

PRESS RELEASE

**GCCA Consortium**

RAC and SEAC Draft Opinions on applied for REACH authorisations of certain uses of Chromium trioxide, Sodium chromate, Potassium dichromate and Sodium dichromate in the aerospace industries

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Global Chromates Consortium for Aerospace (GCCA) was formed in 2015 to prepare and submit applications for Authorisation under the European REACH Regulation for hexavalent chromium substances that are critical to the aerospace, defence and aeroderivative sectors.

GCCA, assisted by its consultant Ramboll Environ, has prepared and submitted (prior to the applicable regulatory Latest Application Date<sup>1</sup>) Applications for Authorisation (AfA) for the following substances, all of which have a **Sunset Date<sup>2</sup> of 21 September 2017**:

Substance Name	CAS No / EC No	Use(s) Applied For	GCCA Applicant(s)	Consultation No
Chromium trioxide	1333-82-0 / 215-607-8	1. Use of chromium trioxide for chemical conversion and slurry coating applications by aerospace companies and their suppliers	Wesco Aircraft EMEA Limited	0096-01
Sodium chromate	7775-11-3 / 231-889-5	1. Formulation of Mixtures of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by aerospace companies and their suppliers 2. Use of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by aerospace companies and their suppliers	Aviall Services Inc. And Wesco Aircraft EMEA Limited	0099-01  0099-02
Potassium dichromate	7778-50-9 / 231-906-6	1. Use of potassium dichromate for sealing after anodizing applications by aerospace companies and their suppliers	Wesco Aircraft EMEA Limited	0098-01
Sodium dichromate	10588-01-9 / 7789-12-0 / 234-190-3	1. Use of sodium dichromate for sealing after anodizing applications by aerospace companies and their suppliers	Wesco Aircraft EMEA Limited	0097-01

The European Chemical Agency's (ECHA) Risk Assessment Committee (RAC) and Socio Economic Assessment Committee (SEAC) have issued their *confidential Draft Opinions* to

<sup>1</sup> According to REACH Article 58(1), ECHA is required to specify the transitional arrangements for each substance recommended for inclusion in Annex XIV. In particular, this consists of a date, or dates, at least 18 months before the sunset date(s), by which applications must be received if the applicant wishes to continue to use the substance or place it on the market for certain uses after the sunset date(s). That date is referred to as Latest Application Date (LAD).

<sup>2</sup> Annex XIV (i.e., the Authorisation List) specifies for each listed substance the "Sunset Date" from which the substance cannot be placed on the market for a use or used after this date, unless an Authorization is granted for that use or an Application for Authorisation has been submitted for that use before the Latest Application Date and the decision is pending.

the GCCA Applicants in July 2017; however, the ECHA review timeline provided indicates **no final decision on the GCCA AfAs will be made by the European Commission prior to the Sunset Date of 21 September 2017** for the above substances/use(s)/applicant(s).

Pursuant to Article 58(1)(c)(ii) of the REACH Regulation, Downstream Users that are relying on the GCCA AfAs listed above may continue to use the referenced substances for the specific uses identified in the AfAs beyond the 21 September 2017 Sunset Date, at least until the European Commission has decided on the Authorisations<sup>3</sup>. However, Downstream Users will only be covered by the pending GCCA AfAs beyond this date if ALL of the following conditions are met:

- i. The substance (on its own or in a mixture<sup>4</sup>) is supplied by an applicant, or via a supply chain that purchased the substance from an applicant, for the GCCA Authorisation as listed above ;
- ii. Their use of the substance is consistent with the specific pending AfA; and
- iii. Downstream Users apply the worker and environmental protection requirements set out in the latest version of the relevant Safety Data Sheets (SDS(s)).

Further, consistent with National and European Union chemical control, worker safety and environmental regulations, employers are required to replace the abovementioned substances where technically feasible. Where replacement is not feasible, employers must implement all appropriate and specified protective measures in accordance with applicable regulations (e.g., use closed systems, emission controls and otherwise adopt measures to best protect workers and the environment, such as containment, exhaust ventilation, personal protective equipment, etc.), as required.

Upon adoption of the RAC and SEAC Final Opinions and subsequent publication of European Commission Decisions, it is expected that specific conditions for use beyond those described in the applications, as well as human and environmental exposure monitoring requirements, will also become obligatory. Downstream Users are advised to closely monitor for any potential updates of applicable SDSs, container labelling information or communications from their suppliers related to substance Authorisations.

Finally, the RAC and SEAC Final Opinions and decisions by the European Commission relating to these AfAs, as well as other Authorisation substances, can be found on the ECHA Website – [Adopted opinions and previous consultations on applications for authorisation](#). In addition, Downstream Users may also wish to refer to the following guidance posted on the ECHA website – [Sunset date for Chromium VI compounds approaches – what should downstream users do?](#)

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<sup>3</sup> Downstream users can also refer to the [ECHA Q&A 1358](#) for additional guidance.

<sup>4</sup> When a substance is used in a mixture, the exemptions in Article 56(6)(a) and (b) of REACH apply to SVHCs meeting the criteria of points (d), (e), and (f) of Article 57 of REACH below a concentration limit of 0.1% w/w, and for all other substances below the values specified in Article 11(3) of Regulation (EC) No 1272/2008 which result in the classification of the mixture as hazardous (See ECHA Question ID 0130, modified 25/01/2016).