COMMUNICATION TO THE AEROSPACE SUPPLY CHAIN
(2nd ADDENDUM):
UPDATE ON REACH AUTHORISATION FOR CHROMATES

12 June 2020
This paper is the second addendum to the ASD communication of 15th February 2016 (‘COMMUNICATION TO THE AEROSPACE SUPPLY CHAIN: UPDATE ON REACH AUTHORISATION FOR CHROMATES’) and aims to share the status on the CTAC, CCST and GCCA Applications for Authorisation.

Background

According to the REACH regulation\(^1\), the use of some chromates\(^2\) is banned in Europe from September 2017 and/or January 2019, depending on the substances, unless a specific Authorisation has been granted for a specific use and a specific chemical supply-chain, for a limited time period, and for the specific cases where no suitable alternatives can be implemented before the Sunset Dates.

Applications for Authorisation have been submitted by chemical suppliers, as applicants, with the support of some industrial consortia for some Aerospace uses of some chromates.

Any downstream user will be covered by the granted Authorisations if the three following conditions are met:

- The use of the substance by this company falls under the authorised use definition;
- The company is supplied by a chemical supplier covered by the Authorisation;
- The company complies with the operational conditions and risk management measures set out in the Applications for Authorisation (chemical safety report) and the Authorisation Decisions, and with the conditions of the Authorisation Decisions.

CCST and GCCA Applications for Authorisation status

The European Commission’s decisions on the CCST and GCCA Authorisations (except for GCCA Sodium Dichromate and Strontium Chromate currently in the last steps of adoption) have been adopted (7 years review period from the Sunset Dates) and their summary has been published in the EU Official Journal.

- Downstream users must comply with Exposure Scenarios provided in updated extended SDS (e-SDS) by their chemical suppliers. The e-SDS must be provided by the chemical suppliers within 3 months from the Authorisation decisions.
- Downstream users must submit a Notification of their authorised use (Article 66 of REACH\(^3\)) to ECHA within 3 months from the first delivery of the substance following publication of the Authorisation decisions.
- Downstream users must include in their REACH Art 66 Notification an explanation of the Key Functionalities which are required for their use, including a justification why such Key Functionalities are necessary for that use.
  - An Excel Sheet is made available to downstream users under [www.jonesdayreach.com](http://www.jonesdayreach.com) (CCST Applications) and [https://ramboll.com/media/gcca](https://ramboll.com/media/gcca) (GCCA Applications)
- Downstream users must submit to ECHA exposure and environmental data 12 months after Authorisation after having conducted monitoring within 6 months of Authorisation.

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\(^2\) Please refer to REACH Annex XIV for the comprehensive list of substances and their respective Sunset Dates and Latest Application Dates.

\(^3\) ASD REACH Art 66 Q&A of February 2019
The dates for collecting and reporting such information are included in the Authorisation decisions and summarized in the press releases from the CCST and GCCA consortia, annexed to this addendum.

**CTAC Applications for Authorisation status**

The European Commission’s decision has not been adopted yet.

Downstream users can continue using chromium trioxide after its sunset date (September 2017), awaiting for the European Commission’s decisions. As long as the European Commission’s decisions covering their use are pending, downstream users cannot notify their use to ECHA.

**ANNEXES**

Press releases of CCST and GCCA

**Disclaimer**

This communication should not be considered as providing advice on REACH or its interpretation. The reader should refer to the official websites of the European Chemicals Agency and the European Commission for information on and the requirements of REACH discussed in this document, for example: