



Pb&PbO Platform

Meeting, 1 April 2019 (15:00-17:00)

Actions	Who?	When?	Status
Check with ILA about Pb data gathering/monitoring campaign /+ adaptation of NI tool	MVDS	May 2019	
Draft EPMF actions plan on OELs	MVDS	May 2019	
Review fact sheet on Material for reclaim on Authorisation scope	Members	19 April 2019	
Contact process experts to review the other refinables	MVDS	April-May 2019	
Send the intermediate guidance on Pb/PbO	FC	ASAP	
Draft explanatory statements to contextualize the fact sheets	MVDS	May 2019	
Mass balance sheet: contact companies individually to have clarifications	MVDS	April 2019	
Update mass balance sheet	MVDS	End of April 2019	
Comment on AoA draft	Members	6 th May 2019	
Engage with Socrates to review EPMF technical statements	FC	May 2019	

These minutes summarize the main discussion points and agreements of the meeting, and should be considered together with the slides and preparatory documents (circulated to the group ahead of the meeting)

Post-meeting information

Change of timing in the prioritisation discussion:

The prioritisation process where a proposal is made every 12 months (June) followed by a Public Consultation in September will be changed into an 18 months process.



The 10th draft recommendation for prioritisation (possibly including Pb metal) will not be discussed by the Member States Committee before its meeting of December 9-13, 2019, with a decision on the proposal in February 2020, the Public Consultation being launched immediately after.

Welcome and Introduction

Participants were welcomed to the meeting and reminded of the Confidentiality and Competition Law applicable. The agenda was approved.

No remarks were made on the minutes of the previous meeting held on 12 February 2019 and the minutes were approved.

Exposure data: availability and monitoring campaign

Exposure data:

ILA prepares for when a Pb OEL value will be available (end 2019 / beginning 2020) and will be followed by a public consultation.

Together with EBRC, ILA is preparing a strategy to present the current industrial exposure across the value chains where lead is being used. ILA's approach will need to take into account the lack of data in some downstream use sectors. In function of the data that will be identified as critical for a credible overview across industry, there might be a need for a monitoring campaign across (large) sections of the industry.

EPMF has signaled the PM industry's preparedness to cooperate in this field with ILA and EPMF will be informed in April about the actions that will be proposed to industry.

Impact assessment of OEL:

EPMF raised ILA's attention to the existence of the Nickel Institute's impact assessment tool, developed with EBRC, as it might contribute to a concerted, consistent and cost-efficient estimation and presentation of likely impacts across industry.

ILA welcomed the suggestion and would discuss this internally to check the potential usefulness of an adopted tool and the benefits of a cost-sharing model for using the impact assessment tool.

ACTIONS:

- **EPMF to remain in contact with ILA about the monitoring campaign and potential use of data for/from the PM industry, as well as on the potential interest in the Ni impact assessment tool. The Pb/PbO Platform will be informed as soon as ILA's approach will be known.**
- **In function of ILA feedback, EPMF to draft an action plan in May 2019.**

Scope of authorization: presentation of the factsheet

In view of the uncertainty about the future scope of authorizations created by the CARACAL paper (status of impurities with a Substance-in-Substance or Substance-in-Mixture approach that would also cover UVCBs, and ambiguous statements on mixing in recovery processes), the EPMF secretariat will draft a factsheet per refinable. These factsheets are for internal use and are not intended to replace the ID documents produced in view of the Registrations of the PM refinables. The aim remains the safeguarding of the intermediate status of the refinables by explaining – with the focus on lead – that the UVCBs in question are transformed into other UVCBs for further process steps. The precision of the description of what happens to these UVCBs (and to lead therein) will be critical in case industry needs to defend its interpretation on the status of the materials.



One model for factsheet was produced for a refinable and companies are invited to review it.

ACTIONS:

- **Companies to review factsheet model (tested out for “Materials for Reclaim”) by 19 April 2019**
- **EPMF will look for process expert advice so as to make sure the interpretations in the fact sheets are correct and can be explained in a credible manner (April – May 2019)**
- **EPMF to foresee some explanatory statements to help reading the fact sheets (principles regarding the notions of use, including mixing etc.)**

Mass balance sheet: outcome of the data gathering

A corrected data collection sheet will allow to get clarifications (via bilateral discussions) of data with companies who already provided figures.

Some company data are still missing and will be requested to provide a more complete picture of the significance of Pb in PM refining/recycling. In this context, the question was raised if it was possible for companies to provide an indication of how much Pb is in circulation in their processes at any moment in time, taking into consideration the quantities that are recirculated.

ACTIONS:

- **Michel VDS to contact companies bilaterally for clarifications (<19 April 2019)**
- **Companies not having provided data will be contacted again and be provided with the corrected data collection sheet and explanations with deadline for input 19 April 2019**
- **Synthesis of data will be made available by 30 April 2019**

Assessment of Alternatives (AoA): 1st draft

The first draft AoA paper is intended to provide elements to address a policymakers' question about the existence or not of alternatives to lead in PM refining/recycling. It starts from the UNEP 'Metal Wheel' and tries to build on its implications for the PM refining (role of Pb and complementarity of Pb, Cu and Ni as the three main collector metals).

A first challenge to industry will come if Pb metal is proposed for prioritization. Industry will be asked during the Public Consultation to provide indications on the existence of alternatives. Irrespective of its strategy regarding authorisation (Process ends up in “manufacturing of Pb” => no authorisation), Industry will want to raise the fundamental questions about the meaningfulness and proportionality of putting a base metal on Annex XIV and the extremely wide implications of such an action.

The two major roles of Pb in PM refining/recycling are discussed in the draft AoA paper:

- **Fire Assay:** The aim is to point to the fact that companies are combining analytical methods and that fire assay has its specific role which is critical from a commercial and reliability point of view.
- **Pb as collector in processes:** Currently based on the flows of two major refiners, the role of Pb and the interlinkage with Cu and Ni (the other collector metals, outsiders might think these could be alternatives...) are illustrated.

During this discussion, the link was made with the SOCRATES network of academics (see below) that recently published a Policy Brief titled “Lead Metallurgy is Fundamental to the Circular Economy”



(available at <https://kuleuven.sim2.be/wp-content/uploads/2019/02/SOCRATES-Policy-Brief-2019-Lead.pdf>). Socrates offered to provide input during the public consultation, and to review ILA / EPMF documents. The participants agreed that EPMF can ask SOCRATES to review the AoA paper and possibly provide some additional arguments

ACTIONS:

- **Companies are invited to review by 6 May 2019 the first AoA draft, checking if data, arguments and wordings are correct in their view.**

SOCRATES: outcome of meeting

EPMF attended a meeting with the *European Training Network for the Sustainable, zero-waste valorisation of critical-metal-containing industrial process residues* (SOCRATES) which targets ground-breaking metallurgical processes that can be integrated into environmentally friendly, (near-) zero-waste valorisation flow sheets. SOCRATES wants through the collaboration of several universities and industry scientists to contribute to a more diversified and sustainable supply chain for critical metals (<https://etn-socrates.eu/>).

The aim of the meeting was to explore how SOCRATES could strengthen the technical messages but also the Circular Economy arguments produced by ILA and other Pb-using sectors with the production of expert statements. SOCRATES could provide

- a more scientific assessment on the interlinks (vs. intersubstitutability) between the Pb circuit, the Cu circuit and the Ni circuit,
- data showing that 'diverting' the Pb stream to the other streams risks poisoning them,
- provide a picture of the industrial symbiosis of the non-ferrous metals value chains in the EU (cf. "Flanders metal valley" concept)

All these elements would strengthen the Industry's case on the Circular Economy.

ACTIONS:

- **EPMF to check with Socrates what input they could provide for the AoA document and any other useful data for the Public Consultation**
- **EPMF to ask Socrates to review the EPMF documents**

Pb/PbO Platform Budget and Workplan 2020

A first indicative figure was provided on the possible budget to cover "Pb and Pb compounds authorisation" in 2020, i.e. 100.000 €.

The Secretariat will be in a position to provide a more accurate estimate of the 2020 budget during the December GA meeting, once the expenses for 2019 and budget overflows will be better known.

Conclusions

Next meeting is scheduled for June 2019 with date to be confirmed (Conference Call or physical meeting around the GA meeting of 5-6 June 2019).



Annex 1: Participants

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France CAPON, EPMF (Belgium)
Sylvaine DUARRI D'HAENE, Umicore (Belgium)
Michael HUBER, C. Hafner GmbH (Germany)
Jelle MERTENS, EPMF (Belgium)
Jörn MÜHLENFELD, Aurubis (German) – *via conference call*
Nissanka RAJAPAKSE, Johnson Matthey (United-Kingdom)
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Apologies

Simona LAI, Varinor (Switzerland)