



REACH Authorisation and Hexavalent Chrome

REACH, (Registration, Evaluation, Authorisation and Restriction of Chemicals) is a European Union regulation (EC No 1907/2006). Substances are included in the [Authorisation List \(Annex XIV\)](#) of REACH, where their use in the European Economic Area (EEA), whether on their own or in mixtures or articles, are prohibited after the relevant sunset date unless an Authorisation is held by the user or an upstream supplier.

The situation in Great Britain (GB) is the same. As a result of Brexit, Great Britain is now subject to UK REACH (UK Statutory Instruments 2019 No. 758, 857 & 1144, and 2020 No. 1577) and the provisions related to the hexavalent chromium Authorisations are the same as for the EEA. These Authorisations are all recognized under UK REACH such that downstream users in GB may continue to benefit from them in the same way as users in the EEA. As a result of the Northern Ireland (NI) Protocol, in Northern Ireland, EU REACH still applies.

Hexavalent chromium compounds (chromates) listed in Annex XIV (of EU and UK REACH) along with their sunset dates, relevant consortia or company supporting Upstream Authorisation applicants are shown in the following tables.

Substance Name	EC No.	CAS No.	Sunset Date	Consortium/ company sponsoring A&D Upstream Authorisations
Chromium trioxide	215-607-8	1333-82-0	21 September 2017	CTAC, GCCA
Chromic acid	231-801-5	7738-94-5		
Dichromic acid	236-881-5	13530-68-2		
Sodium dichromate	234-190-3	10588-01-9	21 September 2017	CCST, GCCA, Gentrochema BV
Sodium dichromate dihydrate	234-190-3	7789-12-0	21 September 2017	CCST, GCCA, Gentrochema BV
Sodium chromate	231-889-5	7775-11-3	21 September 2017	GCCA
Potassium dichromate	231-906-6	7778-50-9	21 September 2017	CCST, GCCA, Gentrochema BV
Strontium chromate	232-142-6	7789-06-2	22 January 2019	CCST, GCCA
Dichromium tris(chromate)	246-356-2	24613-89-6	22 January 2019	CCST, GCCA
Potassium hydroxyoctaoxodizincatedichromate	234-329-8	11103-86-9	22 January 2019	CCST
Pentazinc chromate octahydroxide	256-418-0	49663-84-5	22 January 2019	CCST, Indestructible Paint

Current technology requires and/or specifies the continued use of these chromates in aerospace and defence production and maintenance operations. If you still use any of these chromates in your products, please be aware that:

- Unless your uses are covered by an Authorisation held by yourself or an upstream supplier, then you will have had to cease using the substance or any mixture containing it **in the EEA, NI or GB** as of the sunset date (in 2017 or 2019).
- Upstream Authorisation applications were submitted and have been approved for the continued use of substances containing hexavalent chromium for aerospace and defence applications. Details of all Authorisations can be found on the [European Chemical Agency's \(ECHA\) Authorisation Applications website](#). These Authorisations are also relevant for operators working under UK REACH, since they are recognized by the new regulation because they were finalized under EU REACH prior to the official Brexit date.
- There are several upstream applications for Authorisation that cover generic uses of chromium trioxide, as well as for specific aerospace and defence uses of chromium trioxide and other chromates. These applications were completed by the following consortia or other applicants (click link for additional information) to allow use of chromates by downstream users:
 - [Chromium Trioxide Authorisation Consortium \(CTAC\)](#)
 - Contains links for details on the approved Authorisations, press releases, Q&A from the consortium, Good Practice Sheets, and Key Functionalities Notification Templates
 - Scroll through the webpage to find relevant links. Some links are listed by the relevant chromate
 - [Chromium VI Compounds for Surface Treatment Consortium \(CCST\)](#)
 - Contains links for details on the approved Authorisations, press releases, Q&A from the consortium, Good Practice Sheets, and Key Functionalities Notification Templates
 - Scroll through the webpage to find relevant links. Some links are listed by the relevant chromate
 - [Global Chromate Consortium for Aerospace Consortium \(GCCA\)](#)
 - Contains links for details on the approved Authorisations, as well as, a [GCCA Authorisation Toolbox](#)
 - Within the toolbox, you will find ECHA notification guidance and a Key Functionalities' reporting tool, as well as worker and environmental monitoring guidance and templates, Q&A, instructional webinars and Exposure Scenarios for the various GCCA-sponsored Authorisations
 - At the bottom of the Toolbox is a link to a Chromate Consortia Authorisation summary sheet
 - **Please refer to the [Aerospace-AfAs-Quick-Reference table](#) found at the bottom of the [GCCA Authorisation Toolbox](#) for the latest version of a summary table of all CTAC, CCST & GCCA-sponsored hexavalent chromium Authorisations, including critical regulatory compliance dates and links to Commission decisions and required conditions of use for each Authorisation. This document is kept up to date by GCCA.**
 - [Gentrochema BV \(Chemical Importer/Distributor\)](#)
 - Contains links to the approved Authorisations
 - [Indestructible Paint \(Chemical Formulator\)](#)
 - Contains links to the approved Authorisations

For all the above, ensure that you scroll the entire webpages for relevant information and document links, as they may be at the bottom and out of sight.

If you use any of these substances, either by themselves or in formulations, in the EEA, NI or GB, you can continue to use them, provided you can demonstrate that a company up your supply chain holds one of the authorisations (indicated by an applicable Authorisation number appearing on the product label and Safety Data Sheet), and you follow all requirements defined in the relevant Safety Data Sheets. Additionally, you should:

- Confirm your use is consistent with an applied-for use granted to your upstream supplier
 - If in doubt, consult the supplier of the chemical product and ask them to identify the relevant Authorisation(s)
- Implement Environmental, Health and Safety risk controls, in accordance with conditions of use contained in the relevant Authorisation(s):
 - You must be following the Risk Management Measures (RMMs) & exposure scenarios (ESs) from the latest version of the relevant SDSs and Authorisation decisions.
 - You must also complete worker & environmental exposure assessments, as defined in the conditions of each Authorisation and provide the results to the authorities.
 - If in doubt, consult the supplier of the chemical product and/or the relevant Authorisation dossier (in particular the chemical safety report), which is available on the [ECHA website](#). Once you locate the relevant Authorisation, click on *Details* link on the far right of the page. Once on the Authorisation- specific page, links to the *Adopted Commission Decision* and *Authorisation Decision* can be found at the bottom of the page.
- Under REACH Article 66, you must notify ECHA (if you are in the EEA or NI) or the Health and Safety Executive (HSE) (if you are in GB) of your uses within 3 months of the chemical being supplied with the Authorisation number included on the label, in accordance with REACH requirements:
 - Refer to [ECHA's instructional page](#) for details of submitting notifications for authorised uses.
 - Per REACH Article 66 (2) these notifications will be shared with relevant member state enforcement authorities in the EEA and NI (under EU REACH) and with appropriate authorities in GB (under UK REACH).
 - The [GCCA Authorisation Toolbox](#) also offers an instructional video on how to submit a notification.
 - Both [GCCA](#) and [CCST](#) websites contain tools for Key Functionality reporting that is required as part of Article 66 notifications

As a reminder, please refer to the [Aerospace-AfAs-Quick-Reference table](#) found at the bottom of the [GCCA Authorisation Toolbox](#) for the latest version of a summary table of all CTAC, CCST, GCCA, Indestructible Paint and Gentrochema -sponsored upstream hexavalent chromium Authorisations, including critical regulatory compliance dates and links to Commission decisions and required conditions of use for each Authorisation.

Summary of Aerospace-related Upstream Chromate Authorisations

Note: This summary does not include information on Authorisations specific to formulation using hexavalent chromium

SVHC	CAS #	Use Description	Applicant	Application Number	REACH Authorisation Number	Sponsoring Consortium
Chromium trioxide	1333-82-0	Functional Chrome Plating	Chemservice GmbH (OR) (formerly LANXESS Deutschland GmbH) Atotech Deutschland GmbH Boeing Distribution, Inc. (formerly Aviall Services Inc) Prospere Chemical Logistic OÜ (OR) (formerly BONDEX TRADING LTD) CROMITAL S.P.A. (OR) Elementis Minerals B.V. (OR) [application transferred from: Elementis Chromium LLP (OR)] MacDermid Enthone GmbH (formerly Enthone GmbH)	0032-02	REACH/20/18/7 REACH/20/18/8 REACH/20/18/9 REACH/20/18/10 REACH/20/18/11 REACH/20/18/12 REACH/20/18/13	(CTAC)
Chromium trioxide	1333-82-0	Surface treatment for applications in the <i>aeronautics and aerospace industries</i> , unrelated to Functional chrome plating or Functional chrome plating with decorative character	Chemservice GmbH (OR) (formerly LANXESS Deutschland GmbH) Atotech Deutschland GmbH Boeing Distribution, Inc. (formerly Aviall Services Inc) Prospere Chemical Logistic OÜ (OR) (formerly BONDEX TRADING LTD) CROMITAL S.P.A. (OR) Elementis Minerals B.V. (OR) [application transferred from: Elementis Chromium LLP (OR)] MacDermid Enthone GmbH (formerly Enthone GmbH)	0032-04	REACH/20/18/14 REACH/20/18/15 REACH/20/18/16 REACH/20/18/17 REACH/20/18/18 REACH/20/18/19 REACH/20/18/20	(CTAC)
Chromium trioxide	1333-82-0	Use of chromium trioxide for chemical conversion and slurry coating applications by aerospace companies and their suppliers	HAAS GROUP INTERNATIONAL SP. Z.O.O [application transferred from: "Wesco Aircraft EMEA, LTD" due to a notified legal entity change. Previously application transferred from original applicant: Haas Group International SCM Ltd due to a notified legal entity change]	0096-01	REACH/19/29/0	(GCCA)

Dichromium (tris) chromate	24613-89-6	Use of dichromium tris(chromate) for surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites, sealings of anodic films	Henkel AG & Co. KGaA, Henkel Global Supply Chain B.V.	0045-02	REACH/20/1/2 REACH/20/1/3	(CCST)
Dichromium (tris) chromate	24613-89-6	Use of dichromium tris(chromate) for chemical conversion coating applications by aerospace and defence companies	HAAS GROUP INTERNATIONAL SP. Z.O.O [application transferred from: "Wesco Aircraft EMEA, LTD (UK)" due to a notified legal entity change]	0116-01	REACH/20/10/0	(GCCA)
Pentazinc chromate octahydroxide	49663-84-5	Use of pentazinc chromate octahydroxide in wash primer, fuel tank primer and aluminized primer for the purpose of corrosion protection in aeronautic applications	Boeing Distribution, Inc (formerly Aviall Services Inc) Finalin GmbH	0118-02	REACH/20/11/2 REACH/20/11/3	(CCST)
Pentazinc chromate octahydroxide	49663-84-5	Formulation of mixtures.	Indestructible Paint Ltd.	0121-01	REACH/19/26/0	(Indestructible Paint)
Pentazinc chromate octahydroxide	49663-84-5	Use in stoved epoxy primer for corrosion protection of aircraft engine components in aerospace and aeroderivative applications.	Ramboll Belgium BVBA [application transferred from: "Indestructible Paint Ltd." due to a notified legal entity change]	0121-02	REACH/19/26/1	(Indestructible Paint)
Potassium Dichromate	7778-50-9	Use of potassium dichromate for surface treatment of metals such as aluminum, steel, zinc, magnesium, titanium, alloys, composites and sealings of anodic films	Brenntag UK Ltd	0044-02	REACH/20/3/1	(CCST)
Potassium Dichromate	7778-50-9	Use of potassium dichromate for sealing after anodizing applications by aerospace companies and their suppliers	HAAS GROUP INTERNATIONAL SP. Z.O.O [application transferred from: "Wesco Aircraft EMEA, LTD" due to a notified legal entity change. Previously application transferred from original applicant: Haas Group International SCM Ltd due to a notified legal entity change]	0098-01	REACH/19/31/0	(GCCA)
Potassium Dichromate	7778-50-9	Formulation of mixtures for surface treatment of metals (such as aluminium, steel, zinc, magnesium, titanium, alloys), composites and sealings of anodic films intended exclusively for use REACH/20/2/1	Gentrochema BV	0062-01	REACH/20/2/0	(Gentrochema BV -LoA to CCST P1)

Potassium Dichromate	7778-50-9	Surface treatment of metals (such as aluminium, steel, zinc, magnesium, titanium, alloys), composites and sealings of anodic films for the aerospace sector in surface treatment processes in which any of the key functionalities listed in the Annex is required	Gentrochema BV	0062-02	REACH/20/2/1	(Gentrochema BV -LoA to CCST P1)
Potassium hydroxyoctaoxidizincatedichromate	11103-86-10	Use of potassium hydroxyoctaoxidizincatedichromate in paints, in primer, sealants, and coatings (including as wash primers) (for applications in the aeronautics and aerospace industries,)	PPG Industries (UK) Finalin PPG Europe B.V. in its legal capacity as Only Representative of PRC DeSoto International Inc [application transferred from original Applicant: "PPG Central (UK) Ltd in its legal capacity as Only Representative of PRC DeSoto International Inc." due to a notified change of Only Representative] PPG Coatings SA Boeing Distribution, Inc (formerly Aviall Services Inc)	0047-02	REACH/20/6/5 REACH/20/6/6 REACH/20/6/7 REACH/20/6/8 REACH/20/6/9	(CCST)
Sodium chromate	7775-11-3	Use of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by aerospace companies and their suppliers	Boeing Distribution, Inc. (formerly Aviall Services Inc) HAAS GROUP INTERNATIONAL SP. Z.O.O [application transferred from: Wesco Aircraft EMEA, LTD]	0099-02	REACH/19/32/2 REACH/19/32/3	(GCCA)
Sodium Dichromate	7789-12-0 10588-01-9	Use of Sodium dichromate for surface treatment of metals such as aluminum, steel, zinc, magnesium, titanium, alloys, composites and sealings of anodic films	Brenntag UK Ltd Henkel AG & Co. KGaA AD International BV	0043-02	REACH/20/5/3 REACH/20/5/4 REACH/20/5/5	(CCST)
Sodium Dichromate	7789-12-0 10588-01-9	Use of sodium dichromate for sealing after anodizing applications by aerospace companies and their suppliers	HAAS GROUP INTERNATIONAL SP. Z.O.O [application transferred from: Wesco Aircraft EMEA, LTD]International SCM Ltd due to a notified legal entity change]	0097-01	REACH/20/14/0	(GCCA)
Strontium Chromate	7789-06-2	Application of paints, primers and specialty coatings containing Strontium Chromate in the construction of aerospace and aeronautical parts, including aeroplanes / helicopters, spacecraft,	AKZO Nobel Car Refinishes B.V. Habich GmbH Henkel Global SupplyChain B.V. Ramboll Belgium BVBA [application transferred from: Indestructible Paint Ltd.] Finalin GmbH	0046-02	REACH/20/7/10 REACH/20/7/11 REACH/20/7/12 REACH/20/7/13 REACH/20/7/14	(CCST)

		satellites, launchers, engines, and for the maintenance of such constructions.	Mapaero PPG Europe B.V. (OR) [application transferred from: PPG Central (UK) Ltd (OR)] PPG Industries (UK) Ltd PPG Coatings SA Boeing Distribution, Inc. [formerly Aviall Services Inc]		REACH/20/7/15 REACH/20/7/16 REACH/20/7/17 REACH/20/7/18 REACH/20/7/19	
Strontium Chromate	7789-06-2	Use of strontium chromate in primers applied by aerospace and defence companies and their associated supply chains.	HAAS GROUP INTERNATIONAL SP. Z.O.O [application transferred from: Wesco Aircraft EMEA, LTD (UK); PPG Europe B.V. (OR) [application transferred from: PPG Central (UK) Ltd (OR)] Cytec Engineered Materials GmbH (OR) [application transferred from: Cytec Engineered Materials Ltd. (OR)]	0117-01	REACH/20/12/0 REACH/20/12/1 REACH/20/12/2	(GCCA)

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