



European Precious Metals  
Federation

European Precious Metals Federation

# EPMF Board and PMC Management Committee meeting

5 November 2018 | Brussels, Belgium



# 1. Welcome and introduction

# Confidentiality and Competition law

DO	DON'T
¶	
<b>Application of competition law</b>	
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 Association's Articles of Association and Internal Rules complies with the provisions of the REACH Regulation. ◻
¶	
<b>Consultation in Matters of Competition Law</b>	
Consult an in-house legal expert or the compliance officer of your company/association or an external lawyer whenever there are uncertainties respecting compliance with competition law. ¶	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. ◻
Stop all meetings/discussions which are not in compliance with these Compliance Guidelines until a legal expert has been involved. ◻	
¶	
<b>Activities in any preliminary phase and at any other stage of operation of the Association</b>	
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 of the effect of preventing, restricting and/or distorting competition are prohibited within the scope of the Association's Articles of Association and Internal Rules, including: ¶
◻	- → Coming to agreement, including arrangements or collusions, about prices, markets and customers (see Art. 101 paragraph 1 a)-e) TFEU); ¶
	- → Joint boycotting of other companies; ¶
	- → The unjustified unequal treatment of trade partners; ¶
	- → The abusive exploitation of a dominating market position. ◻
¶	
<b>Exchange of Confidential Information</b>	
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: ¶
	- → Production capacities; ¶
	- → Productions or sales volumes; ¶
	- → Import volumes; ¶
	- → Market shares; ¶
	- → Price policy; ¶
	- → Distribution and marketing terms; ¶
	- → Marketing strategies; ¶
	- → Information regarding the relationship with suppliers. ◻
¶	
<b>Documentation on Cooperation</b>	
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 Members. ◻	
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:

- Francisco Boo, Metalor
- Cédric Léger, ASFCMP
- Wouter Ghyoot, Umicore
- Jörn Mühlenfeld, Aurubis
- Heinz-Günter Schenzel, C. Hafner
- Clémence Siret, SAFT
- Dorothea Annette Steiger, Heraeus

### PMC Management Committee:

- Francisco Boo, Metalor
- Guy Ethier, Umicore
- Jörn Mühlenfeld, Aurubis
- Heinz-Günter Schenzel, C. Hafner
- Dorothea Annette Steiger, Heraeus

### Apologies:

- Holger Zitt, BASF
- Philipp Reisert, FVE

### EPMF/PMC Secretariat:

- France Capon
- Audrey Rondepierre

**Quorum is reached**



# Approval of the 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 Combined EPMF and PMC meeting (6 September 2018)

## 2. Status of EPMF membership (For recommendation to the EPMF GA)

- Cri Criterion
- Agnico Eagle

## 3. Status of 2018 accounts (For information)

## 4. Status of PMC termination (For recommendation to the PMC GA)

## 5. EPMF Workplan, Budget and HR (For recommendation to the EPMF GA)

## 6. Increase of financial transparency and decrease of reserves to absolute minimum (For discussion)

## 7. 2018 EPMF Event (For discussion and approval)

## 8. Preparation of the meeting with the Board of the FVE (For discussion)

## 9. A.O.B.

- Next conference call: 28 February 2018
- Format 2019 December GA

**FOR APPROVAL**



## Approval of minutes of previous meeting (6 September 2018)

Actions	Who?	When?	Status
EPMF membership: Send a reminder via registered letter to the companies who did not reply yet	FC	September 2018	DONE
Discuss technical arguments with the Ag WG	KA	October 2018	DONE
Update the Advocacy strategy (mid-term) highlighting the need to extend the MS meetings to allies at a mid-term. Italy could be a good candidate to support EPMF key messages.	FC	ASAP	DONE
Send JRC documents on detection limits to the Secretariat	Aurubis	September 2018	DONE
Share with FVE EPMF/EM input into the CPW consultation	FC	September 2018	DONE
Check wording of “credit note” for the communication with the LoA buyers	FC	September 2018	DONE
Put in place a transparent system to manage the LoA reimbursement	FC/AR	Q4 2018	ONGOING
Communication with the LoA buyers	FC	October 2018	DONE
Calculation of the LoA costs based on 2018 real costs after audit and following the proposal on admin costs	AR	March 2019	
Reinvoicing or crediting of LoA buyers on the basis of the new 2019 LoA costs	AR	April 2019	



## Approval of minutes of previous meeting (6 September 2018)

Actions	Who?	When?	Status
Reshape reserves table booking separately “legally binding reserves” (legal obligations/contractual arrangements/LoA) and the reserves related to the next regulatory challenge (forecast)	AR	October 2018	<b>DONE</b>
Contact the bank to check the minimum amount required and make a final decision on investment	FC	October 2018	<b>DONE</b>
Present EPMF needs in Germany to FVE at the next FVE Board meeting on 6 <sup>th</sup> November 2018 (FC, EPMF President and Vice-President)	FC/President/Vice-President	6 November 2018	
Circulate to the Assembly the EPMF Risk Register and the EM equivalent (FC, September 2018)	FC	September 2018	<b>DONE</b>
Request to the EPMF Assembly who is interested to join the Pb and PbO platform (FC, September 2018)	FC	September 2018	<b>DONE</b>
Discuss at the SVHC WG the Pb and PbO WP (FC/JM, October 2018)	FC/JM	October 2018	<b>DONE</b>
Put a system in place to maintain the EPMF Risk Register up-to-date (FC, September 2018)	FC	September 2018	<b>DONE</b>
Request to the EPMF Assembly who is interested to receive EM communication on IED (FC, September 2018)	FC	September 2018	<b>DONE</b>
Add a crisis management/risk management to the social media strategy (FC/consultants, October 2018)	FC/consultants	October 2018	<b>DELAYED</b>
Send to the Secretariat Regulatory Affairs job description (Aurubis, ASAP)	Aurubis	ASAP	<b>DONE</b>





## 2. EPMF Membership

## New EPMF members

- CRI Criterion
- Agnico Eagle

For recommendation to the Assembly

- Still no reply from Ferro



## EPMF: 38 members

•Affinor	•Heimerle + Meule	•Saft
•Agnico-Eagle	•Heraeus	•Saxonia
•Ames Goldsmith U.K.	•Johnson Matthey	•Tanaka Kikinzoku Kogyo
•Aurubis	•KCM AD	•Traxys Europe
•BASF	•KGHM Polska Miedz	•Umicore
•Boliden	•Krastsvetmet	•Valcambi
•C. Hafner	•Lipmann Walton & Co.	•Varinor
•Chimet	•Lucas Milhaupt	
•Climax Molybdenum	•Metalor	<b>National Associations:</b>
• Cri Criterion	•Norilsk Nickel	ASFCMP
•Doduco	•PAMP	ASSOMET
•Du Pont UK	•PX Group	Fachvereinigung Edelmetalle
•Glencore	•Rustenburg (Anglo)	
•HCM	•Safimet	



## PMC members not moving to EPMF

- Cendres & Metaux: no LoA - as of 2019, non-compliant with Data sharing except if deactivating REACH registration
- Montanwerke Brixlegg => LoA
- Recylex => LoA





## 3. Status of 2018 accounts

## EPMF accounts – Q3 2018

		2018 Budget	Expenses by 30/09/2018	Difference Budget- Expenses
1.1	Salaries and salary-related costs	€ 43.400	€ 30.400	€ 13.000
1.2	Office costs	€ 8.700	€ 8.700	0,00
1.3	Meeting, travel and accomodation costs	€ 16.500	€ 16.247	€ 253
1.4	External costs:	€ 98.600	€ 95.359	3.241,00
	<i>Eurométaux membership fee</i>	€ 82.300	€ 82.894	-594,00
	<i>ICMM</i>	€ 2.700	€ 1.752	948,00
	<i>Liability Insurance</i>	€ 1.400	€ 1.155	245,00
	<i>Legal support</i>	€ 6.000	€ 6.000	0,00
	<i>Accountancy and audits</i>	€ 4.800	€ 3.558	1.242,00
	<i>Chem-Watch Asia Hub</i>	€ 1.400	€ 0	1400,00
1.5	Restructuration	€ 20.000	€ 27.831	-7.831
1.6	Risk Register	€ 30.000	€ 22.921	€ 7.079
	<b>TOTAL</b>	<b>€ 217.200</b>	<b>€ 201.458</b>	<b>€ 15.742</b>



## PMC accounts – Q3 2018

	2018 Approved Budget	2018 Cash-out (Approved Budget + Committed by 31/12/2017)	Expenses by 30/09/2018	2018 Committed Expenses	TOTAL Expenses by 30/09/2018 + 2018 Committed	Remaining available cash-out (2018 budget- Expenses-2018 Committed)
Administrative costs	€ 601.700	€ 665.860	€ 387.424	€ 114.320	€ 501.744	€ 164.116
Ag metal (including nano)	€ 937.603	€ 980.603	€ 78.190	€ 104.412	€ 182.602	€ 798.001
Ag compounds	€ 954.103	€ 983.103	€ 75.624	€ 109.630	€ 185.254	€ 797.849
Au metal	€ 48.258	€ 48.258	€ 4.484	€ 27.035	€ 31.519	€ 16.739
Au compounds	€ 37.008	€ 40.760	€ 3.441	€ 5.979	€ 9.420	€ 31.340
Ag cyanide/Potassium dicyanoargentate	€ 14.255	€ 18.427	€ 3.650	€ 6.063	€ 9.713	€ 8.714
Potassium dicyanoaurate	€ 106.010	€ 106.010	€ 2.167	€ 9.925	€ 12.092	€ 93.918
Pt metal	€ 10.264	€ 10.264	€ 2.290	€ 8.477	€ 10.767	€ -503
Chloroplatinates	€ 59.927	€ 59.927	€ 9.662	€ 16.023	€ 25.685	€ 34.242
Karstedt	€ 50.047	€ 50.047	€ 7.610	€ 12.719	€ 20.329	€ 29.718
Pt compounds (others)	€ 296.393	€ 662.487	€ 51.653	€ 266.536	€ 318.189	€ 344.298
Pd metal	€ 10.097	€ 10.097	€ 2.973	€ 8.873	€ 11.846	€ -1.749
Pd compounds	€ 700.001	€ 988.834	€ 128.584	€ 803.162	€ 931.746	€ 57.088
Rh metal	€ 8.020	€ 8.020	€ 725	€ 8.645	€ 9.370	€ -1.350
Rh III compounds	€ 203.740	€ 259.235	€ 46.116	€ 43.727	€ 89.843	€ 169.392
Rh compounds (others)	€ 26.140	€ 26.140	€ 2.582	€ 9.808	€ 10.429	€ 13.750
Ru metal	€ 9.627	€ 9.627	€ 621	€ 8.958	€ 25.742	€ 48
Ru compounds	€ 55.773	€ 105.885	€ 16.784	€ 5.504	€ 5.861	€ 83.597
Ir metal	€ 6.180	€ 6.180	€ 357	€ 8.423	€ 8.780	€ -2.600
Ir compounds	€ 27.620	€ 27.620	€ 357	€ 10.263	€ 10.620	€ 17.000
Re metal & compounds	€ 22.325	€ 24.325	€ 2.969	€ 2.895	€ 5.864	€ 18.461
Refinables	€ 55.531	€ 55.531	€ 27.240	€ 90.881	€ 118.121	€ -62.590
SVHC Roadmap	€ 28.600	€ 28.600	€ 19.541	€ 0	€ 19.541	€ 9.059
Silver EQS	€ 20.000	€ 65.239	€ 53.184	€ 11.133	€ 64.317	€ 922
<b>TOTAL</b>	<b>€ 4.289.224</b>	<b>€ 5.241.082</b>	<b>€ 928.228</b>	<b>€ 1.693.390</b>	<b>€ 2.619.393</b>	<b>€ 2.619.463</b>





## 4. Status of PMC termination

## Status of actions

PMC transfer of the rights and obligations to EPMF	
Number of PMC Notification letters sent out	63
Number of countersigned PMC Notification letters received	29
Additional letters to be sent out when reviewed by Lawyers	5

LoA review of the costs	
Number of emails sent to LoA buyers to inform them that they have paid a surplus	43
Number of emails sent to LoA buyers to inform them that we will invoice them in 2019	3
Additional emails to be sent out when reviewed by Lawyers	9





## 5. EPMF 2019 WP, BUDGET and HR

## 2019 EPMF WP Overall budget

For recommendation  
to the Assembly

	2019 DRAFT Budget	Risk indicator	2019 Amount to be invoiced excluding regulatory threats	2019 Amount to be invoiced including regulatory threats	FTE
<b>A. Administrative costs</b>	<b>688.400 €</b>		<b>688.400 €</b>	<b>688.400 €</b>	<b>1,9</b>
<b>B. REACH Platform costs</b>	<b>4.474.902 €</b>		<b>1.671.600 €</b>	<b>2.305.551 €</b>	<b>4,08</b>
Ag metal (including nano)	<u>336.525 €</u>	Red	0 €	246.990 €	0,70
Ag compounds	<u>377.525 €</u>	Red	0 €	1.447 €	0,70
Au metal	<u>272.981 €</u>	Yellow	0 €	0 €	0,05
Au compounds	<u>37.981 €</u>	Green	0 €	37.981 €	0,05
Ag cyanide/Potassium dicyanoargentate	<u>155.581 €</u>	Yellow	0 €	76.298 €	0,10
Potassium dicyanoaurate	<u>32.981 €</u>	Green	0 €	0 €	0,05
Pt metal	<u>271.033 €</u>	Yellow	0 €	0 €	0,04
Chloroplatinates	<u>271.311 €</u>	Yellow	0 €	0 €	0,20
Karstedt	<u>851.311 €</u>	Red	792.856 €	851.311 €	0,20
Pt compounds (others)	<u>433.611 €</u>	Red	433.611 €	433.611 €	0,30

Green: maintenance phase

Yellow: challenges with quick fix

Red: challenges with potential high impact on business



## 2019 EPMF WP Overall budget

For recommendation  
to the Assembly

	2019 DRAFT Budget	Risk indicator	2019 Amount to be invoiced excluding regulatory threats	2019 Amount to be invoiced including regulatory threats	FTE
Pd metal	<u>21.033</u> €	Green	0 €	0 €	0,04
Pd compounds	<u>323.072</u> €	Yellow	323.072 €	323.072 €	0,40
Rh metal	<u>20.501</u> €	Green	0 €	0 €	0,04
Rh III compounds	<u>145.111</u> €	Yellow	0 €	60.977 €	0,30
Rh compounds (others)	<u>205.811</u> €	Yellow	81.517 €	166.517 €	0,20
Ru metal	<u>20.501</u> €	Yellow	0 €	20.501 €	0,04
Ru compounds	<u>65.653</u> €	Yellow	0 €	0 €	0,08
Ir metal	<u>25.501</u> €	Green	0 €	10.343 €	0,04
Ir compounds	<u>76.501</u> €	Yellow	40.542 €	76.501 €	0,04
Re metal & compounds	<u>6.994</u> €	Green	0 €	0 €	0,01
Refinables	<u>523.382</u> €	Red	0 €	0 €	0,50

Green: maintenance phase

Yellow: challenges with quick fix

Red: challenges with potential high impact on business



## 2019 EPMF WP Overall budget

For recommendation  
to the Assembly

	2019 DRAFT Budget	Risk indicator	2019 Amount to be invoiced excluding regulatory threats	2019 Amount to be invoiced including regulatory threats	FTE
<b>C. Non-REACH Platform costs</b>	<b>364.300 €</b>		<b>299.000 €</b>	<b>299.000 €</b>	<b>1</b>
SVHC Roadmap	20.300 €	Green	0 €	0 €	0,10
Silver EQS	44.000 €	Red	44.000 €	44.000 €	0,20
Chemicals/waste/products Roadmap	10.000 €	Green	10.000 €	10.000 €	0,05
Occupational Health	10.000 €	Green	10.000 €	10.000 €	0,05
Responsible sourcing	10.000 €	Green	10.000 €	10.000 €	0,05
Communication & advocacy	45.000 €	Green	0 €	0 €	0,05
Lead & Lead compounds authorisation	225.000 €	Red	225.000 €	225.000 €	0,50
<b>GRAND TOTAL</b>	<b>5.527.602 €</b>		<b>2.659.000 €</b>	<b>3.292.951 €</b>	<b>6,98</b>

Green: maintenance phase

Yellow: challenges with quick fix

Red: challenges with potential high impact on business



## 2019 EPMF Workplan: focus on platforms

Silver metal Platform	
<b>Manager:</b> Katrien Arijs	<b>2019 Budget:</b> 336 525 €
<b>Mandate:</b>  <b>The silver metal platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the silver dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification.</li> </ul>	<b>HR:</b> 0,7 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Further testing to improve the read-across approach</li> <li>• Developing the HH and Envi RAAF (Read Across Assessment Framework)</li> <li>• EOGRTs testing and interpretation if TP is accepted (including enabling testing)</li> <li>• Update of the CSR</li> <li>• Advocacy on CLH in biocides for silver active substances</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• The main challenge for silver and silver compounds will be the EOGRTs program and the potential consequences on the reprotox classification of silver. Another related challenge is the consistency between the biocides and REACH approaches regarding the reprotox classification. A strategy has been developed and is updated on a regular basis to address it taking into account the consequences on the silver market should this be considered as a reprotox cat 2 or 1B.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Silver compounds Platform	
<b>Manager:</b> Katrien Arijns	<b>2019 Budget:</b> 377 525 €
<b>Mandate:</b>  The silver compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the silver compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,7 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Further testing to improve the read-across approach</li> <li>• Developing the HH and Envi RAAF (Read Across Assessment Framework)</li> <li>• EOGRTs testing and interpretation if TP is accepted (including enabling testing)</li> <li>• Update of the CSR</li> <li>• Advocacy on CLH in biocides for silver active substances</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• The main challenge for silver and silver compounds will be the EOGRTs program and the potential consequences on the reprotox classification of silver. Another related challenge is the consistency between the biocides and REACH approaches regarding the reprotox classification. A strategy has been developed and is updated on a regular basis to address it taking into account the consequences on the silver market should this be considered as a reprotox cat 2 or 1B.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Gold Metal Platform	
<b>Manager:</b> Vincent Dunon	<b>2019 Budget:</b> 272.981€
<b>Mandate:</b>  The <b>gold metal platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the gold dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,05 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Update of the dossier (remove waiving statements for mammalian toxicity) including RDT/Reprotox screening assay</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• The increasing attention on nanos could trigger some challenges for the gold dossier in case of nanogold would be identified in the membership production.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Gold compounds Platform	
<b>Manager:</b> Vincent Dunon	<b>2019 Budget:</b> 37 981 €
<b>Mandate:</b>  The <b>gold compounds platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the gold compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,05 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Update of uses and ES</li> <li>• Testing of self-ignition for the Balsams dossier to replace weak waiver</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• No immediate challenge identified so far.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Silver cyanide/Potassium dicyanoargentate Platform	
<b>Manager:</b> Vincent Dunon	<b>2019 Budget:</b> 155 581 €
<b>Mandate:</b>  <b>The silver cyanides platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the silver cyanides dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,1 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Testing on mutagenicity (if TP approved by ECHA)</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Potassium dicyanoaurate Platform	
<b>Manager:</b> Vincent Dunon	<b>2019 Budget:</b> 32 981 €
<b>Mandate:</b>  <b>The gold cyanide platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the potassium dicyanoaurate dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,05 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Testing on mutagenicity (if TP approved by ECHA)</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Platinum Metal Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 271 033 €
<b>Mandate:</b>  <b>The platinum metal platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the platinum dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,04 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Update of the dossier (replace waiving statements for mammalian toxicity) including RDT/Reprotox screening assay</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• No immediate challenge identified so far.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Chloroplatinates Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 271 311 €
<b>Mandate:</b>  The <b>Chloroplatinates platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the chloroplatinates dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,2 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Dossier updates based on peer review by external experts</li> <li>• Genotoxicity testing program</li> <li>• Review of the shadow RMOas and potential advocacy activities in case of selection of CIPTs by ACROSS</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Due to harmonized classification, the CIPTs could be screened in 2019 to be considered for further regulatory actions.</li> <li>• To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Karstedt Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 851 311 €
<b>Mandate:</b>  <b>The Karstedt platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the Karstedt dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,2 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Review phys-chem section</li> <li>• EOGRTS (if TP approved by ECHA)</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• To conduct the testing program on reprotox. The next challenge could be a consequence on the classification and related regulatory challenges.</li> </ul>	



# 2019 EPMF Workplan: focus on platforms

Platinum compounds (others) Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 433 611 €
<b>Mandate:</b>  The <b>platinum compounds platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the platinum compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,3 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade tetraammineplatinum dichloride from Annex III exempted dossier to Annex VII dossier.</li> <li>• Update of the read-across justification documents for ENV and HH</li> <li>• Genotoxicity testing program</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.</li> <li>• Upgrade remaining Annex III exempted dossiers to Annex VII dossiers.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Palladium Metal Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 21 033 €
<b>Mandate:</b>  <b>The palladium metal platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the palladium dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,04 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Update of the dossier (replace waiving statements for mammalian toxicity using read-across approach)</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• No immediate challenge identified so far.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Palladium compounds Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 323 072 €
<b>Mandate:</b>  The palladium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the palladium dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,4 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade palladium(II) acetate, tetraamminepalladium(II) nitrate, tetraamminepalladium(II) dihydroxide and palladium sulphate from Annex III exempted dossiers to Annex VII dossiers.</li> <li>• T/D testing to justify the read-across</li> <li>• Update of the read-across justification documents for ENV and HH</li> <li>• Dossier updates based on peer review by external experts</li> <li>• Revision PNEC report</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Upgrade remaining Annex III exempted dossiers to Annex VII dossiers.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Rhodium Metal Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 20 501 €
<b>Mandate:</b>  The rhodium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the rhodium dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,04 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Update of the dossier (replace waiving statements for mammalian toxicity using read-across)</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• No immediate challenge identified so far.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Rhodium III compounds Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 145 111 €
<b>Mandate:</b>  The rhodium III compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the rhodium III compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,3 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade rhodium trichloride and dirhodium trisulphate from Annex III exempted dossiers to Annex VII dossiers.</li> <li>• T/D testing to justify the read-across</li> <li>• Create the read-across justification documents for ENV and HH</li> <li>• In vivo mutagenicity testing (if TP approved by ECHA)</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• To conduct the testing program on mutagenicity. The next challenge could be a consequence on the classification and related regulatory challenges.</li> <li>• Upgrade remaining Annex III exempted dossiers to Annex VII dossiers.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Rhodium compounds (others) Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 205 811 €
<b>Mandate:</b>  The rhodium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the rhodium compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,2 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade dicarbonyl(pentane-2,4-dionato-O,O')rhodium, carbonyl(pentane-2,4-dionato(O,O')(triphenylphosphine)rhodium, tris(triphenylphosphine)rhodium(I) chloride from Annex III exempted dossiers to Annex VII dossiers.</li> <li>• T/D testing to justify the read-across</li> <li>• Create the read-across justification documents for ENV and HH</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Upgrade remaining Annex III exempted dossiers to Annex VII dossiers.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Ruthenium Metal Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 20 501 €
<b>Mandate:</b>  The ruthenium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the ruthenium dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,04 FTE
<b>Main tasks in 2019</b>	
<ul style="list-style-type: none"> <li>• Literature review</li> </ul>	
<b>Potential challenges in 2019 and beyond</b>	
<ul style="list-style-type: none"> <li>• Update of the dossier (replace waiving statements for mammalian toxicity) including RDT/Reprotox screening assay</li> </ul>	



# 2019 EPMF Workplan: focus on platforms

Ru compounds Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 65 653 €
<b>Mandate:</b>  The ruthenium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the ruthenium compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,08 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade ruthenium acetate and tris(nitrato-O)nitrosylruthenium from Annex III exempted dossiers to Annex VII dossiers.</li> <li>• T/D testing to justify the read-across</li> <li>• Create the read-across justification document for ENV</li> <li>• Update of the dossiers</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Upgrade remaining Annex III exempted dossier to Annex VII dossier..</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Iridium Metal Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 25 501 €
<b>Mandate:</b>  The iridium metal platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the iridium dossier</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,04 FTE
<b>Main tasks in 2019</b>	
<ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade of the dossier from Annex III exempted dossier to Annex VII dossier.</li> </ul>	
<b>Potential challenges in 2019 and beyond</b>	
<ul style="list-style-type: none"> <li>• No immediate challenges identified so far.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Iridium compounds Platform	
<b>Managers:</b> Jelle Mertens/Maxime Eliat	<b>2019 Budget:</b> 76 501 €
<b>Mandate:</b>  The iridium compounds platform is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the iridium compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,04 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Upgrade of diammonium hexachloroiridate from Annex III exempted dossier to Annex VII dossier.</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Upgrade remaining Annex III exempted dossier to Annex VII dossier.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Rhenium metal and compounds Platform	
<b>Managers:</b> Katrien Arijs	<b>2019 Budget:</b> 6 994 €
<b>Mandate:</b>  <b>The rhenium platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the rhenium and rhenium compounds dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,01 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Literature review</li> <li>• Update of the dossier (replace waiving statements for mammalian toxicity)</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Upgrade remaining Annex III exempted dossiers to Annex VII dossiers.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Refinables Platform	
<b>Managers:</b> Vincent Dunon	<b>2019 Budget:</b> 523 382 €
<b>Mandate:</b>  The <b>refinables platform</b> is related to the following obligations related to the REACH Implementation: <ul style="list-style-type: none"> <li>• Maintenance of the refinables dossiers</li> <li>• Dossier and/or Substance Evaluation (if relevant)</li> <li>• Restriction (if relevant)</li> <li>• Authorisation (if relevant)</li> <li>• Harmonized classification</li> </ul>	<b>HR:</b> 0,5 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Testing of phys-chem data gaps for split dossiers</li> <li>• Update waiver statements for flammability</li> <li>• T/D testing for updating the classification</li> <li>• Updating of the CSR including combined toxicity</li> <li>• Update of the dossiers based on the outcome of the MISA discussion on UVCB</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• The challenges are numerous:               <ul style="list-style-type: none"> <li>○ the methodology used for the RA of the refinables could be challenged by ECHA requiring additional (validation) testing</li> <li>○ the SID remains an uncertain area</li> <li>○ the “substance in substance” approach promoted by Member States to tackle SVHC in substances</li> <li>○ the lack of consistency between Circular Economy and Chemicals policy.</li> </ul> </li> </ul>	



# 2019 EPMF Workplan: focus on platforms

SVHC Roadmap Platform	
<b>Managers:</b> Jelle Mertens/France Capon	<b>2019 Budget:</b> 20 300 €
<b>Mandate:</b> <ul style="list-style-type: none"> <li>Identify substances of relevance to EPMF impacted by regulatory measures like REACH or the Harmonized Classification &amp; Labelling.</li> <li>Identify policy issues of relevance to EPMF in the context of the Roadmap implementation (e.g. RMOA, recycling, REACH review etc.)</li> <li>Conduct advocacy on relevant substances or policy issues in order to prevent or mitigate the potential impacts that the implementation of the Roadmap may have on the Precious Metals Industry.</li> </ul> <p>Substances falling in the remit of this Platforms are:</p> <ul style="list-style-type: none"> <li>Substances which are (intentionally) used in Precious Metals production/recycling (e.g. as reagents or additives)</li> <li>Substances which occur as by-products, or impurities or waste generated in Precious Metals production/recycling</li> <li>Substances related to ancillary uses (e.g. RCF's)</li> </ul>	<b>HR:</b> 0,1 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>SVHC monitoring</li> <li>Advocacy on Minor constituents Risk Management</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>The “substance in substance” approach promoted by Member States to tackle SVHC in substances which could impact a lot of substances used or produced by EPMF members.</li> <li>The prioritisation of key substances for the production of precious metals like hydrazine, Pb, Borates etc.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Water Framework Directive and silver Platform	
<b>Managers:</b> Katrien Arijns	<b>2019 Budget:</b> 44 000 €
<b>Mandate:</b> <ul style="list-style-type: none"> <li>• Build the scientific basis for the non-prioritisation of silver under WFD</li> <li>• Provide the necessary scientific input in case of prioritisation of silver under WFD</li> <li>• Conduct advocacy at the different levels of the process to mitigate the impacts of a potential inclusion of Ag under the WFD.</li> </ul>	<b>HR:</b> 0,2 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Advocacy on silver freshwater EQS</li> <li>• Sediment testing to strengthen sediment PNEC</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• The lack of acceptance of the SSD approach for the freshwater EQS and of the EPMF updated freshwater EQS value.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Chemicals/Waste/Product Roadmap Platform	
<b>Managers:</b> France Capon	<b>2019 Budget:</b> 10.000€
<b>Mandate:</b> <ul style="list-style-type: none"> <li>• Ensure adequate input in preparation of the policy options to address the interface between chemicals, products and waste legislation</li> <li>• Review and influence these options when available</li> <li>• Conduct advocacy activities to mitigate the impacts of these options on the chemicals management of precious metals and on circular economy.</li> <li>• Promote consistency between Chemicals Management and Circular Economy</li> </ul>	<b>HR:</b> 0,05 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Monitor and influence the future actions recommended by the Commission as an outcome of the chemicals/waste/product Roadmap survey.</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Inconsistencies between Circular Economy and Chemicals management targets.</li> </ul>	



## 2019 EPMF Workplan: focus on platforms

Occupational Health Platform	
<b>Managers:</b> France Capon	<b>2019 Budget:</b> 10.000€
<b>Mandate:</b> <ul style="list-style-type: none"> <li>• Monitor CAD and CMD related activities related to precious metals substances but also critical substances used in precious metals production. (e.g.: inclusion of reprotox within CMD)</li> <li>• Monitor interactions between REACH and OSH (e.g.: SCOEL/RAC)</li> <li>• Conduct advocacy activities related to OSH.</li> </ul>	<b>HR:</b> 0,05
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Develop and advocate a position regarding the inclusion of reprotox into CMD</li> <li>• Active contribution to CII initiative on REACH and OSH</li> <li>• Develop and advocate a position on the Memorandum of Understanding from the EC on REACH and OSH</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>• Prioritisation of substances used (Pb) or produced (CIPTs) by the Commission to derive or update an OEL. This could be also an opportunity if the relevant data are available and the correct methodology is used by RAC.</li> </ul>	



# 2019 EPMF Workplan: focus on platforms

Responsible Sourcing Platform	
<b>Managers:</b> France Capon	<b>2019 Budget:</b> 10.000€
<b>Mandate:</b> <ul style="list-style-type: none"> <li>To ensure a smooth implementation of the EU conflict minerals regulation as an adequate input into the different revisions of the regulation.</li> <li>To follow the activities related to responsible sourcing at OECD level which could impact the EU regulation</li> <li>To conduct the relevant advocacy activities to ensure a strong and credible responsible sourcing policy within the precious metals industry.</li> </ul>	<b>HR:</b> 0,05 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>Monitor OECD activities on Responsible sourcing</li> <li>Monitor issue of the different guidance to implement the EU legislation on conflict minerals</li> <li>Continuous advocacy to remove the threshold on Au from the EU legislation</li> <li>Prepare a position regarding the inclusion of other Precious Metals in the EU legislation</li> </ul>	
<b>Potential challenges in 2019 and beyond</b> <ul style="list-style-type: none"> <li>The listing of other precious metals into the EU regulation</li> <li>The continuous use of a threshold to define the legal obligations of the stakeholders</li> <li>The lack of consideration for imposing mandatory application of the EU regulation throughout the supply chain.</li> </ul>	



# 2019 EPMF Workplan: focus on platforms

Communication and advocacy Platform	
<b>Managers:</b> France Capon	<b>2019 Budget:</b> 45 000€
<b>Mandate:</b> <ul style="list-style-type: none"><li>• To increase the visibility of the precious metals industry on the EU scene</li><li>• To develop and maintain a strong advocacy network with authorities, other industry associations, social partners and NGOs</li><li>• To organize communication and advocacy events (e.g.: authorities briefings etc.)</li><li>• To develop the relevant communication tools</li></ul>	<b>HR:</b> 0,05 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"><li>• Organize an event with authorities to advocate EPMF position on critical topics</li><li>• Contribute to Eurometaux Member States outreach tour on metals specific issues</li></ul>	



## 2019 EPMF Workplan: focus on platforms

Lead & Lead compounds authorisation Platform	
<b>Managers:</b> France Capon	<b>2019 Budget:</b> 225 000 €
<b>Mandate:</b> <ul style="list-style-type: none"> <li>• Data gathering to prepare the consultation on Pb</li> <li>• Update of the Intermediates review</li> <li>• Prevention and Advocacy: following ILA lines and developing specific arguments for EPMF in relation with Circular Economy</li> <li>• Prepare for AfA (Application for Authorisation) when needed</li> </ul>	<b>HR:</b> 0,50 FTE
<b>Main tasks in 2019</b> <ul style="list-style-type: none"> <li>• Gather socio-economic data in preparation of the public consultation on Pb</li> <li>• Gather information on substitution of Pb and PbO in precious metals production</li> <li>• Assess the impact of the (Substance in Substance) SiS discussion on the guidance on the interpretation of intermediate use of Pb and PbO</li> <li>• Develop advocacy strategy and campaign</li> <li>• AfA preparation: reflect on what could require an Authorisation and the organisation options to prepare an AfA</li> </ul>	





## **6. Increase financial transparency and decrease of reserves to absolute minimum**

**Upon Heraeus request**

# Introduction

- Heraeus concerns (to be raised by Dorothea Steiger)
- Questions received from Heraeus:
  - **About Karstedt:**
    - How many cost estimates for the Karstedt testing were asked for? Why weren't those cost estimates not shown to the respective registrants? What was the cheapest? Will the cheapest institute be taken?
    - When did ECHA tell the consortium that they will go for the testing proposal for Karstedt? Why wasn't this letter shown to the respective registrants so far?
    - Why does Heraeus have to pay that much for the testing?
    - What would happen if Heraeus would refuse to pay the money for the testing?
    - Would it be possible to do the testing under the auspices of Heraeus?
    - What would happen if Heraeus would refuse to participate at the testing?
    - What would happen if Heraeus reduces its tonnage band amount to an amount under 10 tons for Karstedt?
  - **About EPMF governance:**
    - To which law or which decision does EPMF refer when stating that EPMF has to have money at its bank account prior before concluding a contract?
    - EPMF/PMC said, there is a Belgian law ruling EPMF/PMC does have to a certain amount of money at its bank account every time. How much is this? How is this amount to be calculated



## Reminder of Board of Directors obligations

### Principle:

An international non-profit association under Belgian law (“**INPA**”) has a legal personality. Consequently, the directors commit only the INPA in the exercise of their function and are not personally liable for the obligations contracted on behalf of the INPA (Article 49 of the Act of 27 June 1921 on non-profit associations, foundations, European political parties and European political foundations). **However**, this provision does not provide for an exemption from liability for directors, who may, in the event of misconduct, be liable on their personal assets.



## Reminder of Board of Directors obligations

**Directors' liability:** Director must fulfil their mandate in *bonus pater familias* (“*en bon père de famille*”).

- **vis-à-vis the INPA:** If this is not the case, the INPA can claim compensation in court. The judge will check whether a diligent and prudent director would have acted in the same way. In fact, a director must at all time act in a justified manner. Thus, directors can be recognized as responsible if they contract obligations knowing that the INPA cannot respect them, or if they make expenses beyond the budget approved by the general assembly. In addition, the director is bound by a mandate to the INPA: he/she represents the INPA and acts on its behalf. If he/she carries out the mandate inadequately, he/she commits mismanagement, and his/her liability can be triggered towards the INPA, even for a slight fault. Negligence, such as lack of funds, may be considered as a mismanagement.
- **vis-à-vis third parties:** Third parties suffering damage as a result of misconduct and able to prove the existence of a causal link may seek compensation from both the INPA and its directors. A director commits a fault when he/she fails to comply with his/her general duty of care, by not acting as a normally prudent director in the same circumstances would have done. In these circumstances, anyone who has a contractual relationship with the INPA (staff, suppliers, customers, etc.) can claim compensation.



# Reminder of Board of Directors obligations

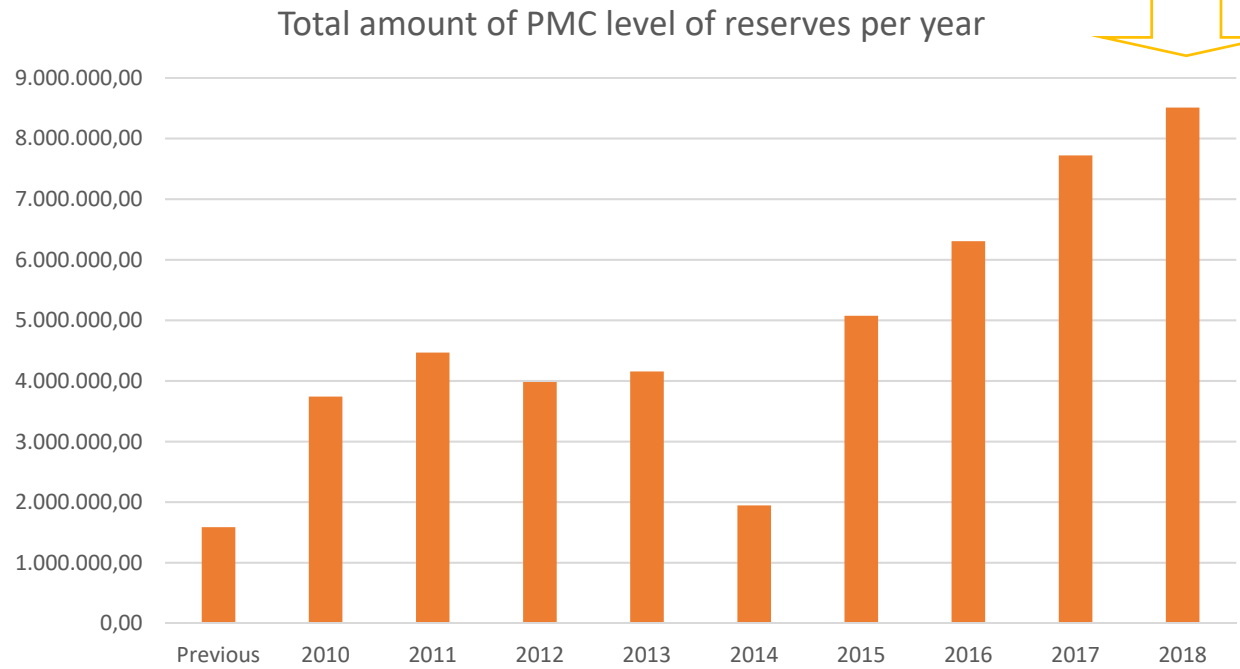
## Conclusion

Given the important time required to obtain the payment of the members' contributions (caused in many cases by their obligation to comply with their internal approval processes), if the contributions of the members were only to be requested/provided after the provision of services and the receipt of the suppliers' invoices, there will be a significant risk that the EPMF will be unable to pay these invoices on a timely basis. Due to these delays, the suppliers could claim default interests and penalties and start court proceedings in order to recover the unpaid amounts.



# History of level of the reserves: 2007-2018

Including 1 300 000 €  
to be reimbursed to  
LoA buyers



## Minimum reserves needed: agreed principles (September 2018)

- The EPMF Board recommends the following methodology for the calculation of the minimum reserves as from 2019:
  - Based on the **legally binding reserves** (ongoing contracts including employees and LoA dues)
  - Based on the **regulatory threats** and related activities needed (e.g.: additional testing, advocacy needs etc.)
  - Based on a **fixed amount of 25.000€** for the substances where no regulatory threats have been identified to be able to address unforeseen regulatory pressure in a short term. This amount has been chosen based on the experience with the manual completeness.



## Minimum reserves needed: two options

- Option 1: restrict reserves to legally binding obligations
- Option 2: extend reserves to immediate and realistic regulatory threats
- See Preparatory documents 3a and 3b

For recommendation to the Assembly





## 7. EPMF Event

# Status

- Final program available including all the speakers:
  - Tim Becker, Chief EU Compliance Officer, REACHLaw Ltd
  - Jean-Marc Brignon, Head of Unit (Economics and Decision), INERIS
  - Geert Dancet, Secretary General, Helsinki Chemical Forum
  - Guy Ethier, Senior Vice-President, Umicore
  - Enrique Garcia-John, Policy Officer, REACH Unit, DG Grow
  - Egbert Lox, Senior VP Government Affairs, Umicore
  - Jody Quirk, Legal and Policy Officer, DG Environment
  - Matti Vainio, Head of Unit Risk Management, ECHA (confirmed)
  - Julia Verhoeven, Centre for Safety of Substances and Products, Bureau REACH, RIVM
  - Hugo Waeterschoot, REACH Manager, Eurometaux
- Moderator: Nadine Dereza
- Teaser available: <https://youtu.be/MgW69IOwc1I>
- Videos production in process
- Announcement of the event on:
  - Chemical Watch: <https://chemicalwatch.com/71152/conflict-and-opportunity-chemical-management-the-circular-economy-precious-metals>
  - Euractiv: <https://www.euractiv.com/> - <https://www.euractiv.com/sections/politics/>  
<https://www.euractiv.com/sections/energy-environment/>





## 8. Preparation of the FVE Board meeting

# Introduction

- EPMF needs access to decisions makers in key MSs reinforcing national network
- Aim of the discussion: to have an overview of the EPMF network with National Federations and identify potential gaps



# Introduction - Mapping of (Precious) Metals National Federation



Member State	National Federation	Relationship with EPMF	Comment
Belgium	Agoria	Via EM network	No Precious Metals Federation in Belgium. Agoria covers PM and all EPMF topics of interest.
France	A3M	Via EM network	No Precious Metals Federation in France. A3M covers PM and all EPMF topics of interest.
Germany	FVE	EPMF Members	Precious Metals Federation in Germany. Focus on high political level activities in EHS, trade, sustainability and tax
	WVM	Via EM network	WVM covers all EPMF topics of interest but does not work on precious metals which is covered by FVE.
Italy	Assomet	EPMF Members	No Precious Metals federation in Italy. Assomet covers PM and all EPMF topics of interest.
Netherlands	VNMI	Via EM network	No Precious Metals federation in NL. VNMI covers PM and all EPMF topics of interest.
Poland	IGMNIR	Via EM network	No Precious Metals federation in Poland. IGMNIR covers PM and all EPMF topics of interest.
UK	None		Member companies are used for advocacy purposes.



## EPMF needs in Germany



- German MEPs in Brussels
- German Parliamentarians
- Ministries and agencies involved in Chemicals Management, EHS and Circular Economy (BAUA, UBA etc.)



European Precious Metals  
Federation



European Precious Metals  
Federation

# EPMF needs in Germany: overlaps between EPMF, FVE and WVM

*Chemicals management/EHS: key topics for advocacy needs*

Political Areas	Topics	EPMF	FVE	WVM
<b>Responsible sourcing</b>		<b>X</b>	<b>X</b>	<b>X</b>
	EU legislation	Advocacy	Advocacy	Advocacy
	National implementation		Advocacy	Advocacy
	OECD activities	Advocacy		Advocacy
	Industry initiatives			Advocacy and implementation
<b>Sustainability</b>		<b>X</b>		<b>X</b>
	Chemicals/Waste/Products	Advocacy		Advocacy
	Circular Economy	Advocacy		Advocacy
<b>Tax policy</b>		<b>X</b>	<b>X</b>	<b>X</b>
	Metals weight account	Advocacy	Advocacy	Advocacy
	Lifo		Advocacy	Advocacy
	VAT	Advocacy	Advocacy	Advocacy
<b>Chemicals Management/EHS</b>		<b>X</b>	<b>X</b>	<b>X</b>
	WFD	Advocacy and Science	Monitoring	Advocacy
	OHS	Advocacy and Science		Advocacy
	REACH	Advocacy, Science, Implementation	Monitoring	Advocacy
	CLP	Advocacy, Science, Implementation		Advocacy
	IED	Advocacy, monitoring		Advocacy, monitoring
<b>Trade</b>			<b>X</b>	<b>X</b>
	Digital Market (online business)		Advocacy	
	NSFR	Advocacy	Advocacy	



# EPMF needs in Germany: examples

## *Highest immediate priorities*

---

Ag Environmental Quality Standard (EQS)

---

Ag harmonized classification (CLH)

---

REACH Authorisation (Substance in substance issue and Pb/PbO)



## EPMF needs in Germany

*How to get technical and political advocacy organized?*



- How EPMF can get access in Germany to Ministries and agencies involved in Chemicals Management, EHS and Circular Economy (BAUA, UBA etc.)?
- How to join forces with other metals in Germany on multi-metallic issues?





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

## A.O.B.

- Next conference call: 28 February 2019
- Format 2019 December GA





# THANK YOU

[www.epmf.be](http://www.epmf.be) | [info@epmf.be](mailto:info@epmf.be)

Avenue de Broqueville 12, B-1150 Brussels  
+32 (0)2 761 01 00