

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

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Overview

The GCCA-sponsored authorisations for **chromium trioxide** and **sodium chromate** entered into force ('date of adoption') in the EU (and wider EEA) on **29 October 2019** and **potassium dichromate** entered into force on **5 November 2019**. The entry into force of the **sodium dichromate** authorisation is expected to follow shortly.

Further, during the 19-20 November REACH Committee Meeting, the GCCA-sponsored authorisations for **dichromium (tris)chromate** and **strontium chromate** were voted on and approved by the European Commission's REACH Committee. These are expected to enter into force in 1Q2020. GCCA will communicate when this occurs.

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 trioxide¹	1333-82-0 / 215-607-8	Chemical conversion and slurry coating applications by the aerospace sector ² , 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) ³	Wesco (Application ID 0096-01) Commission Implementing Decision Official Journal Entry
Sodium chromate	7775-11-3 / 231-889-5	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	Boeing Distribution, Inc. (formerly Aviall) and Wesco (Application ID 0099-01 and 0099-02)

¹ This authorisation covers only liquid formulations

² 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.

³ 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.

Substance Name	CAS No / EC No	Use	Authorisation Holder & Links
		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 properties ⁴	Commission Implementing Decision Official Journal Entry
Potassium dichromate	7778-50-9 / 231-906-6	Sealing after anodizing applications by the aerospace sector ² , where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use ⁵	Wesco (Application ID 0098-01) Commission Implementing Decision Official Journal Entry
Sodium dichromate	10588-01-9 and 7789-12-0 / 234-190-3	Sealing after anodizing applications by the aerospace sector ² , where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use ⁶	Wesco (Application ID 0097-01) Draft EC Decision
Dichromium (tris) chromate	24613-89-6 / 246-356-2	Chemical conversion coating applications by aerospace and defence sector where any of the following key functionalities or properties is necessary for the intended use: corrosion resistance, active corrosion inhibition, adhesion promotion, chemical resistance, layer thickness, electrical properties ⁷	Wesco (Application ID 0116-01) Draft EC Decision
Strontium chromate	7789-06-2 / 232-142-6	Use in primers applied by aerospace and defence sector where any of the following key functionalities or properties is necessary for the intended use: corrosion resistance, active corrosion inhibition, adhesion promotion, thermal shock resistance and chemical resistance ⁸	Wesco; PPG; and Cytec (Application ID 0117-01) Draft EC Decision

⁴ 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.

⁵ 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.

⁶ 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.

⁷ The authorisation for the use of dichromium (tris)chromate is not granted for chemical conversion coating applications by the aerospace and defence sector where none of the key functionalities listed are necessary for the intended use.

⁸ The authorisation for the use of strontium chromate is not granted for primer applications by the aerospace and defence sector where none of the key functionalities listed are necessary for the intended use.

For the Authorisations that have entered into force, relevant products supplied by the applicants, Wesco and Boeing Distribution, Inc.⁹ (formerly Aviall), will be labelled to indicate the appropriate Authorisation Number and an updated SDS containing the relevant exposure scenarios will be supplied within the required 3-month timeframe.

Future Developments

Please 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 Boeing Distribution, Inc. (formerly Aviall).

Please refer to previous communications from GCCA for overview on the legal requirements for downstream users of authorised substances ([GCCA News Bulletin No. 2019-01](#) and [No. 2019-02](#)). 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>). Should you wish to be kept informed and/or should you have immediate questions, please contact:

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

⁹ Boeing Distribution, 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 hydroxyoctaoxodizincatedichromate ([0047-01](#), [0047-02](#)), and Pentazinc chromate octahydroxide ([0118-01](#), [0118-02](#)).