



European Precious Metals
Federation

European Precious Metals Federation

Silver Advocacy Task Force

12 December 2019 | Webinar

Rules



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Agenda

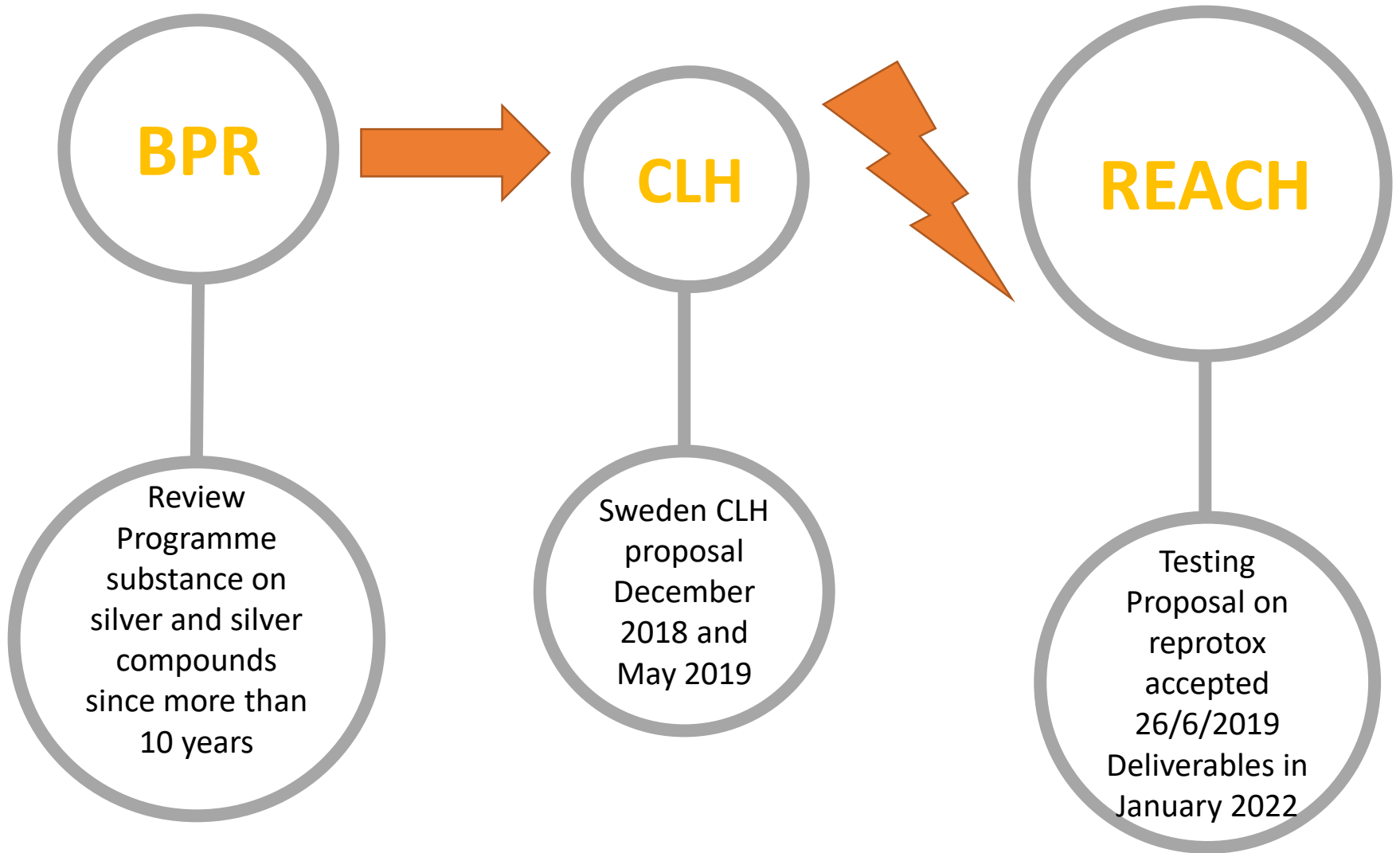
- Welcome and Introduction
- Status of silver and silver nitrate CLH proposal
- Silver advocacy TF website
- Q&A on silver
- Eftec Impact assessment: scoping study
- Conclusions



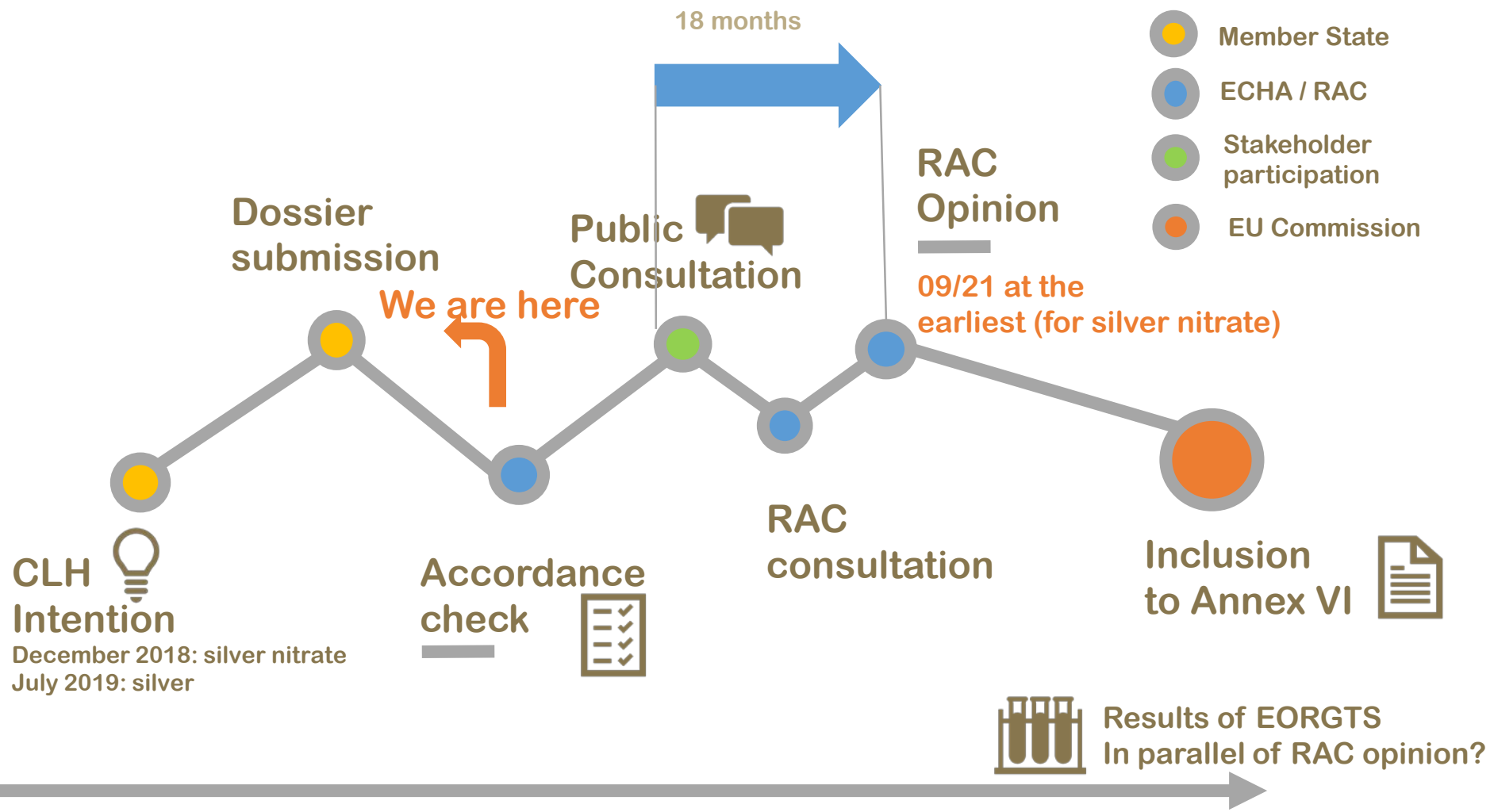


State of play

Interaction between REACH/CLH and BPR on silver



Silver CLH Advocacy strategy: the process



Impact on Advocacy first Milestone

Success: Commission and ECHA agree to delay public consultation start

Timing: now to end Q1 2020?

Leverage scientific concerns

Play to DG ENV and ECHA concerns

- Continue informal discussions

Place on public record state of science

- Independent article on science around silver for placement in peer review journal

Scientific symposium (2020)

- Symposium on first public results, TK results
- Trade media outreach

Depending on when Kemi resubmits its CLH dossiers, re-engage with interested MSCAs from TP phase to encourage to submit to public consultation

- Reach out to PL, IT, FIN, DE

Depending on when Kemi resubmits its CLH dossiers, Activate third country regulators to submit to public consultation

- Outreach to CH, NO, India, NZ, RSA, US, OECD

Activate value chain

Establish coordination mechanism with DUs

- Regular update calls scheduled - DONE
- Online Platform - DONE

Promote broad participation in public consultation

- Prepare template for public consultation responses

Prepare for joint outreach to MSs in next phase

- Map political and economic footprint – create joint DU/Silver teams
- Prepare materials pack for advocacy use by all actors (Strat on page, Messages, Q&A, Standard Deck, Summary of SEA)

Elevate to political level

Take the pressure off BPR - TBC

- Find policy dissonance/application that is under threat of interest to DG SANTE
- Outreach to DG SANTE hierarchy

Underline benefits of silver

- Create visual representation of contribution of silver to VdL/European Green Deal political agenda
- Outreach programme to incoming cabinets around critical applications/positive policy agenda
- Outreach to MEPs as part of MetalsWithAmbition weeks





Silver Advocacy TF website

Silver CLH Advocacy strategy: the online platform



Protected: Silver Advocacy Task Force

Welcome to the dedicated Silver Advocacy Task Force page.

Members, please note: All of these files are also available within the Silver WG folder in the Member Area.

Kemi (the Swedish Chemicals Agency), proposed the following classification for silver and silver nitrate :

- Skin Sens. 1, H317
- Muta. 2, H341
- Repr. 1B, H360FD
- Aquatic Acute 1, M-factor=10 (powder <1mm) and M-factor=1000 (powder <0.0001mm)
- Aquatic Chronic 1, M-factor=10 (powder <1mm) and M-factor=100 (powder <0.0001mm)

To address this new regulatory challenge, EPMF has decided to create a Silver Advocacy Task Force including all stakeholders (producers, downstream users, end users, national federations) who want to join forces. All the relevant documents for this Task Force are available on this page. Please note that these documents are the property of EPMF and cannot be circulated without prior consent of EPMF and must be kept confidential.






We hope that this page will facilitate the work of the Task Force serving as a reference library.

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Silver CLH Advocacy strategy: the online platform

Silver Advocacy Task Force files

- ▼ [Meetings](#)
 - ▼ [2019 12 12](#)
 -  EPMF Silver Advocacy Task Force - Agenda, dial in details and list of participants
 - ▼ [2019 11 07](#)
 -  EPMF Silver advocacy workshop conclusions
 -  EPMF Silver advocacy workshop attendance list
 -  EPMF Silver advocacy workshop presentation
 -  eftec questionnaire
- ▶ [Advocacy Material](#)
- ▶ [Impact assessment](#)
- ▶ [Timelines](#)
- ▶ [Q&A](#)

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Q&A on silver CLH process

List of questions

1. What classification has been proposed for silver?
2. Which substances will be impacted by the silver CLH proposal submitted by Sweden?
3. Why is silver and its compounds proposed for a hazard classification at EU level?
4. Why would a proposal submitted in the context of the Biocidal Products Regulation (BPR) impact silver and silver compounds used in other applications?
5. Does EPMF support the silver CLH proposal made by Sweden?
6. Does this mean that silver is dangerous?
7. Will silver be banned in the future?
8. What would be the impact of the CLH proposal on the EU silver market?
9. What is the process to decide on this classification and when will we know if silver will receive a classification?
10. What are manufacturers and downstream users doing within this process?
11. What do suppliers need to do now and in the future?
12. What role can EPMF play in the CLH process?



Where to find it?

Silver Advocacy Task Force files

- ▼ [Meetings](#)
 - ▼ [2019 12 12](#)
 - PDF EPMF Silver Advocacy Task Force - Agenda, dial in details and list of participants
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Eftec Impact assessment: scoping study

Impact Assessment of silver and silver compounds

Silver advocacy task force webinar / 12th December 2019

Rohit Mistry; Adams Koshy;
Thea Sletten; Oliver Pilkington

Agenda

1. Overview of scoping note
2. What input do we from you?

Purpose of Scoping Note

Scoping note is to consolidate eftec's understanding of:

- The scope of the classification to be assessed;
- Legislation triggered as a consequence of the classification;
- The uses of silver and its compounds;
- Possible alternatives to silver and its compounds;
- The EU market at risk; and
- The population affected by the proposed classification.



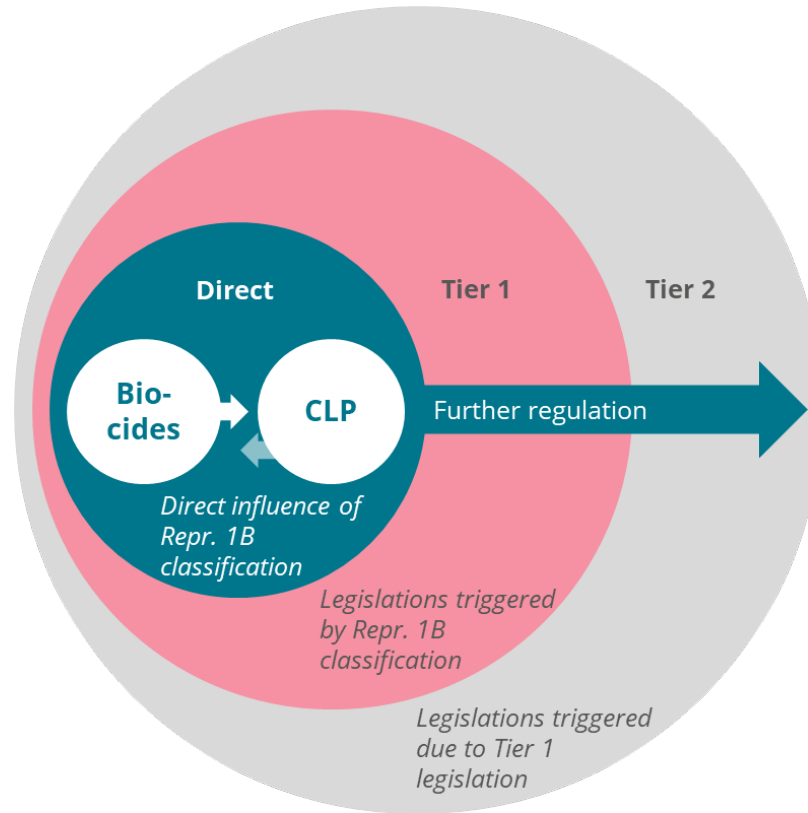
Focus of scoping note was on the **availability of information** on these topics.

Scope of impact assessment

The direct and indirect impacts on the manufacture and use of silver metal and eight silver compounds from a possible harmonised classification of Category 1B Reproductive Toxicant (Repr. 1B) within the EEA and Switzerland. This will cover the net costs incurred by different actors of the proposed classification, as well as a qualitative assessment of the potential risk reductions and benefits of the classification. The time period of the assessment will be confirmed in the follow-up tasks of the project.

	Availability of information	Level of detail / robustness	Missing information
Substances	Good information on the identity of substances	Sufficient detail on why the substances have been this study. Data based on official registration and communication with EPMF	NA
Classification	Good information on current and classification of the substances assessed	There is sufficient detail on the scope of impact However, there is currently no supporting concerning the EPMF position on each proposed classification	Supporting documentation from its position on these classifications
Geography	Good information on the selection countries	Sufficient detail on why the countries have been this study. Data based on communication with	NA
Time period	Insufficient information to decide on preferred approach	Possibility for either a cumulative time period or an basis	Time period to be finalised ahead of the project. Pros and cons of discussed

Industry-wide legislations triggered



Forms of legislation and legal requirements

Types of legislations

- General chemicals legislations
- Worker protection legislations
- Environmental protection legislations
- General industrial legislations
- Sector-specific legislation

Types of legal requirements

- A ban
- A concentration limit
- An (H&S) assessment
- Labelling
- Implementation of risk management measures
- Monitoring programme
- Training procedures for workers

Uses of silver and silver compounds

- Manufacture of silver and silver compounds (*including recycling*) *
- Manufacture of other chemical compounds (including catalysts) *
- Aerospace *
- Automotive
- Cosmetics *
- Electronics and electrical equipment (*not used in aerospace and automotive*) *
- Investments
- Jewellery and luxury items/finishes *
- Medical *
- Mirrors
- Photographic *
- Photovoltaic
- Silverware *
- All **other** consumer uses
- All **other** industrial uses

For each use the scoping note sets out:

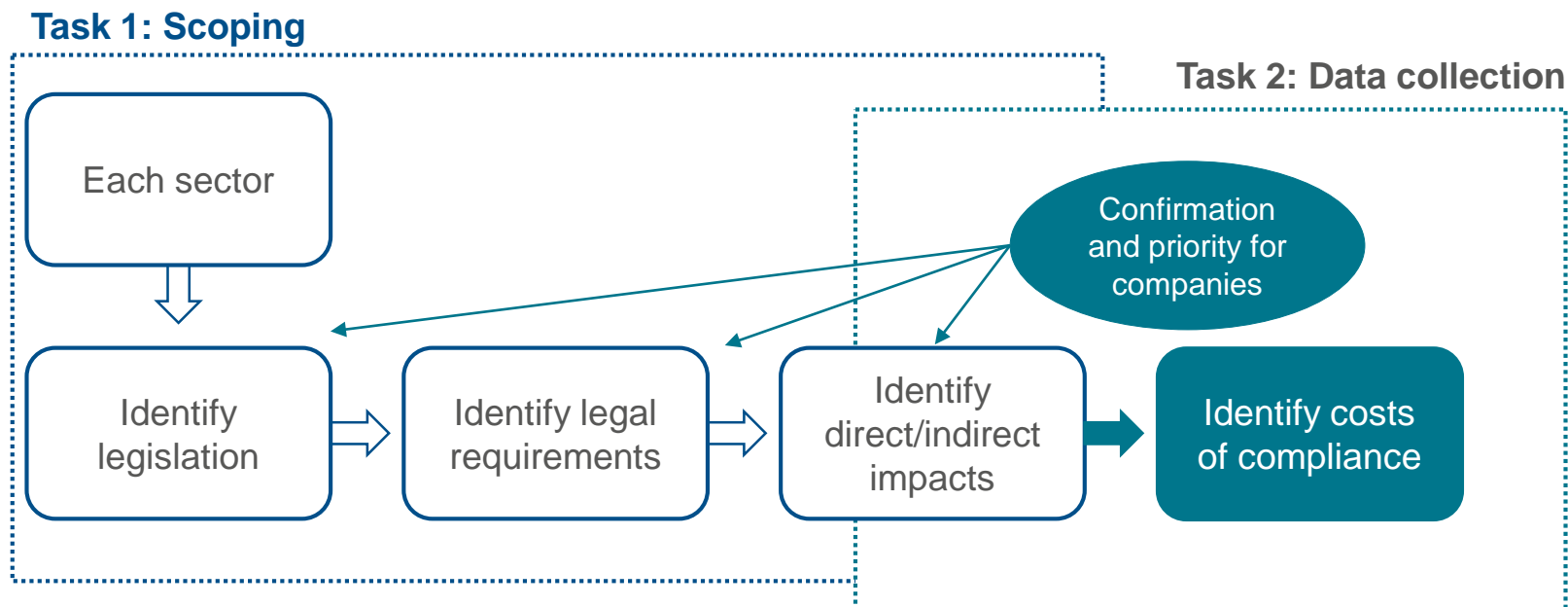
- Known silver substances
- Specific uses
- Technical function(s)
- Potential alternatives
- Additional sector-specific legislation
- EU markets at risk

* Refers to uses that will be reported in separate chapters for the impact assessment. Note, 'Jewellery and luxury items/finishes' and 'Silverware' will be combined into one chapter. All other uses will be included in either 'All other consumer uses' or 'All other industrial uses'.

Overview of information on uses of silver and its compounds

Information	Availability of information	Level of detail / robustness	Missing information
Volume / imported	Some data from EPMF total volume	Information is from 2015/16 and does not cover silver compounds	<i>Updated volume information on all silver substances</i>
Volume used	Limited data on volume in use	Limited quantitative information from various specific uses and/or substances	<i>Updated volume information on all uses</i>
Substances used	Some data available on substances in use	Examples of substances included, but unclear if comprehensive list	<i>Consistent information on substances used, linked to</i>
Specific uses	Good data on list of possible specific uses within sectors	Limited information on some specific uses (e.g. purification)	<i>Confirmation on specific uses</i>
Technical function	Good data on technical	Generic description of function, by specific use	<i>Confirmation of technical function</i>
Alternatives	Some data on possible alternative substances for use	Focus of data collection was on identifying substances and not their suitability	<ul style="list-style-type: none"> • <i>Confirmation on whether any substances are</i> • <i>Commentary on alternative process/product</i> • <i>Information required on feasibility of alternatives</i>
Legislation	Good data on legislation	Identification of possible legislation triggered, requirements and impacts	<ul style="list-style-type: none"> • <i>Confirmation on legislation triggered, requirements impacts</i> • <i>Information required on costs of compliance</i>
Market at risk	Only high-level information markets at risk	Limited information directly linked to silver and compounds in each use	<ul style="list-style-type: none"> • <i>Additional information collected on silver-specific</i> • <i>Information required on workers affected</i>

Approach



Populations affected

Refers to actors that are likely to be affected by the proposed Repr. 1B classification.

To evaluate this, it is important to first identify **how** the silver compounds are transmitted into the body, **what** the impacts of the suggested reproductive toxicity are and **who** is affected.

	Availability of information	Level of detail / robustness	Missing information
Exposure routes	No clear information on exposure routes reproductive toxicity end-point	Available information on exposure in incomplete No information available on exposure 1B	<i>Request information from EPMF exposure routes to Repr. 1B and type of information is expected EOGRTS</i>
Health impacts	No clear information on health impacts reproductive toxicity end-points	Available information on health indicated that there is insufficient indicate the presence of reproductive except for the Sprando et al. study	<i>Request information from EPMF health impacts and what type of information is expected from the EOGRTS</i>
Exposed population	No clear information on population the reproductive toxicity end-points	No information found on this aspect of population affected	<i>Request information from EPMF exposed population</i>

Summary and next steps

Aspect of study	Information	Data collection approach
Scope	Substances	Sufficient data
	Classification	Additional commentary by EPMF
	Geography	Sufficient data
	Time period	To be confirmed ahead of Task 3
Use	Volume manufactured / imported	Survey to collect updated volume information on all silver substances
	Volume used	Survey to collect updated volume information on all uses
	Substances used	Survey to collect updated information on substances use, linked to broad use
	Specific uses	Survey to include open-ended question on specific uses
	Technical function	Survey to ask for technical function – dropdown in questionnaire with 'other'
	Alternatives	Survey to collect information through open-ended question on alternative substance,
	Legislation triggered	<ul style="list-style-type: none"> Survey to present respondents with information on legislation and ask for any Survey to ask respondents on priority legislation Survey to ask respondents for costs of compliance
Market at risk	Additional research to be conducted and refined in Task 4 following data collection	
Population affected	Exposure routes	<ul style="list-style-type: none"> Additional information requested from EPMF, including on outputs from EOGRTS
	Health impacts	<ul style="list-style-type: none"> Survey to collect information on number of workers employed, exposed to silver and suspected exposure
	Exposed population	<ul style="list-style-type: none"> Additional research to be conducted on population affected in Task 4

- No additional data required
- Specific data request from EPMF
- Additional research to be conducted by eftec
- Data to be collected in industry survey

What input do we from you?

Task 2

Dec 2019 - March 2020

1. **Two companies / associations** to pilot test our survey and interview questions (Dec)
2. **All companies / associations** to fill in our survey (Jan-Mar)
3. **10 companies / associations** to take part in an interview (Jan-Mar)

Task 3

March - April 2020

4. **All companies / associations** respond to queries we may have on your survey responses
5. **10 companies / associations** to confirm interview reports


Task 5

May/June 2020

6. **All companies / associations** to read the specific chapter on your sector
7. **All companies / associations** to provide feedback at sector webinar and/or in writing

Thank you

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Conclusions



THANK YOU

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