

## Do any of your processes rely on the use of chromates? Do any of your formulations contain chromates?

### Aerospace and Defence supply chains are impacted

You may use potassium dichromate, sodium dichromate, or chromium trioxide in conversion coating or in the passivation of stainless steel. Or perhaps you use paint or adhesive bonding primers based on strontium chromate. In the EU, the use of eight chromate substances<sup>1</sup> in applications such as these within the aerospace and defence sector are all subject to Authorisation under the REACH Regulation<sup>2</sup>. Authorisation under REACH applies to “substances of very high concern” (SVHCs) and aims to ensure that less hazardous substances or technologies progressively replace substances with certain types of hazardous properties.

In order to continue using such substances, companies must apply for “Authorisation”. Manufacturers of the substances, importers, or downstream users (under certain conditions) can submit applications. Applications for Authorisation are always made for specific uses and granted for a limited time period (the “review” period), and holders can apply for renewal for a further period of time.

The eight chromate substances meet the REACH SVHC criteria as all are classified as being carcinogens and mutagens, and may also be toxic for reproduction. These eight chromate substances have gone through the REACH Authorisation process once. Decisions are pending on the Authorisation for their continued use. Although it is anticipated that all uses applied for will be granted Authorisation, in some cases the granted time period will be short (4 years), making it necessary for the next round of applications to start in the immediate future. In other cases, the conditions currently proposed as part of granting the Authorisations may be highly restrictive for some users, resulting in some current standard industry practices falling outside the scope of the granted Authorisation. These users will not be covered by an Authorisation.

### What does this mean for users of these chromates?

This means you need to act. Currently, all uses applied for in the initial applications may continue. For those uses with a 4 year review period, the lack of a longer Authorisation period threatens business continuity within aerospace and defence supply chains and for the entire industry.

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<sup>1</sup> Chromium trioxide, sodium chromate, sodium dichromate, dichromium tris(chromate), potassium chromate, strontium chromate, pentazinc chromate octahydroxide, potassium hydroxyocta oxodizincate dichromate

<sup>2</sup> Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Although the first round of applications for Authorisation were made by the suppliers of the chromate substances or chromate formulations, experts from the aerospace and defence industry were involved. A key lesson from the first set of applications is that the only way to ensure that the uses of concern to every aerospace and defence supply chain are fully covered is for a much wider participation by the members of that supply chain. The biggest business risk facing supply chains is assuming that someone else will take care of their REACH Authorisation needs.

Seven of the aerospace and defence companies that were involved in the first Authorisation applications have joined together to act as the initiators of a wider Aerospace and Defence Chromates Reauthorisation Consortium (ADCR). These companies have joined together to build on the knowledge and expertise that they gained from the first applications. This joint approach also enables cost efficiencies to be realised where supply chains involve multiple users undertaking the same activities with one of the chromates.

Risk & Policy Analysts Ltd, together with Fieldfisher, Bureau Veritas and FoBiG have been contracted by the ADCR to support the creation of the consortium and to help develop a strategy for future aerospace and defence Applications for Authorisation of the continued use of the eight chromates (see footnote 1 for a full list).

The ADCR is currently in a pre-consortium phase with an inaugural meeting to be held in Brussels on 20<sup>th</sup> September 2019. The consortium is now open to other members from within the aerospace and defence supply chains. This includes all companies from those that use the chromates to those whose operations rely on their use within the supply chain. It is therefore open to formulators, “build to spec” and “build to print” suppliers, original equipment manufacturers, aviation repair and maintenance operators, airlines, and any other impacted company. The ADCR will soon be advertising its forthcoming Authorisation activities so you may become aware of ADCR’s work from multiple sources; do not assume, however, that all relevant stakeholders will become aware of this reauthorisation work in time. It is imperative that you get involved and communicate this information along your supply chain to ensure that the needs of all relevant stakeholders are addressed in the ADCR’s Authorisation work.

You need business certainty regarding your ongoing use/s of these chromates. Unless you are involved in the ADCR and encourage your supply chain to be involved, you cannot be sure that your uses will be covered. To find out more about the consortium and how to join, please contact: <https://www.adcr-consortium.eu/>