

PIG IRON & REACH

D.Filion on behalf of

URC (UGI – HPI REACH Committee):
Pig Iron produced from Ilmenite ore



IPIA – Miami conference, January 30, 2008

Pig Iron & REACH

❖ **Antitrust / Introduction:**

Pig Iron from Ilmenite ore is produced at RTIT: QIT & RBM; Exxaro, Namakwa & Tinfos smelters); with a REACH working group called URC (UGI – HPI REACH Committee); DF coordinator & Mr. Yves Pépin RTIT chairman.

- **REACH substance registration requirements > 1000T**
- **Health, Environmental:** Consultants to contract, data gaps, tests, CSR, exposure data in the work place soil, air, water, sediment, IUCLID 5 etc.
- **Pre-registration Nov. 2008**
- **Next meeting / Collaboration URC / IPIA & other associations like Eurofer, Arcelor, CEFIC, mining companies.. Pig Iron Consortium or Working group?**

REACH Pig Iron Substance Registration > 1000T

REACH TECHNICAL ACTIVITIES: Physicochemical Properties and ENVIRONMENT & HUMAN HEALTH TASKS



ESIS European Chemical Substances Information System

EC 265-998-4 : Iron, furnace

- Under Classification and Labelling information it is mentioned:
 - This chemical is not classified in the Annex 1 of Directive 67/548/EEC.
 - European Priority list and Risk Assessment Info: This chemical is not listed in a priority list.

Pig Iron from Ilmenite ore

Mono constituent 90-96% with impurities (silicon, manganese, nickel, chromium...) / IPIA pig iron similar to pig iron produced by ilmenite ore

Health

✓ Consultants need to be contracted

Examples of what will be required:

- Read across with Fe data will be used – therefore, important to collaborate with Eurofer (even if no Fe consortia!), Cefic and other associations to obtain the Fe data
- For Pig Iron, ideally start Data gathering, phys. Properties, & testing in 2008 (not delay to 2009 with SIEF / REACH)
- Establish the testing required (bio accessibility, dustiness etc. approach based on Life Cycle of the product)
- Exposure scenarios: Manufacturer to DU (exposure data in the work place, air ..)
- Risk Assessment: to establish the risk management for safe use & to improve pig iron MSDS - GHS

For reference, on HERAG, please see EBRC Website

Environment

✓ Consultants need to be contracted

- However based on iron powders testing & iron sulphate / chloride (liquid Fe most soluble form); which obtained no classification in EU,

➤ Pig iron should not be classified under GHS.

CANMET T/D p Transformation Dissolution protocol

Maybe one test could be performed on pig iron with the highest impurities

In general, a lot of env. tests will be waived for pig iron.

- Environmental Risk Assessment (should be performed end 2009-2010)

Legal Entity

Sole Representative for Non-EU Manufacturer

- To appoint a Sole Representative in EU as soon as possible for each producer:
 - For RTIT, it will be the **Rio Tinto London office**
- When Sole Representative is used, Customers are Downstream users DU (ex.TDMA etc.)

Legal Entity ex. Tinfos in Norway

Considered as part of EU under REACH

Pre-Registration Data Requirements

3 possibilities: Web based (REACH IT), IUCLID 5, XML file (excel, SAP etc.)

- **Chemical name**
- **Other name (usual, trade name, abbreviation)**
- **EINECS number if available and appropriate**
- **CAS number If available**
- **CAS name**
- **Other identity code (if available)**
- **Name of Potential registrant**
- **Address**
- **Name of contact person**
- **Name and address of the third party representative where appropriate**
- **Envisaged deadline for registration**
- **Tonnage band**
- **Substance(s) which you intend to use for read-across approach or Q(SAR)**

Quantitative) Structure-Activity Relationships [(Q)SARs] are methods for estimating properties of a chemical from its molecular structure and have the potential to provide information on hazards of chemicals, while reducing time, monetary cost and animal testing currently needed.

REACH Dossier - IUCLID 5

- Will need to establish the consultant that will prepare the pig iron dossier for IUCLID 5;
For the Joint Submission / SIEF
- **However, Who will be the lead Registrant?**
Main process steps – draft proposal:
 - Lead registrant submits required Registration Dossier to ECHA
 - Ticket number is sent by ECHA to lead Registrant
 - Lead Registrant distributes Ticket number to SIEF members
 - SEIF members submit company registration dossier to ECHA system.
- CSR – RA to be add on to IUCLID 5 (will be available only end of 2009, beg. 2010)

- ❖ Next Meeting / Collaboration URC & IPIA ...
- ❖ Consortium or Working group? Need to start Now!
- ❖ Thank you for your attention!
- ❖ Questions?

