

Subject: **Time-Sensitive REACH Authorisation requirements for certain Aerospace and Defence Hexavalent Chromium Compounds**

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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** (see Table 1 for additional details).

Table 1. Specific uses covered by adopted GCCA REACH authorisations

Substance Name	Authorisation Number	Authorised Use	Authorisation Holder & Links
Chromium trioxide ¹ CAS 1333-82-0 / EC 215-607-8	REACH/19/29/0	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 CAS 7775-11-3 / EC 231-889-5	REACH/19/32/0 REACH/19/32/1 REACH/19/32/2 REACH/19/32/3	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 properties ⁴	Boeing Distribution, Inc. (formerly Aviall) and Wesco (Application ID 0099-01 and 0099-02) Commission Implementing Decision Official Journal Entry

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 are necessary for the intended use.

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.

Substance Name	Authorisation Number	Authorised Use	Authorisation Holder & Links
Potassium dichromate CAS 7778-50-9 / EC 231-906-6	REACH/19/31/0	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

When these authorisations entered into force, various time-sensitive requirements related to these authorisations came into effect for Downstream Users (DSU), including those highlighted in Table 2.

Table 2. Relevant deadlines specified in the GCCA Authorisations

Substance	Comply with updated e-SDS	Submit Article 66 notification to ECHA	Submit Key Functionalities to ECHA ⁶	Implement worker air monitoring programmes	Send ECHA worker and environmental monitoring data
Chromium trioxide	24 January 2020	Within 3 months of first delivery ⁷	Within 3 months of first delivery	24 April 2020	24 October 2020
Sodium chromate Use 1	24 January 2020	Within 3 months of first delivery	Within 3 months of first delivery	24 April 2020	24 October 2020
Sodium chromate Use 2	24 January 2020	Within 3 months of first delivery	Within 3 months of first delivery	24 April 2020	24 October 2020
Potassium dichromate	29 January 2020	Within 3 months of first delivery	Within 3 months of first delivery	29 April 2020	29 October 2020

If you use substances or formulations covered by these authorisations, there are certain obligations, including:

- You must comply with exposure scenarios provided in updated extended SDS (e-SDS) by your chemical suppliers. If you have not already received e-SDS, you should expect to receive them shortly.
- 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. As a specific condition of the GCCA Authorisations, you must include in your notification the key functionalities that apply to your use. A table of key functionalities relating to the GCCA Authorisations is available in the [GCCA Authorisation Toolbox](#)⁸ on the [GCCA Website](#)⁹.
- Within 6 months of the date of adoption, you must measure for the first time after authorisation the amount of hexavalent chromium to which your workers may be exposed by inhalation. Additional guidance and templates are available in the [GCCA Authorisation Toolbox](#).

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 Key Functionalities are to be submitted as a part of the Article 66 notification, as per the specific condition specified in the Implementing Decisions.

⁷ Per Article 66 of the REACH Regulation, DSU notifications are to be submitted to ECHA within 3 months of first delivery of substances or formulations following authorisation (as identified by the authorisation number provided on the label).

⁸ <https://ramboll.com/services-and-sectors/environment-and-health/product-safety-and-stewardship/gcca/authorisation-toolbox>

⁹ <https://ramboll.com/services-and-sectors/environment-and-health/product-safety-and-stewardship/gcca>

- Within 12 months of the date of adoption, you must measure for the amount of hexavalent chromium that may be released to the environment (via air and water emissions) during relevant processes. Additional guidance and templates are available in the [GCCA Authorisation Toolbox](#).
- Within 12 months of the date of adoption, you must send ECHA your worker and environmental monitoring data, along with any contextual information. Worker and Environmental Monitoring Templates are available in the [GCCA Authorisation Toolbox](#).

GCCA Authorisation Toolbox and Training Modules

GCCA is developing an [Authorisation Toolbox](#) to help Downstream Users understand relevant requirements under the GCCA Authorisations and to provide tools to assist Downstream Users in managing these obligations.

The Authorisation Toolbox contains the following guidance and tools:

- GCCA Guidance on Worker and Environmental Monitoring. Appendix 2 of this guidance also includes guidance on how to select Operational Conditions (OC) and Risk Management Measures (RMM).
- GCCA Template to Report Occupational Exposure Measurements. Related GCCA examples are under development and will be available shortly.
- GCCA Template to Report Environmental Emission Measurements. Related GCCA examples are under development and will be available shortly.
- Frequently Asked Questions based on feedback received to date from GCCA members and other Downstream Users. This section will be continually updated to address common questions GCCA receives.
- ECHA Notification Guidance and information on Key Functionalities
- How-to Webinar Modules. These are under development and announcements will be sent when they are available.
- Exposure Scenarios

Please forward this communication and any future communications to your customers and suppliers that might be impacted by these authorisations. We will provide further communications in due course to continue to keep you informed about the process and resources that may assist you to understand and address your obligations. Updated information will also continue to be posted 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:

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