

Subject: **An essential guide to compliance with REACH Authorisation obligations for GCCA Downstream Users**

GCCA News Bulletin No. 2019-02

Issued By: GCCA¹

Date: 10 September 2019

Overview

When you receive substances or formulations that are labelled with one or more Authorisation Numbers in the EEA, your company must comply with relevant obligations and adhere to relevant conditions set out in the respective Authorisation.

You must carefully check the labels of all products you purchase for a REACH Authorisation number.

When a product does carry an Authorisation number, you must take appropriate steps to ensure compliance. Each Authorisation has specific conditions. You may use products with different Authorisation numbers and/or products for which an Authorisation number is awaited². You can track the status of these other AfAs and decisions by the European Commission relating to these AfAs at the ECHA website ([Adopted opinions and previous consultations on applications for authorisation](#)).

You must identify all the Authorisations that apply to you and ensure you have a detailed understanding of the requirements for each of these Authorisations.

This communication relates to specific Authorisations developed by GCCA (as described in the GCCA News Bulletin No. 2019-01 issued on 12 August 2019, available at this [link](#), and provided as Annex 1 to this Bulletin). These Authorisations are expected to come into force as EU Regulations in October 2019³, and we will send a further Bulletin with an appropriate update at that time.

Once these GCCA Authorisations come into force, the GCCA Authorisation holders [Boeing Distribution, Inc. (formerly Aviall Services Inc.) and Wesco Aircraft] will label all affected products with the relevant Authorisation number. When you receive a product bearing one of these Authorisation Numbers on the label, you (the 'Downstream User') must comply with relevant obligations within specified timeframes.

The aim of this communication is to inform Downstream Users of the requirements under these Authorisations and the schedule for compliance. We want to invite questions and support planning to respond to these obligations in an appropriate and timely manner⁴.

The requirements that you need to be aware of are listed below. To facilitate your planning, they are listed here according to the necessary timeframe for implementation. We strongly encourage you

¹ Global Chromates Consortium for Aerospace

² Several applications for authorisation (AfAs) relate to aerospace and defence activities. Authorisations have been granted for some of these AfA, while decisions are awaited for others.

³ Based on available information. The exact date is not known.

⁴ This document does not provide legal advice. Each Downstream User must take appropriate measures to satisfy itself regarding compliance.

to refer to all relevant documentation relating to these Authorisations, as indicated at the end of this bulletin.

Immediate requirements

- Make sure you comply with the relevant Risk Management Measures (RMMs) and Operational Conditions (OCs) in the relevant Chemical Safety Report (CSR) (e.g. duration of task, local exhaust ventilation and respirator requirements, etc.) (See Annex 1 for links to relevant CSRs).
- Make sure you comply with specific conditions applicable for each Authorisation. These requirements are generally consistent with the existing requirements under EU Directive 2004/37/EC but need to be checked individually. They are likely to include (but may not be limited to):
 - Implementing best practices to reduce workplace exposure to the substance and its emissions to the environment to as low a level as technically and practically feasible, including using closed systems and automation, when possible.
 - Where closed systems and automation is not possible, using appropriately designed and installed Local Exhaust Ventilation (LEV) systems.
 - For decanting and weighing of solid chromates - using closed systems and automation, where possible⁵.
 - Restricting access to the areas where solid chromates are used either physically by means of barriers or through strict procedure during the activity and for a specified time after the operation.
 - Using mechanical ventilation for machining activities in small work areas, except in cases where it introduces risks or would not be technically and practically possible⁵.
 - Implementing effective cleaning practices to prevent surface contamination around treatment baths and other equipment, where machining activities take place, and where solid chromates are handled.
 - Checking and testing LEV and RPE periodically [including fit testing of Respiratory Protective Equipment (RPE)] and providing records upon request of applicable Member State Competent Authorities.
 - Conducting waste management activities under appropriately designed and installed LEV when technically and practically possible⁵.

~ January 2020 – 3 Months Post-Adoption

- Comply with the following specific conditions set out in the EC Decision, including but not limited to:
 - Fully applying any additional or revised RMMs and OCs described in the specific exposure scenarios developed by the Applicant(s) and provided by your supplier(s)⁶.

⁵ Where not possible, GCCA recommends to clearly document justification in case of inspection by enforcement authorities.

⁶ 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.

3 Months from first delivery of the authorised substance

- Making a notification to ECHA within 3 months of the first time the substances (as such or in a mixture) was delivered to you and including in the notification an explanation of the key functionalities which are required for your use. Suppliers building to customer designs/requirements (i.e. build to print) are advised to confirm the applicable key functionalities with their (design responsible) customers prior to reporting to ECHA.

~ April 2020 – 6 Months Post-Adoption

- Implementing air monitoring programmes on occupational exposure to chromium (VI) that are based on relevant standard methodologies and are representative of the range of tasks undertaken⁷.
- Monitoring chromium (VI) emissions to wastewater and air from LEV. Monitoring programs must be based on relevant standard methodologies and be representative of the operational conditions and risk management measures (such as waste water treatment systems, gaseous emission abatement techniques) used at the individual sites where measurements are carried out⁷.
- Using the information gathered and related contextual information to regularly review the effectiveness of the risk management and operational conditions and introducing measures to further reduce exposure and emissions. Results must be documented and made available to applicable Member State Competent Authorities upon request.

~ October 2020 – 12 Months Post-Adoption

- Submitting to ECHA the information collected (e.g. each set of measurements), including the contextual information associated to each set of measurements for transmission to the authorisation holder.

⁷ Additional guidance and sampling templates will be provided by Wesco Aircraft / Boeing Distribution, Inc. (formerly Aviall Services Inc.) to use for worker monitoring and air & water testing.

What Happens Next?

Downstream users are advised to immediately start preparing for compliance. GCCA members recognise the challenges facing our suppliers and customers in terms of understanding and complying with their obligations under GCCA Authorizations are significant, and are putting in place several activities:

- We are arranging webinars to explain the next steps and to allow directly affected suppliers and customers to ask questions on **Tuesday 17 September and Thursday 3 October 2019 at 9:00 a.m. EDT/2:00 p.m. BST/3:00 p.m. CET**. If you are interested in attending, please contact Dianne Green at dgreen@ramboll.com.
- Further Bulletins will be provided with guidance on key issues.

We want to hear your questions and concerns, so we can help address them. In case you have questions and/or concerns or need further support to understand your obligations, please advise Dianne Green (details below) accordingly. Also, please forward this communication and any future communications to your customers and suppliers that might be impacted by these authorisations.

Future Developments

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 Boeing Distribution, Inc. (formerly Aviall Services Inc.).

Information is also available on the GCCA Website (<https://ramboll.com/media/gcca>).

Please use the contact information below to contact GCCA if you have any questions or if there are certain topics you would like GCCA to address, either in its news bulletins or future webinars. Your feedback is highly appreciated.

Sue Bullock

GCCA Technical Director

T +44 (113) 2005502

sbullock@ramboll.com

Dianne Green

GCCA Consortium Manager

T +1 (513) 563 3542

dgreen@ramboll.com

Alan Thompson

GCCA Chair

T +1 (206) 769 3081

alan.thompson@boeing.com

Erin Yaeger

GCCA Deputy Chair

T +1 (860) 557 1017

erin.yaeger@pw.utc.com

David A. Pinsky

GCCA Deputy Chair

T +1 (978) 858 9820

David_A_Pinsky@raytheon.com

Annex 1 - Specific uses covered by approved GCCA REACH authorisations

Chromium trioxide⁸ (CAS No 1333-82-0/EC No 215-607-8)

- Use: **Chemical conversion and slurry coating applications** by the aerospace sector⁹, 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)¹⁰
- Authorisation Holder: Wesco Aircraft
- Related Links:
 - o Application ID [0096-01](#)
 - o [CSR](#)
 - o [Draft EC Decision](#)

Sodium chromate (CAS No 7775-11-3/EC No 231-889-5)

- Uses:
 - 1. Formulation of mixtures** for sealing after anodizing, chemical conversion coating, pickling and etching applications by the aerospace sector.
 - 2. Sealing after anodizing, chemical conversion coating, pickling and etching applications** by the aerospace sector, where any of the following key functionalities or properties is necessary for the intended use: for the pickling/etching 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 properties¹¹
- Authorisation holder: Boeing Distribution, Inc. (formerly Aviall Services Inc¹²) and Wesco Aircraft
- Related Links:
 - o Application ID [0099-01](#) and [0099-02](#)
 - o [CSR](#)
 - o [Draft EC Decision](#)

⁸ This authorisation covers only liquid formulations

⁹ 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.

¹⁰ 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.

¹¹ 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.

¹² Boeing Distribution, Inc. (formerly Aviall Services Inc.) 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.

Potassium dichromate (CAS Nos 7775-11-3/EC No 231-906-6)

- Use: **Sealing after anodizing applications** by the aerospace sector, where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use¹³
- Authorisation holder: Wesco Aircraft
- Related Links:
 - o Application ID [0098-01](#)
 - o [CSR](#)
 - o [Draft EC Decision](#)

Sodium dichromate (CAS No 10588-01-9, 7789-12-0/EC No 234-190-3)

- Use: **Sealing after anodizing applications** by the aerospace sector, where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use¹⁴
- Authorisation holder: Wesco Aircraft
- Related Links:
 - o Application ID [0097-01](#)
 - o [CSR](#)
 - o [Draft EC Decision](#)

¹³ 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.

¹⁴ 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.