

To whom it may concern

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Object: ASD Communication to Supply Chain on Authorisation for Chromates due to REACH (REGULATION (EC) No 1907/2006)

Dear Madam/Sir,

Please find attached an information note of February 2016 from the Aerospace and Defence Industries Association of Europe (ASD) on REACH Authorisation for certain Chromates (also available on the ASD website: <http://www.asd-europe.org> under Commissions / Environment) in 4 languages, where Airbus Defence and Space contributed to.

According to the REACH regulation, the use of some chromates will be banned in Europe (EEA) from September 2017 unless a specific Authorisation has been granted by the European Commission (please refer to REACH Annex XIV).

Please note that any Authorisation will be time-limited and will only cover some chromates, some chemical suppliers and some uses.

The ASD note lists some of the Applications for Authorisation which have been submitted to date to the European Chemicals Agency (ECHA), namely CTAC (chromium trioxide) and CCST (other chromates) - see details enclosed.

Any company (for example -but not limited to- subcontractors) will only be covered by the Authorisation for a specific use if the three following conditions (amongst other requirements of Authorisation) are met:

1. The use of the relevant chromate by this company falls under the authorised use definition;

- ⇒ The CTAC and CCST Applications for Authorisation include some uses of chromates specified by Airbus Defence and Space for their own applications e.g. among others **CTAC Use No. 4** "Surface treatment for applications in the aeronautics and aerospace industries (unrelated to Functional chrome plating or Functional chrome plating with decorative character)" or **CCST use (iii)** "Application of paints, primers, and speciality coatings containing Strontium chromate in the construction of aerospace and aeronautical parts, including aeroplanes / helicopters, space craft, satellites, launchers, engines, and for the maintenance of such constructions, as well as for such aerospace and aeronautical parts, used elsewhere, where the supply chain and exposure scenarios are identical".

2. The company is supplied by a chemical supplier covered by the Authorisation;

- The attached ASD note encloses a list of companies that are included in the Applications for Authorisation for uses applied for in the CTAC and CCST Applications for Authorisation.
N.B.: Each member of the supply chain should, in any event, check with its suppliers whether authorisation is being sought for substance(s) and for which use(s) also to ensure that it/the relevant legal entities will be covered as needed.

3. The company complies with the specific conditions (e.g. - but not limited to- environmental, health and safety) which will be associated to the Authorisation.

- Please refer to the workplace safety and environmental requirements described in the Chemical Safety Reports which are included in the Applications for Authorisation.

Particular attention should be paid to the fact that the Authorisation conditions may be more stringent than current requirements.

Please note that decisions from the European Commission for CTAC and CCST Applications for Authorisation are expected not earlier than end 2016.

Note also that, under the REACH Authorisation regime, Downstream Users (as defined in REACH) which are continuing using the relevant chromates must make a **notification of this use to ECHA** within three months of the first supply of the substance {REACH Art. 66(1)}. Such notifications will be kept in a register maintained by ECHA and will be made available by ECHA to the national Authorities {REACH Art. 66(2)}.

Please note that other Applications for Authorisation may be in preparation to cover other chromates and/or other chemical supplier and/or other uses. Each member of the supply chain (including -but not limited to- subcontractors) should check with its suppliers whether all uses of chromates listed in Annex XIV will be covered by an Authorisation after the relevant sunset date.

If you have any question, please contact REACH.AirbusDS@airbus.com.

Yours faithfully

i.V.



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This [e-mail] should not be considered as providing advice on REACH or its interpretation. The reader should refer to the official websites of, e.g., ECHA (the European Chemicals Agency) for information on and the provisions of REACH discussed in this [e-mail], for example:

<http://echa.europa.eu/regulations/reach>

<http://echa.europa.eu/web/guest/regulations/reach/authorisation/applications-for-authorisation>