



EPMF conference call

Materials for Reclaim

Minutes 19 May 2020 (14:00-15:30 CET)

Participants: Roland Brasch, Herbert Fuchs and Christoph Roehlich (Heraeus), Sylvaine Duarri D'Haine (Umicore), Amelia Hinchcliffe, Graeme Langlands, Elaine McColgan and Larissa Silver (JM), Michael Seebauer (WE), Aurine Verkest (Arche for EPMF)

Apologies: France Capon (EPMF)

These minutes summarize the main discussion points and agreements of the call, and should be considered together with the agenda, slides and background documents (ID cards) circulated to the group ahead of the meeting.

Aurine Verkest welcomed all participants, highlighted the main aim of this call, being the introduction of a pre-treatment operation in the Materials for Reclaim (MfR) descriptions, and gave the word to Roland Brasch representing Heraeus, the lead registrant of the three MfR Refinables dossiers, to detail their proposals for the refinement and improvement of these dossiers.

Proposition

Roland Brasch introduced the history of the dossiers originating from the 2008 "Waste solids, PM refining" Art 17/18 dossier till three "Materials for Reclaim" Art 10 dossiers registered in 2014. He explained how in 2019 dossiers updates for the change of the Lead Registrant role failed due to (in part) poor substances descriptions (manufacturing process).

Improving MfR substance descriptions and providing manufacturing process information is a challenge as their current descriptions position these substances at the interface of REACH and end-of-life/waste. Heraeus suggests, as lead registrant, to resolve this by including a recovery operation/treatment process in the description of these substances. Backed up by 'ECHA's guidance on waste and recovered substances', this refinement would justify the existing REACH registration of the MfRs and allow to provide substance manufacturing process descriptions required for successful registration updates.

The position of the MfRs after pre-treatment in the PM recycling flowchart and PM recycling decision tree was visualised and explained.

Possible mechanical and thermal recovery operations were listed that allow improvement of the current MfR descriptions and allocate these substances under REACH.



EPMF asks all co-registrants to investigate the validity of the Heraeus proposal to include a pre-treatment operation in their MfR substance manufacturing process. Upon agreement/approval of this, further refinement/improvement of the MfR descriptions, naming and identity documents (SIPs, ID cards, decision tree) to remove inconsistencies and clearly meet the REACH iUVCB requirements can be undertaken. Also, revision of grouping and sub-grouping should be made depending on material types and pre-treatment processes. Heraeus will take the lead in providing these next step proposals.

Discussion & conclusion

EPMF follows the logic of the proposal of Heraeus to include a pre-treatment operation in the MfR substance descriptions and will fully support it upon approval of all co-registrants.

All participants agreed with the principle and will verify its applicability on their MfR substances.

On the next steps, some preliminary ideas were shared on ways to improve/revise terminology/definitions (e.g. by-products) and to (sub)group based on materials and/or pre-processing.

ACTION: co-registrants to (re-)confirm to the EPMF Secretariat their approval regarding the inclusion of mechanical/thermal recovery operation in the manufacturing process of Materials for Reclaim substances by 29 May COB