salaries and salary-related costs	€ 43.400	€ 38.239	€ 5.161
2.1.2	Office costs	€ 8.700	€ 13.421	-4.721,00
2.1.3	Meeting, travel and accomodation costs	€ 16.500	€ 5.428	€ 11.072
2.1.4	External costs:	€ 98.600	€ 105.432	-6.832,00
	<i>Eurométaux membership fee</i>	€ 85.000	€ 81.270	3.730,00
	<i>Liability Insurance</i>	€ 1.400	€ 1.214	186,00
	<i>Legal support</i>	€ 6.000	€ 17.240	-11.240,00
	<i>Accountancy and audits</i>	€ 4.200	€ 4.345	-145,00
	<i>Chem-Watch Asia Hub</i>	€ 2.000	€ 1.363	637,00
<b>2.1bis</b>	<b>Projects</b>	<b>€ 35.000</b>	<b>€ 13.267</b>	<b>€ 21.733</b>
	<i>Tax Committee</i>	€ 0	€ 0	€ 0
	<i>Trade Committee</i>	€ 0	€ 0	€ 0
	<i>EHS Committee</i>	€ 20.000	€ 4.352	€ 15.648
	<i>Sustainability and Raw materials Committee</i>	€ 0	€ 0	€ 0
	<i>Advocacy network</i>	€ 15.000	€ 8.915	€ 6.085
<b>2.1tris</b>	<b>Building reserves</b>	<b>€ 30.000</b>	<b>€ 0</b>	<b>€ 30.000</b>
	<b>TOTAL</b>	<b>€ 232.200</b>	<b>€ 175.787</b>	<b>€ 56.413</b>

## 2017 Audited accounts - PMC



		2017 Budget to be spent	2017 Budget to be invoiced	Expenses by 31/12/2017	Committed Expenses by 31/12/2017	TOTAL Expenses by 31/12/2017 + Committed	Remaining available budget (2017 budget- Expenses- Committed)	Simulation of 2017 collected money to be added to the reserves
2.1	Administrative costs	€ 617.250	€ 617.250	€ 558.909	€ 64.160	€ 623.069	€ -5.819	€ -5.819
2.2	Ag-applicable costs	€ 897.550	€ 862.550	€ 448.903	€ 72.208	€ 521.111	€ 376.439	€ 376.439
2.3	Au-applicable costs	€ 355.200	€ 201.200	€ 134.280	€ 3.752	€ 138.032	€ 217.168	€ 217.168
2.4	PM CN- applicable costs	€ 72.700	€ 64.200	€ 84.489	€ 4.172	€ 88.661	-€ 15.961	-€ 15.961
2.5	PGM- applicable costs							
2.5a	Pt-applicable costs	€ 763.900	€ 738.400	€ 398.013	€ 365.887	€ 763.900	€ -0	€ 0
2.5b	Pd-applicable costs	€ 25.200	€ 25.200	€ 51.036	€ 288.683	€ 339.719	-€ 314.519	-€ 1.847
2.5c	Rh-applicable costs	€ 171.050	€ 153.550	€ 130.720	€ 55.330	€ 186.050	-€ 15.000	€ -15.000
2.5d	Ru-applicable costs	€ 501.700	€ 435.200	€ 229.350	€ 50.112	€ 279.462	€ 222.238	€ 222.238
2.5e	Ir-applicable costs	€ 13.850	€ 13.850	€ 13.919	€ 0	€ 13.919	€ -69	€ -69
2.6	Re-applicable costs	€ 7.400	€ 7.400	€ 4.947	€ 2.000	€ 6.947	€ 453	€ 453
2.7	Refinables-applicable costs	€ 772.700	€ 75.200	€ 27.895	€ 0	€ 27.895	€ 744.805	€ 744.805
2.8	SVHC Roadmap-applicable costs	€ 81.250	€ 61.250	€ 20.635	€ 0	€ 20.635	€ 60.615	€ 60.615
2.9	Ag Water Framework Directive costs	€ 100.000	€ 100.000	€ 54.761	€ 45.239	€ 100.000	€ 0	€ 0
	<b>TOTAL</b>	<b>€ 4.379.750</b>	<b>€ 3.355.250</b>	<b>€ 2.157.857</b>	<b>€ 951.544</b>	<b>€ 3.109.402</b>	<b>€ 1.270.348</b>	<b>€ 1.583.021</b>



## Restructuration status and process during the GA



	become a member A <sup>(1)</sup> [OR] B <sup>(2)</sup> of EPMF	Become a member of the Board
Affinor	1	0
ASFCMP	1	1
ASSOMET	1	0
Fachvereinigung Edelmetalle	1	1
•Agnico-Eagle	No reply	
•Ames Goldsmith U.K.	1	0
•Anglo	Reminder 9-16 March	
•Argor-Heraeus	Affiliate of Heraeus	
•Aurubis	1	1
•BASF	1	1
•Boliden	1	0
•C. Hafner	1	1
•Cendres + Métaux	0	0
•Chimet	Wait for 2019 fee	
•Climax Molybdenum	1	0
•Cri Criterion	No reply	
•Doduco	1	0
•Du Pont UK	1	0
•Ferro	No reply	
•Glencore	1	0
•Handy & Harman	No reply	
•HCM	1	0
•Heimerle + Meule	1	0
•Heraeus	1	1
•Johnson Matthey	1	0
•KCM AD	1	0
•Metraco	Affiliate of KGHM	
•KGHM Polska Miedz	1	1
•Krastsvetmet	1	0
•Lipmann Walton & Co.	Wait for clarity on Brexit	
•Metalor	1	1
•Montanwerke-Brixlegg	0	0
•Norilsk Nickel	1	0
•PAMP	Wait for 2019 fee	
•PX Group	1	0
•Recylex	0	0
•Safimet	1	0
•Saft	1	1
•Saxonia	1	1
•Tanaka Kikinzoku Kogyo	1	0
•Traxys Europe	No reply except questions	
•Umicore	1	1
•Valcambi	1	0
•Vale	0	0
•Varinor	1	1
<b>TOTAL</b>	<b>30</b>	<b>12</b>

## Restructuration status and process during the GA



New EPMF Members A	
1.	<b>Aurubis AG</b>
2.	<b>BASF SE</b>
3.	<b>Climax</b>
4.	<b>Du Pont</b>
5.	<b>Glencore</b>
6.	<b>HCM</b>
7.	<b>Doduco</b>
8.	<b>KCM</b>
9.	<b>Krastvetmet (Norilsk Nickel)</b>
10.	<b>Metalor</b>
11.	<b>Norilsk Nickel</b>
12.	<b>PX Group</b>
13.	<b>Safimet</b>
14.	<b>Saft</b>
15.	<b>Saxonia</b>
16.	<b>Tanaka</b>
17.	<b>Valcambi</b>
18.	<b>Varinor</b>

**FOR RECOMMENDATION BY EPMF BOARD TO  
EPMF GA**



# Restructuration status and process during the GA

## Candidates members to the EPMF Board



1. Francisco Boo, Regulatory Affairs Counsel, Metalor Technologies, Switzerland
2. Wouter Ghyoot, Group Director sustainable value chain, Umicore NV/SA, Belgium
3. TBD, Fachvereinigung Edelmetalle, Germany
4. Simona Lai, Chemical Regulatory Compliance Expert, Varinor SA, Switzerland
5. Cédric Léger, President, ASFCMP, Switzerland
6. Jörn Mühlenfeld, REACH Team Leader, Aurubis AG, Germany
7. TBC, KGHM Polska Miedź S.A., Poland
8. Philipp Reisert, Managing Partner, C. Hafner, Germany
9. Clémence Siret, Eco Design & REACH Manager, SAFT, France
10. Dorothea Annette Steiger, Head of REACH, Heraeus Holding, Germany
11. Hans-Christian Winkelmann, CEO, Saxonia Edelmetalle GmbH, Germany (TBC)
12. Holger Zitt, BASF SE, Germany

- Need to propose a President, Vice-President and Treasurer
- Need to propose a Financial Controller (outside of the Board)

**FOR RECOMMENDATION BY EPMF BOARD TO  
EPMF GA**

# Restructuration status and process during the GA



## EPMF Assembly agenda

- Adoption of a new text of the Articles of Association and of the Internal Rules
- Allocation of members as members A or members B
- Enacting the end of the mandate of the current Board of Directors including President, Vice-President and Treasurer
- Admission of new members
- Election of new members to the Board of Directors including President, Vice-President and Treasurer [*and of the Financial Controller*] and waiver to article 5.3.1.2 of the Articles of Association
- Power of attorney for the coordination of the Articles of Association
- Authorization to the Board of Directors to implement the decisions taken
- Power of attorney for formalities
- Approval of the 2017 audited accounts
- Update on EPMF activities
- EPMF 2019 Workplan focused on non-REACH platforms
- Admin news: resignation of Fabio Maggiore

## EPMF 2019 draft work plan



	2019 DRAFT Budget	FTE
<b>Administrative costs</b>	<b>671.200 €</b>	<b>1,9</b>
<b>REACH Platform costs</b>	<b>3.604.991 €</b>	<b>3,73</b>
Ag metal (including nano)	137.071 €	0,50
Ag compounds	178.071 €	0,50
Au metal	22.927 €	0,05
Au compounds	47.997 €	0,10
Ag cyanide/Potassium dicyanoargentate	154.997 €	0,10
Potassium dicyanoaurate	33.000 €	0,05
Pt metal	21.157 €	0,04
Chloroplatinates	271.788 €	0,20
Karstedt	851.788 €	0,20
Pt compounds (others)	404.088 €	0,30
Pd metal	21.157 €	0,04
Pd compounds	257.048 €	0,40
Rh metal	21.157 €	0,04
Rh III compounds	219.088 €	0,30
Rh compounds (others)	178.788 €	0,20
Ru metal	21.157 €	0,04
Ru compounds	60.629 €	0,08
Ir metal	26.157 €	0,04
Ir compounds	67.157 €	0,04
Re metal & compounds	7.209 €	0,01
Refinables	602.558 €	0,50

## EPMF 2019 draft work plan



<b>Non-REACH Platform costs</b>	<b>72.300 €</b>	<b>0,3</b>
<b>SVHC Roadmap</b>	<b>17.300 €</b>	<b>0,10</b>
<b>Silver EQS</b>	<b>0 €</b>	
<b>Chemicals/waste/products Roadmap</b>	<b>10.000 €</b>	<b>0,05</b>
<b>Occupational Health</b>	<b>10.000 €</b>	<b>0,05</b>
<b>Water framework directive and PGMS</b>	<b>0 €</b>	
<b>Responsible sourcing</b>	<b>10.000 €</b>	<b>0,05</b>
<b>Tax</b>	<b>0 €</b>	
<b>Communication &amp; advocacy platform</b>	<b>25.000 €</b>	<b>0,05</b>
<b>GRAND TOTAL</b>	<b>4.348.491 €</b>	<b>5,93</b>

## EPMF 2019 draft work plan



Comments on the platforms:

- Ir metal
  - Ir compounds
  - Ru metal
- } Currently less than 3 interested members BUT some registrants have not yet replied

Options:

- 1) Merge Ru metal and Ru compounds platforms BUT risks related to different challenges of the two groups – not needed if some of the remaining PMC members decide to join EPMF
- 2) Merge Ir metal and Ir compounds platforms – could solve the issue if some of the remaining PMC members decide to join EPMF
- 3) Deviate from the Internal rules

N.B.: in any case, it will be difficult to withdraw these substances from EPMF WP as EPMF has these substances in its scope.

**PREMATURE TO TAKE A DECISION AT THIS STAGE**



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## 3. 2018 Workplan status

## 2018 accounts status - EPMF



		2018 Budget	Expenses by 31/03/2018	Difference Budget-Expenses
1.1	Salaries and salary-related costs	€ 43.400	€ 12.212	€ 31.188
1.2	Office costs	€ 8.700	€ 1.848	6.852,00
1.3	Meeting, travel and accomodation costs	€ 16.500	€ 690	€ 15.810
1.4	External costs:	€ 98.600	€ 45.178	53.422,00
	<i>Eurométaux membership fee</i>	€ 82.300	€ 41.447	40.853,00
	<i>ICMM</i>	€ 2.700	€ 1.738	962,00
	<i>Liability Insurance</i>	€ 1.400	€ 1.155	245,00
	<i>Legal support</i>	€ 6.000	€ 0	6.000,00
	<i>Accountancy and audits</i>	€ 4.800	€ 838	3.962,00
	<i>Chem-Watch Asia Hub</i>	€ 1.400	€ 0	1400,00
1.5	Restructuration	€ 20.000	€ 4.164	€ 15.836
1.6	Risk Register	€ 30.000	€ 0	€ 30.000
	<b>TOTAL</b>	<b>€ 217.200</b>	<b>€ 64.092</b>	<b>€ 153.108</b>



## 2018 accounts status - PMC



	2018 Approved Budget	2018 Cash-out (Approved Budget + Committed by 31/12/2017)	Expenses by 31/03/2018	2018 Committed Expenses	TOTAL Expenses by 31/03/2018 + 2018 Committed	Remaining available cash-out (2018 budget- Expenses-2018 Committed)
Administrative costs	€ 601.700	€ 665.860	€ 125.698	€ 254.320	€ 380.018	€ 285.842
Ag metal (including nano)	€ 937.603	€ 980.603	€ 19.860	€ 110.969	€ 130.829	€ 849.774
Ag compounds	€ 954.103	€ 983.103	€ 20.502	€ 106.284	€ 126.786	€ 856.318
Au metal	€ 48.258	€ 48.258	€ 611	€ 8.706	€ 9.317	€ 38.941
Au compounds	€ 37.008	€ 40.760	€ 1.389	9.966 €	€ 11.355	€ 29.406
Ag cyanide/Potassium dicyanoargentate	€ 14.255	€ 18.427	€ 1.529	€ 7.628	€ 9.157	€ 9.271
Potassium dicyanoaurate	€ 106.010	€ 106.010	€ 682	€ 11.465	€ 12.147	€ 93.863
Pt metal	€ 10.264	€ 10.264	€ 445	€ 2.721	€ 3.166	€ 7.098
Chloroplatinates	€ 59.927	€ 59.927	€ 2.899	€ 22.786	€ 25.685	€ 34.242
Karstedt	€ 50.047	€ 50.047	€ 1.064	€ 16.676	€ 17.740	€ 32.307
Pt compounds (others)	€ 296.393	€ 662.487	€ 11.958	€ 273.201	€ 285.159	€ 377.328
Pd metal	€ 10.097	€ 10.097	€ 209	€ 3.255	€ 3.464	€ 6.633
Pd compounds	€ 700.001	€ 988.834	€ 27.599	€ 902.944	€ 930.543	€ 58.291
Rh metal	€ 8.020	€ 8.020	€ 0	€ 1.770	€ 1.770	€ 6.250
Rh III compounds	€ 203.740	€ 259.235	€ 12.133	€ 74.707	€ 86.840	€ 172.395
Rh compounds (others)	€ 26.140	€ 26.140	€ 1.955	€ 10.435	€ 12.390	€ 13.750
Ru metal	€ 9.627	€ 9.627	€ 209	€ 1.770	€ 1.979	€ 7.648
Ru compounds	€ 55.773	€ 105.885	€ 5.561	€ 40.740	€ 46.301	€ 59.584
Ir metal	€ 6.180	€ 6.180	€ 388	€ 792	€ 1.180	€ 5.000
Ir compounds	€ 27.620	€ 27.620	€ 388	€ 10.232	€ 10.620	€ 17.000
Re metal & compounds	€ 22.325	€ 24.325	€ 2.271	€ 3.453	€ 5.724	€ 18.601
Refinables	€ 55.531	€ 55.531	€ 7.701	€ 30.936	€ 38.637	€ 16.894
SVHC Roadmap	€ 28.600	€ 28.600	€ 2.700	€ 25.900	€ 28.600	€ 0
Silver EQS	€ 20.000	€ 65.239	€ 6.696	€ 29.260	€ 35.956	€ 29.283
<b>TOTAL</b>	<b>€ 4.289.224</b>	<b>€ 5.241.082</b>	<b>€ 254.447</b>	<b>€ 1.960.916</b>	<b>€ 2.215.363</b>	<b>€ 3.025.719</b>



## 2018 Status of PMC reserves



	TOTAL Reserves by 31/12/2017 (4)	End 2018 estimated reserves				
		Use of reserves for 2018 budget (5)	LoA sold in 2018 (draft) (6)	Past dues invoiced and cashed in in 2018 (draft) (7)	LtU sold in 2018 (draft) (8)	TOTAL Estimation reserves end 2018 (9)
<b>Administrative costs</b>	312.730 €					312.730 €
<b>REACH Platform costs</b>	6.310.326 €	226.075 €	758.633 €	159.049 €	0 €	7.001.932 €
Ag metal (including nano)	1.227.978 €		220.121 €	44.394 €		1.492.493 €
Ag compounds	588.337 €		27.392 €	50.252 €		665.981 €
Au metal	251.558 €	48.258 €	83.141 €			286.442 €
Au compounds	46.194 €					46.194 €
Ag cyanide/Potassium dicyanoargentate	184.649 €					184.649 €
Potassium dicyanoaurate	118.234 €					118.234 €
Pt metal	564.116 €	10.264 €	128.017 €			681.869 €
Chloroplatinates	387.866 €					387.866 €
Karstedt	90.292 €		55.540 €			145.832 €
Pt compounds (others)	129.927 €		52.102 €	44.975 €		227.004 €
Pd metal	129.108 €	10.097 €	118.919 €			237.930 €
Pd compounds	24.274 €					24.274 €
Rh metal	100.544 €	8.020 €				92.524 €
Rh III compounds	249.941 €					249.941 €
Rh compounds (others)	125.680 €					125.680 €
Ru metal	227.422 €	9.627 €				217.795 €
Ru compounds	490.818 €	55.773 €				435.045 €
Ir metal	53.938 €	6.180 €				47.758 €
Ir compounds	35.959 €					35.959 €
Re metal & compounds	355.509 €	22.325 €	73.401 €			406.585 €
Refinables	927.982 €	55.531 €		19.428 €		891.878 €
<b>Non-REACH Platform costs</b>	145.514 €	0 €	0 €	0 €		145.514 €
SVHC Roadmap	62.106 €					62.106 €
Silver EQS	0 €					0 €
Hydrazine	83.408 €					83.408 €
<b>GRAND TOTAL</b>	<b>6.768.569 €</b>	<b>226.075 €</b>	<b>758.633 €</b>	<b>159.049 €</b>	<b>0 €</b>	<b>7.460.176 €</b>

## Silver EOGRTs



- Ongoing discussions under Biocides on **classification of active substances**
  - SZZ: Repr cat. 1B proposed, cat. 2 agrees
  - SZ, SCZ and SSZHP: Repr cat. 2 proposed
- **Data gap** on reprotox → PMC submitted **TP for EOGRTS** in 2015
- Since 2015: further research published suggesting Ag is reprotox
  - maybe even Repr cat. 1B → Ag restriction for consumer use and banned in EU from electronics, silverware, medical devices, biocidal use, ...
  - several weaknesses in recent silver research → data gap still remains, but **update of TP** is necessary
- TP now under scrutiny by ECHA who accepted to wait for the update of PMC TP (submitted on 5<sup>th</sup> April 2018) → waiting for Draft Decision in the coming days
- Even if TP accepted: outcome of EOGRTS is highly unpredictable and risk of classification as Repr cat. 1B still exists!



## Pt genotox testing program



- **TAPt dossiers:**
  - Two Umicore NONS substances: ECHA DD received
    - Cmts for TAPt acetate submitted (<6 Nov '17), dossier updated (<7 Dec '17)
    - Cmts for TAPt HCO<sub>3</sub> will be submitted (<29 March '18):
      - Timing for testing (12 mths after ECHA final decision)
      - Read-across: link to discussions under MISA
  - Read-Across justification documents updated
    - “**accepted to be plausible**” by ECHA (cf. DD TAPt HCO<sub>3</sub>)
  - **Protocol considered adequate** by ECHA

## Pt genotox testing program



- **Public consultation**
  - Public consultation done or ongoing:
    - HHPA
    - TAPt dichloride
    - TAPt dinitrate
    - dihydrogen hexachloroplatinate
    - dipotassium hexachloroplatinate
  - Focus = third party input (=no PMC input)
  - To be expected soon: HHPA/2AE (ongoing discussions on SID), 2 hexaClPt, 1 tetraClPt, Pt nitrate
- **Expected timing: Q2 2019** to start the testing program under PMC umbrella (IPA decided to step back at this stage)

## Learnings from EOGRTs and Pt genotox



- Open dialog with ECHA
  - Efficient technical advocacy
  - Efficient on a resource, time and content point of view
  - Important to maintain openness and good relationship to defend PMC registration strategy
- => MISA is the way to do so!

## Knowledge Management Tool



- Already available:
  - **Studies :**
    - *Platinum and compounds*
    - *Iridium and compounds*
    - *Palladium and compounds are ongoing*
  - **Newsletters :** *PMC Reach News, ECHA Newsletters, Eurometaux Chemicals Management News*
- Passwords : will be sent to all members by end of May

## EPMF Risk Register development



- Aim: to help the association to define their priorities in the future and ensure a good tracking of the future regulatory challenges

- In charge: Hanover

- Project steps:



- Final deliverable: a comprehensive risk tracking system consisting of interactive issue sheets for each priority initiative.



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## 4. 2018 Data sharing status

# LoA status



	TOTAL 2010-2013		2016		2017		2018		GRAND TOTAL	
	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €	Nb of sold LoA's	Total in €
<b>Admin fees</b>		<b>808.500,00</b>		<b>Included</b>		<b>Included</b>		<b>Included</b>		<b>808.500,00</b>
<b>Ag</b>	<b>27</b>	<b>741.125,00</b>	<b>0</b>	<b>75.152,00</b>	<b>13</b>	<b>609.502,00</b>	<b>8</b>	<b>247.513,00</b>	<b>48</b>	<b>1.673.292,00</b>
<i>Ag metal</i>	16	390.000,00	<i>Updates</i>	24.802,00	10	471.111,50	7	220.121,00	33	1.106.034,50
<i>Ag nitrate</i>	1	125,00	<i>Updates</i>	6.387,00	1	51.215,00	1	27.392,00	3	85.119,00
<i>Disilver oxide</i>	2	28.500,00	<i>Updates</i>	24.802,00	<i>Updates</i>	1.994,50			2	55.296,50
<i>Ag chloride</i>	4	276.500,00	<i>Updates</i>	6.387,00	1	42.590,50			5	325.477,50
<i>Ag iodide</i>	2	16.000,00	<i>Updates</i>	6.387,00					2	22.387,00
<i>Ag bromide</i>	2	30.000,00	<i>Updates</i>	6.387,00	1	42.590,50			3	78.977,50
<b>Au</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>30.970,00</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>83.141,00</b>	<b>3</b>	<b>114.111,00</b>
<i>Au metal</i>			1	30.970,00			2	83.141,00	3	114.111,00
<b>Pt</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>166.620,00</b>	<b>4</b>	<b>235.659,00</b>	<b>7</b>	<b>402.279,00</b>
<i>Pt metal</i>					2	111.080,00	2	128.017,00	4	239.097,00
<i>Karstedt concentrate</i>					1	55.540,00	1	55.540,00	2	111.080,00
<i>Pt dioxide</i>							1	52.102,00	1	52.102,00
<b>Pd</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>50.791,00</b>	<b>4</b>	<b>118.919,00</b>	<b>8</b>	<b>169.710,00</b>
<i>Pd metal</i>					2	25.395,50	4	118.919,00	6	144.314,50
<i>Pd monoxide</i>					1	24.325,50			1	24.325,50
<i>Disodium tetrachloropalladate</i>					1	1.070,00			1	1.070,00
<b>Refinables</b>	<b>6</b>	<b>63.000,00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>63.000,00</b>
<i>Slags, PM metal</i>	2	21.000,00							2	21.000,00
<i>Flue dust, Ag refining</i>	1	10.500,00							1	10.500,00
<i>Waste solids, PM refining</i>	1	10.500,00							1	10.500,00
<i>Doré</i>	1	10.500,00							1	10.500,00
<i>Slimes and sludges</i>	1	10.500,00							1	10.500,00
<b>Rhenium</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>154.940,00</b>	<b>2</b>	<b>73.401,00</b>	<b>6</b>	<b>228.341,00</b>
<i>Re metal</i>					3	121.398,00	1	36.700,50	4	158.098,50
<i>Ammonium perrhenate</i>					1	33.542,00	1	36.700,50	2	70.242,50
<b>TOTAL</b>	<b>33</b>	<b>1.612.625,00</b>	<b>1</b>	<b>106.122,00</b>	<b>24</b>	<b>981.853,00</b>	<b>20</b>	<b>758.633,00</b>	<b>78</b>	<b>3.459.233,00</b>

**N.B.:** At the beginning of April, the payment of approx. 12 LoAs is still ongoing!  
(not included in above table)

## ESTF request regarding sub-licensing



### Background:

- **April 2016** - The European Silver Task Force in charge of the silver active substances under the biocides regulation requested access to a study owned by PMC members of the Silver Sub-Assembly to support their read-across approach in the silver nitrate biocide dossier.
- **May 2016** - the Management Committee agreed to share this data with ESTF since this is in the benefit of all to use same and good quality data. It was suggested to review the cost of the study and to add a 25 % administration fee on top of the study cost.
- **June 2016** – the Management Committee agreed on the following offer:
  - The cost related to the study has been identified and is of 30.000€.
  - 25% is added for administrative costs (monitoring, legal costs, admin of the Secretariat etc.), this means that the overall costs of the study will be of 37.500€.
  - There is no existing cost sharing formula for such a type of situation.
  - Have a reasonable amount proposed to ESTF (repeating the testing would costs them around 40.000€ now + the costs of the samples and admin.) but it must be worth the effort for PMC.
  - A sum of 5.000€ has been agreed.
- **July 2016:** the proposal was sent to EST
- **March 2017:** The Management Committee agreed that ESTF is able to sub-license this data for other BPR applications paying a royalty of 1000€ by sub-licensing

# ESTF request regarding sub-licensing



## Background:

- **April 2017:** offer was sent to ESTF
- **February 2018** – reply from ESTF asking for no payment of royalties

Proposal: if ESTF does not want to pay royalties, it is recommended to apply the rules proposed in November 2017 for sharing a study with sub-licensing rights but without royalties (1B): 50% of the costs of the study + 25% admin costs

ESTF proposal: 25.000€

**FOR APPROVAL**

Options	Regulatory context	Data to be shared	Costs sharing	Sub-Licensing rights
1	In the EU	Per study	30% + 25% admin costs	No
1A	In the EU	Per study	30% + 25% admin costs + royalties	Yes
1B	In the EU	Per study	50% + 25% admin costs (if no agreement on royalties)	Yes
2	In the EU	Full dossier (without ES)	25% + 25% admin costs	No
2A	In the EU	Full dossier (with ES)	30% + 25% admin costs	No
2B	In the EU	Full dossier (without ES)	25% + 25% admin costs + royalties	Yes
2C	In the EU	Full dossier (with ES)	30% + 25% admin costs (+ royalties)	Yes
3	Outside the EU	Per study	30% + 25% admin costs	No
3A	Outside the EU	Per study	50% + 25% admin costs	Yes
4	Outside the EU	Full dossier (without ES)	25% + 25% admin costs	No
4A	Outside the EU	Full dossier (with ES)	30% + 25% admin costs	No
4B	Outside the EU	Full dossier (without ES)	45% + 25% admin costs	Yes
4C	Outside the EU	Full dossier (with ES)	50% + 25% admin costs	Yes



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## 5. EM structure ongoing review

## Meeting 5<sup>th</sup> April with some EM members



### Aims:

- Reflect about and design the most appropriate post 2018 EHS& REACH structure
- Prepare a proposal that could be discussed in the different relevant EM committees

The participants discussed during this first exchange:

- Expectations members vis-à-vis EM
- Observed trends and possible impacts on EM work
- Observations from the staff of direct relevance for the debate
- Possible ways forward

## Meeting 5<sup>th</sup> April with some EM members



### Expectations from the members

- Work on issues of **common interest**
- Ensure/coordinate **advocacy** and **outreach**
- Provide **platforms** for exchanges/interactions and strive for/ensure **consistency**
- Facilitate **technical work/science/development of methods**
- **Entry gate** to EU structures ('facilitator')
- **Sectorial representation** at ECHA (see notes)
- Be able and prepared to address **overlapping/merging topics/legislative fields** (e.g. Chemicals/Products/Waste, REACH and OSH etc.)
- Support **sectorial approach**

## Meeting 5<sup>th</sup> April with some EM members



### Expectations from the members

BUT need to

- **Simplify and streamline** the structure to avoid duplication of work/meetings
- Avoid redundancy and find the right **balance** between multi-metallic and metal-specific work
- Increase link between **EM and National Federations**
- Find solutions to make **workload** more sustainable and allow further capacity-building
- Discussion cannot be limited to EHS and REACH only as resources/members/funding-related

## Meeting 5<sup>th</sup> April with some EM members

### SUSTAINABILITY AT LARGE



Increasing trends on :

- Environment, Human Health
- Circular Economy
- CPW
- Chemicals Management
- Sectorial cooperation (e.g. MISA)

- **More and more focus at product level**
- **Integrating fields**

Sustainability: concepts & methodologies discussed both at EU and UN levels

Energy/Climate Change: implementation phase at National level  
(focus at process level)

Trade: Due diligence and conflict minerals also discussed at OECD level

(Social), (Safety) : not dealt with by EM

## Meeting 5<sup>th</sup> April with some EM members



### Observation from EM staff

- **“Integrating topics and issues”** require expertise and anticipation, across Committees at EM level (mainly EHS-REACH-SUS)
- **Decrease in ‘EHS’** (non REACH/CLP) content (2 files left)
- **Learnings** REACH/CLP applied in EHS
- **Resources** are a real challenge: workload but also to allow capacity-building
- REACH Forum drains more attention/members as adapted itself quicker to the trends and integrates multi-expertise (including users for example)  
=> **more tempting to join/remain in REACH Forum than EM if interest in chemicals management**
- Current EM membership rules do not allow REACH ‘units’ (consortia/downstream users) to join EM

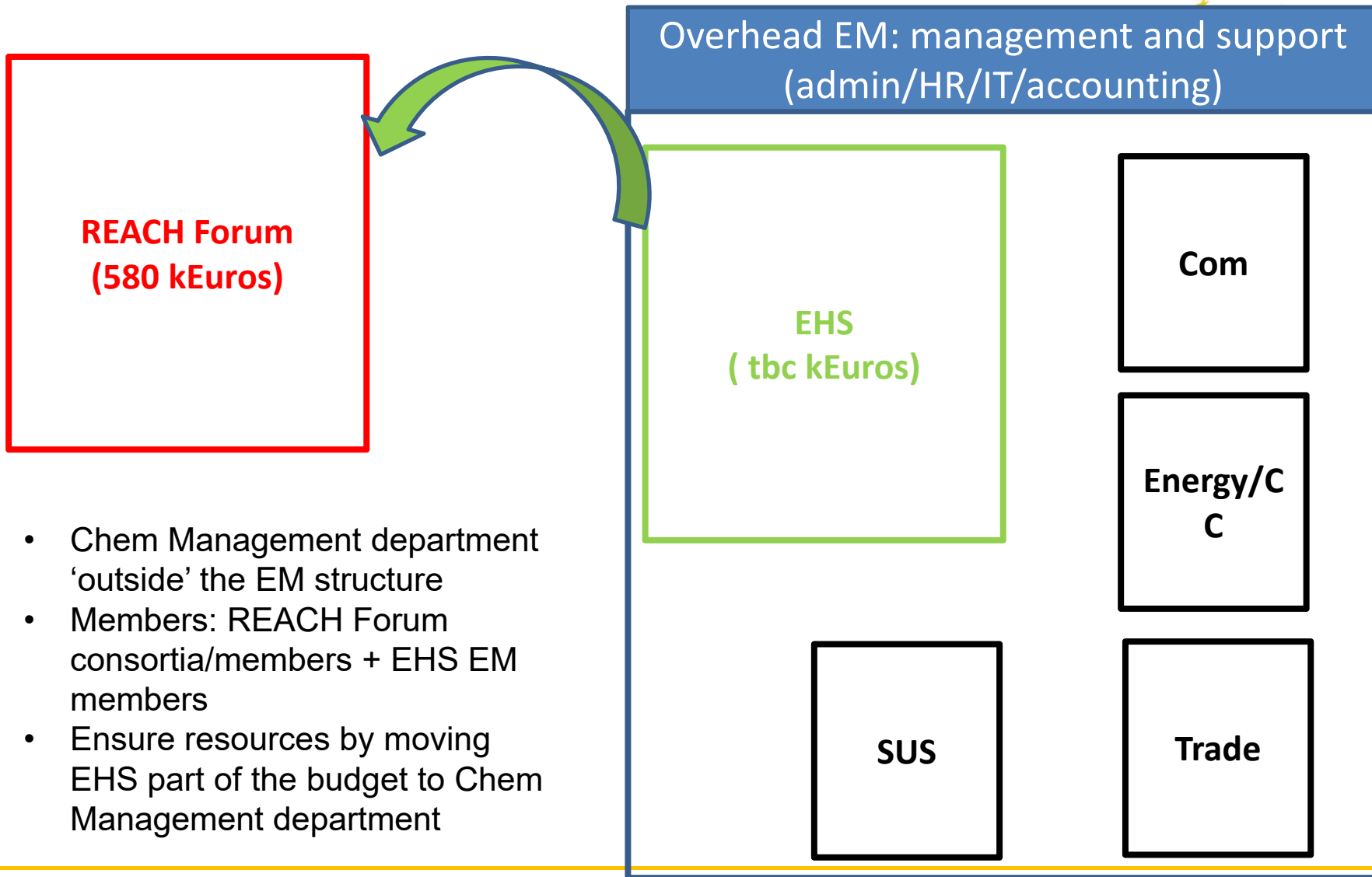
## Meeting 5<sup>th</sup> April with some EM members



### In practice

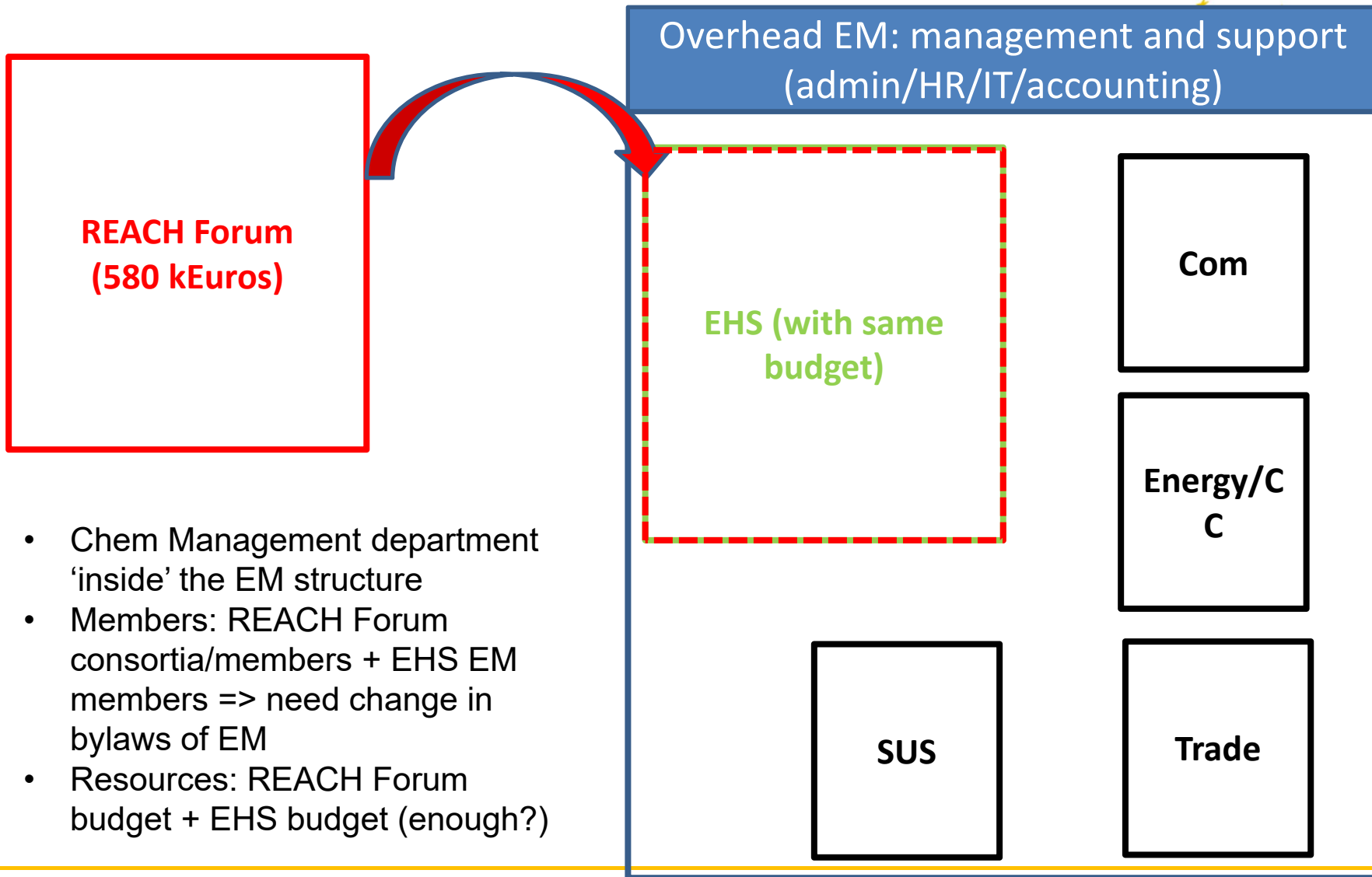
- Merging REACH/CLP and EHS in a 'Chemicals Management' department is justified considering the expectations and trends
- Question therefore becomes: how do we ensure this Chemicals Management department fulfil its roles and expectations?
  - Credibility and representation
  - Funding and resources
  - Membership
  - Stability
- 3 different options were explored

# Option 1: Merge EHS within REACH Forum



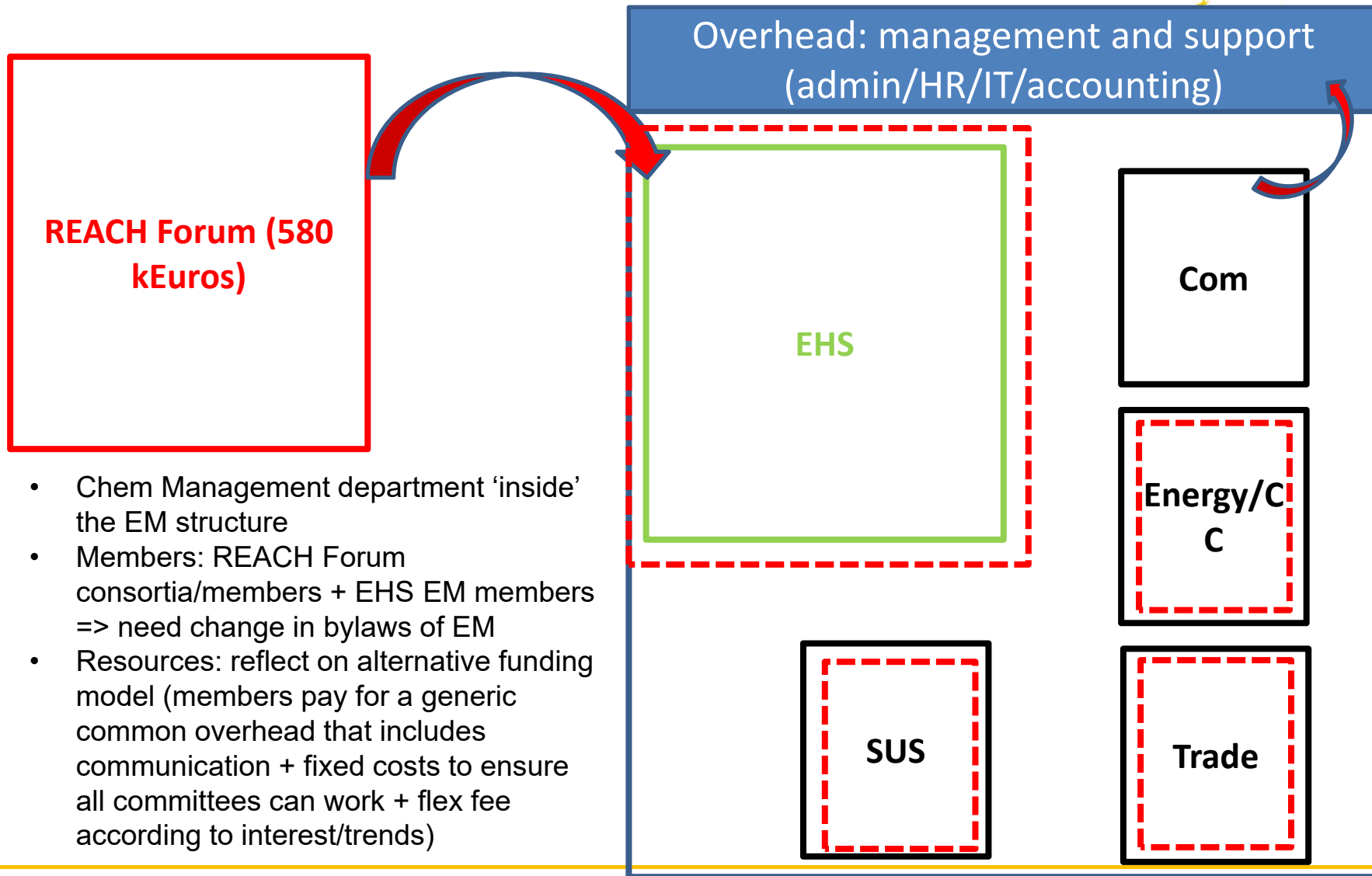
- Chem Management department 'outside' the EM structure
- Members: REACH Forum consortia/members + EHS EM members
- Ensure resources by moving EHS part of the budget to Chem Management department

# Option 2: bring REACH Forum under EM



- Chem Management department 'inside' the EM structure
- Members: REACH Forum consortia/members + EHS EM members => need change in bylaws of EM
- Resources: REACH Forum budget + EHS budget (enough?)

# Option 3: bring REACH Forum under EM and have a more à la carte structure



- Chem Management department 'inside' the EM structure
- Members: REACH Forum consortia/members + EHS EM members => need change in bylaws of EM
- Resources: reflect on alternative funding model (members pay for a generic common overhead that includes communication + fixed costs to ensure all committees can work + flex fee according to interest/trends)

## Conclusions



- Need to integrate REACH/CLP and EHS in Chemicals Management (in line with trends, allows streamlining)
- Need to ensure stability of EM
- Options 2 or 3 preferable as integration within EM but requires to be attractive (is flexibility a way forward?)
- Avoid silo working between committees to anticipate trends
- Ensure **fairness** in contributions

## Next steps



- Discuss best funding of the EM structure: this is NOT only a EHS & REACH issue
- Identify smart solution for different types of memberships
- Demonstrate added value of EM
- Carry out actions agreed at Management Committee:
  - Draw scenarios: gaps in case REACH Forum merges with EHS within EM without changes in membership rules and in case EM members redraw from EM as they get what they need via the Forum
  - Matrix showing overlap issues EHS vs. REACH and CLP
  - Time management sheets EHS/REACH staff



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## 6. A.O.B. and closure of the meeting

## A.O.B. and closure of the meeting



- a. Summary reports regarding Responsible Sourcing (activities in Germany)
- b. NSFR (status report after recent meetings of Fachvereinigung Edelmetalle with German MEPs)
- c. December 2018 GA and 2019 GA meetings



# THANK YOU

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