

Subject: **REACH Authorisations granted for certain Hexavalent Chromium Compound Aerospace and Defence uses**

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## Overview

GCCA has been informed by the European Commission that on 9–10 July 2019, the European Commission voted to approve the REACH authorisations sponsored by the Global Chromates Consortium for Aerospace (GCCA) covering use of **chromium trioxide**, **sodium chromate**, **potassium dichromate** and **sodium dichromate** containing products imported into the EEA for aerospace and defence use, granting a 7-year review period from the Sunset Date of 21 September 2017. Detailed descriptions of the specific uses covered by the GCCA's REACH authorisations are included in Table 1.

Table 1. Specific uses covered by approved GCCA REACH authorisations

Substance Name	CAS NO	EC No	Use	Authorisation Holder & Links
Chromium trioxide <sup>1</sup>	1333-82-0	215-607-8	<b>Chemical conversion and slurry coating applications</b> by the aerospace sector <sup>2</sup> , where any of the following key functionalities or properties is necessary for the intended use: corrosion resistance, active corrosion inhibition, adhesion promotion and reproducibility (for chemical conversion coating), corrosion protection, heat resilience, hot corrosion resistance, resistance to humidity and hot water, thermal shock resistance, adhesion and flexibility (for slurry coating) <sup>3</sup>	Wesco (Application ID <a href="#">0096-01</a> )  <a href="#">Draft EC Decision</a>
Sodium chromate	7775-11-3	231-889-5	<b>Formulation of mixtures</b> for sealing after anodizing, chemical conversion coating, pickling and etching applications by the aerospace sector <sup>2</sup> <b>Sealing after anodizing, chemical conversion coating, pickling and etching applications</b> by the aerospace sector, where any of the following key functionalities or properties is necessary for the intended use: for the pickling/etching	Aviall <sup>5</sup> and Wesco (Application ID <a href="#">0099-01</a> and <a href="#">0099-02</a> )  <a href="#">Draft EC Decision</a>

<sup>1</sup> This authorisation covers only liquid formulations

<sup>2</sup> Aerospace sector includes companies principally engaged in carrying out the design, development, manufacture, maintenance, modification, overhaul, repair, or support of civil or military aerospace and defence equipment, systems, or structures, plus any derivative uses.

<sup>3</sup> The authorisation for the use of chromium trioxide is not granted for chemical conversion and slurry coating applications by the aerospace sector where none of the key functionalities listed in the use is necessary for the intended use.

<sup>5</sup> Aviall is also an applicant for additional chromate authorisations, including Chromium trioxide ([0032-01](#), [0032-02](#), [0032-03](#), [0032-04](#), [0032-05](#), [0032-06](#)), Strontium chromate ([0046-01](#), [0046-02](#)), Potassium hydroxyoctaoxidizincatedichromate ([0047-01](#), [0047-02](#)), and Pentazinc chromate octahydroxide ([0118-01](#), [0118-02](#)). These have not yet been decided by the European Commission.

Substance Name	CAS NO	EC No	Use	Authorisation Holder & Links
			process - etch rate, intergranular attack/end grain pitting, surface contamination, fatigue testing, tensile testing, surface roughness, impact to shot peen compressive layer; and for the chemical conversion coating and sealing after anodising process - corrosion resistance, active corrosion inhibition, adhesion promotion, chemical resistance, layer thickness, electrical properties <sup>4</sup>	
Potassium dichromate	7778-50-9	231-906-6	<b>Sealing after anodizing applications</b> by the aerospace sector <sup>2</sup> , where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use <sup>6</sup>	Wesco (Application ID <a href="#">0098-01</a> )  <a href="#">Draft EC Decision</a>
Sodium dichromate	10588-01-9 7789-12-0	234-190-3	<b>Sealing after anodizing applications</b> by the aerospace sector <sup>2</sup> , where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use <sup>7</sup>	Wesco (Application ID <a href="#">0097-01</a> )  <a href="#">Draft EC Decision</a>

Although the exact timing is not yet known, these authorisations are expected to enter into force ('date of adoption') in the EU (and wider EEA) in October 2019, which will start the clock ticking on a number of actions that will need to be taken by downstream users. We will inform you of the date of adoption once it is known.

If your company or your supply chain uses substances or formulations covered by these authorisations to manufacture or repairs aerospace and defence components in the EEA, you can (continue to) procure them from the relevant Authorisation holders, Wesco Aircraft ([www.wescoair.com](http://www.wescoair.com)) or Aviall ([www.aviall.com](http://www.aviall.com)), according to the table above. Once these Authorisations enter into force, relevant products supplied by Wesco and Aviall will be labelled to indicate the appropriate Authorisation Number. Wesco and Aviall will also supply an updated SDS containing the relevant exposure scenarios within the required timeframe.

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<sup>4</sup> The authorisation for the use of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by the aerospace sector is not granted for this use where none of the key functionalities listed in the use is necessary.

<sup>6</sup> The authorisation for the use of potassium dichromate is not granted for sealing after anodizing applications by the aerospace sector where none of the key functionalities listed are necessary for the intended use.

<sup>7</sup> The authorisation for the use of sodium dichromate is not granted for sealing after anodizing applications by the aerospace sector where none of the key functionalities listed are necessary for the intended use.

## REACH Requirements for Companies Using Chromium Under these Authorisations

In order to use hexavalent chromium-containing substances or formulations that carry an Authorisation Number in the EEA, your company must comply with relevant obligations and adhere to relevant conditions specific to each Authorisation.

In case you use substances or formulations covered by these authorisations, you will have additional obligations under these REACH authorisations. For example:

- You must comply with relevant risk management measures (RMMs) and operational conditions (OCs) described in the Chemical Safety Report and the specific conditions set out in the EC Decision (see Table 1 for application number links and draft EC Decision links, respectively). It should be further noted that, as a condition of the authorisation, the authorisation holder(s) must develop specific exposure scenarios for representative processes, operations and individual tasks within 3 months of the date of adoption. Once these exposure scenarios are made available in an updated SDS, you will be subject to the RMMs and OCs described in the specific exposure scenarios.
- **Within 3 months of the first delivery** of substances or formulations following authorisation (as identified by the authorisation number provided on the label), you must make a notification to ECHA. Guidance on this process is available at the ECHA website [<https://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorized-use>]. Make sure you have a valid REACH-IT account [you can find out more at <https://reach-it.echa.europa.eu/reach/>] to make this notification when needed.
- **After 3 months and within 6 months of the date of adoption**, you must have measured for the first time after authorisation the amount of hexavalent chromium to which your workers may be exposed by inhalation (without regard to respiratory protection), and the estimated amount that may be released to the environment during relevant processes<sup>8</sup>. The measurement data must be made available to ECHA within 12 months from the date of adoption.

Wesco and Aviall will provide additional information when they supply these products to help you comply with the various obligations under relevant authorisations.

### Future Developments

Please start to prepare your own organisation and forward this communication and any future communications to your customers and suppliers that might be impacted by these authorisations. You can track decisions by the European Commission relating to these applications for authorisation at the ECHA website ([Adopted opinions and previous consultations on applications for authorisation](#)) or through Wesco Aircraft or Aviall.

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<sup>8</sup> Additional guidance and sampling templates will be provided by Wesco / Aviall to use for worker monitoring and air & water testing.

We expect to provide further communications in due course to keep you informed about the process and resources that may assist you to understand and address your obligations. Information is also available on the GCCA Website (<https://ramboll.com/media/gcca>). If there is sufficient interest from suppliers, we may organise a webinar to support feedback.

Should you wish to be kept informed and/or should you have immediate questions, please contact:

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