



Refinables Work Group Meeting

Minutes, Brussels, 2 April 2019 (13:00-16:00 CET)

Chairs: Sylvaine Duarri D'Haene (Umicore) and Daniela Cholakova (Aurubis)

1. Welcome and Introduction

1.1. Reminder on Confidentiality and Competition Law

Participants are reminded on their obligation to comply with Confidentiality and Competition Law.

1.2. Tour de table and apologies

The list of participants is available in Annex 1.

1.3. Approval of the agenda

The agenda is approved as distributed and is available in Annex 1 and on slide 4 in Annex 2.

1.4. Approval of the minutes of last meeting (B2B, 11/10/2018) and status of action points

No remarks / additions; minutes of the meeting of 11 October were approved. A table with the status of the action points from this meeting is available on slide 5 in Annex 2. All action points have appropriately been addressed / are ongoing where possible or will be discussed in this meeting.

2. Election Chair

The replacement of Michiel Ceulemans (Umicore) by Sylvaine Duarri D'Haene (Umicore) as new chair of the Refinables WG is approved by the WG members.

3. Refinables Scoping

Currently there are 21 Refinables dossiers (cf. slides 10-11 in Annex 2): suggestion to remove Gold Doré from scope + some changes in LR and tonnage bands.

Doré

It was previously decided to split Doré in Gold Doré and Silver Doré but as there is no interest anymore in Gold Doré this dossier will be removed from the scope. The Ag Doré will be a refinement of Doré dossier instead of a split. As Umicore was LR of Doré they will remain LR of the refined dossier. Aurubis, previously assigned as LR for Ag Doré, agreed to resign/step back from this role.

Some discussion was held on whether to change the name of the dossier to Ag Doré, finally it was agreed to leave the name as it is but to refine the description of the substance.

Iron bullion, Copper bullion

In the previous WG meeting (Oct 2018), it was decided to consider these as new dossiers.

Heraeus is preparing the required information for the iron bullion dossier and registration should be done by first submitting an inquiry **(A1)**.



For copper bullion, members are asked to confirm their interest and a LR needs to be identified/assigned (A2). Also, it was agreed to check, upon having all details for the Cu bullion, whether it would fit under one of ECI's UVCBs.

It would make sense to, in general, always contact other consortia (Cu, Zn, Fe...) to check for overlaps of UVCBs (A3). This has been already considered by and could be a role for Eurométaux. MISA is a good opportunity to do this.

Tonnage band increase

For 9.3 Materials for reclaim, PM production by-products a member registrant wants to increase their tonnage band above the current joint submission tonnage band. The procedure for this is summarised on slide 14 in Annex 2. Costs are only for the member registrant that changes the tonnage. No objections were made by the WG members. Approval from the Assembly will be asked upon confirmation of the registrant need.

Tonnage calculations for solutions

Aurubis recommended to include the water/solvent content in tonnage calculations and SIPs as this is also done in other consortia and doesn't affect the PGM guidance.

The WG agreed but requested to summarize current tonnages of Refinables solutions (Annex 3).

LR changes

As a result of the Brexit, LR changes are needed to replace Johnson Matthey for the following substances: 7 Flue dust, PM refining (CAS 98072-44-7, EC 308-496-3); 9.1 Materials for reclaim, PM with or without support (CAS 98072-70-9, EC 308-526-5); 9.2 Materials for reclaim, PM in bricks, crucibles, trays, etc. (EC 931-674-2); 9.3 Materials for reclaim, PM production by-products (EC 931-663-2). Proposed new LRs (cf. slide 16 in Annex 2) were approved by the WG. The move to the new LRs should be done by 12th April 2019 (A4).

4. Substance Identity (SID) of PM Refinables

4.1. Update on iUVCB SID discussions with MISA

The phase 1 discussions and inquiries on SID are reaching the end as after preparatory discussions and exchanges an updated SID guidance and Annex were provided to ECHA in December 2018. Feedback is expected any moment. No major changes are envisaged to be requested. Next phases that will be tackled are reviewing the risk assessment approach and addressing combined toxicity and man via the environment. In October a 3rd MISA workshop focussing on UVCBs will be held in Belgium. (A5).

4.2. Status of SIPs and decision tree

SIPs

SIPs for most dossiers have been updated. For Residues of PM leaching and precipitates of PM SIPs still have to be finalised. LRs will be tasked to take the lead in drafting SIPs (A6).

Decision tree update

Heraeus took the lead on updating the decision tree. Full details are provided in Annex 4. Slides 20-21 in Annex 2 only summarize changes. Allocation of the new dossiers for solutions from PM leaching under leaching and dissolution was approved by the members. Discussion and disagreement arose on the level of detail (too much or not?) of the update and whether these



contribute to its aim to clarify SID with ECHA. Finally, it was decided to avoid and replace 'waste' terms by 'out of Refinables scope'. Also, it was agreed to only use the decision tree internally at this point. Upon request/need by ECHA to provide the decision tree, this will be re-discussed and can be reconsidered by the WG.

5. Status Refinables Updates

An overview of the prioritised dossiers is given in the below Table 1. The Au Doré has been removed from the Refinables scope.

Table 1. Overview of prioritised Refinables dossiers.

Name	EC number	Tonnage band	LR
1.1 Gold Doré	-	10–100	Umicore
1.2 Silver Doré	273-793-6; 69029-47-6	≥ 1000	Aurubis → Umicore
2 Matte, PM	308-506-6; 98072-52-7	≥ 1000	Glencore Nikkelverk AS
3.1 Slags, doré furnace	266-975-1; 67711-98-2	≥ 1000	Umicore
3.2 Slags, production of PM containing materials other than doré	308-515-5; 98072-60-7	≥ 1000	Umicore
7 Flue dust, PM	308-496-3; 98072-44-7	≥ 1000	JM → Aurubis

5.1. Environmental and Exposure Assessment

Cf. slides 23-24 in Annex 2.

Updated CSRs for the prioritised dossiers are ready and were provided to the specific members.

As company data dates from 2013-2014, later dossier registrants are not covered. For both current and future CSRs, the members will be informed and allowed to provide data as to cover all registered substances. Previously used template questionnaires will be provided (A7). A new, complete update of available site-specific data is not foreseen and not considered of high priority before registration of the dossiers.

Regarding ES communication exchange: DUs are quite limited.

As the CSR is site (and not product) specific, it is not submitted by the lead for all joint registrants. Companies have to submit their own site-specific CSRs in IUCLID (A8).

5.2. Classification

Classification of the prioritised dossiers was updated. The general approach followed is summarised on slide 25 in Annex 2.

Detailed generic (and company-specific) classification results will be provided to the registrants (A9). Suggestions for classification grouping, substance-by-substance based, will be sent for



approval. The proposal is to minimize sub-classifications as much as possible as company-specific (lower) hazard classification can always be registered and used for SDS.

Following Eurométaux guidelines, classification of the generic composition uses max of typical. For individual classification, max of max is used as to ensure worst-case coverage. Therefore, individual classification in some cases is more severe than the generic. For those refinables where individual classification is more severe, the generic (max of typical) composition of the classification drivers will be corrected (max of max) to ensure that all classifications are covered.

Regarding 3.2 Slags, production of PM containing materials other than doré, Glencore informed that it is testing their substance to remove the skin corrosion hazard classification and is willing to share the results if useful for the registration.

Also TDp testing is still planned to be performed for the Slags which will affect the current preliminary hazard classification.

5.3. Timeline

Foreseen timing of all APs of the prioritised dossiers is summarised on slide 32 in Annex 2.

6. Workplan and Budget 2020

Cf. slides 34-36 in Annex 2.

Main tasks in 2020 are the update of the 15 non-prioritised refinables dossiers. The proposal to, in general, first finalise the most complete, not splitted or new, dossiers was approved by the WG. Flexibility in prioritisation upon need/request is possible but some sequence order obligations exist to ensure that everyone is covered by the current registrations.

The draft 2020 budget was presented and approved by the WG members. Most costs are related to REACH dossier maintenance and MISA. REACH dossier maintenance comprises updating the CSRs and IUCLID files for the 15 refinables dossiers (phys-chem needs were budgeted in 2019). MISA budget is set aside to allow, if necessary, acting on additional requirements.

7. AOB, next meetings/calls and closing remarks

An overview of all substances with reference codes was asked as to inform, upon splits, which substances take over previous identifiers and which will get new ones (Annex 3).

Next meetings:

- EPMF General Assembly: 5-6 June 2019, Bordeaux, France
- Autumn Back-to-Back meeting: 8-10 October 2019, Brussels, Belgium
- EPMF General Assembly: 3 December 2019, Brussels, Belgium

8. List of actions

Table 2. Actions agreed on at the Refinables WG meeting of 02 April 2019.

[A]	WHAT	WHO	WHEN
1	10.2 Iron bullion dossier registration	Heraeus + EPMF	Q2 2019



2	10.3 Copper bullion – assign LR	EPMF	Q3 2019
3	Contact other consortia (Cu, Zn, Fe...) to identify substance overlaps	EM/EPMF	continuous
4	Move Johnson Matthey LR dossiers (7, 9.1, 9.2, 9.3) to new LRs	EPMF	12 April 2019
5	Follow-up and give input for the iUVCBs under MISA	EPMF	continuous
6	Drafting of SIPs for PM leaching and dissolution dossiers (4.4, 6.3, 6.4) and 4.4 Precipitates from PM refining	LRs	Q3 2019
7	ES data gaps – distribute inquiry templates to allow submission missing data	EPMF	Q2-Q4 2019
8	Check submission company specific CSR	members	
9	Provide classification details prioritised dossiers (1.2, 2, 3.1, 3.2, 7)	EPMF	Q2 2019
10	Finalisation update & registration of prioritised dossiers	EPMF + LR	Q4 2019

9. List of Annexes

1. Agenda & list of participants
2. Slides presented at the meeting
3. Overview refinable dossiers
4. Update decision tree



Annex 1: Participants

Angela ALDERMAN, Johnson Matthey (United-Kingdom) – *via conference call*

Katrien ARIJS, Consultant for EPMF (Arche, Belgium)

Roland BRASCH, Heraeus (Germany)

France CAPON, EPMF (Belgium)

Daniela CHOLAKOVA, Aurubis (Belgium)

Sylvaine DUARRI D'HAENE, Umicore (Belgium)

Herbert FUCHS, Heraeus (Germany)

Jörn MÜHLENFELD, Aurubis (German) – *via conference call*

Agnieszka PIECHOTA, KGHM Polska Miedz (Poland)

Christoph RÖHLICH, Heraeus (Germany)

Hege STUBBERUD, Glencore Nikkelverk (Norway)

Mika TOIVOLA, Boliden (Finland)

Steven VERBERCKMOES, Umicore (Belgium)

Aurine VERKEST, Consultant for EPMF (Arche, Belgium)

Paul YLIOJA, Johnson Matthey (United Kingdom)

Apologies

Michiel CEULEMANS, Umicore (Belgium)

Simon LAI, Varinor (Switzerland)