

### **REACH Authorisation and Hexavalent Chrome**

[REACH](#) (Registration, Evaluation, Authorisation and Restriction of Chemicals) is a European Union regulation. The following hexavalent chromium compounds (chromates) have been listed in the Authorisation List SVHCs (Annex XIV) of REACH:

<b>Substance Name</b>	<b>CAS Number</b>
Acids generated from chromium trioxide and their oligomers. Names of the acids and their oligomers: Chromic acid, Dichromic acid, Oligomers of chromic acid and dichromic acid.	7738-94-5 13530-68-2
Chromium trioxide	1333-82-0
Potassium dichromate	7778-50-9
Sodium chromate	7775-11-3
Sodium dichromate	7789-12-0 10588-01-9
Dichromium tris(chromate)	24613-89-6
Pentazinc chromate octahydroxide	49663-84-5
Potassium hydroxyoctaoxodizincatedichromate	11103-86-9
Strontium chromate	7789-06-2

Where substances are included in [Authorisation List SVHCs \(Annex XIV\)](#) of REACH, their use in the European Economic Area (EEA), whether on their own or in mixtures, will be prohibited after the relevant [sunset date](#) unless an authorisation is held by the user or an upstream supplier.

Current technology requires /or specifies the continued use of these chromates in aerospace and defence production and maintenance operations. The sunset date for the first group of chromates is 21 September 2017.

If you still use any substances in this group of chromates, please be aware that:

- Unless your uses are covered by an application for authorisation held by yourself or an upstream supplier, then you will have to cease using the substance or any mixture containing it *in the EEA* from the sunset date (21 September 2017).
- A number of authorisation applications have been submitted for the continued use of substances containing hexavalent chrome. Details of all authorisations submitted can be found on the [European Chemical Agency's \(ECHA\) Authorisation Applications website](#)
- There are several upstream applications for authorisation that cover generic uses of chromium trioxide, and specific aerospace and defence uses of chromium trioxide and other chromates (see also Appendix A of this letter for a summary of some relevant

Authorisation applications). These have been created by consortia and submitted by upstream applicants (importers / distributors / formulators). Links to the applications and their most recent press releases are below:

- **Chromium Trioxide Authorisation Consortium (CTAC) application [0032-01](#), [0032-02](#), [0032-04](#), & [0032-05](#)**
  - [CTAC Consortium February 2015 Press Release](#) – overview of consortium
  - [CTACSub Consortium May 2015 Press Release](#) – summary of applications and list of applicants
  - [CTACSub Consortium January 2017 Press Release](#) – Announcement of RAC & SEAC recommendations for approval
  - [CTACSub Consortium Questions and Answers \(14 July 2017\)](#)
- **Chromium VI Compounds for Surface Treatment (CCST) applications [0043-01](#), [0043-02](#), [0044-01](#), [0044-02](#), [0045-01](#), [0045-02](#), [0046-01](#), [0046-02](#), [0047-01](#), [0047-02](#), [0118-01](#) & [0118-02](#)**
  - [CCST Consortium December 2015 Press Release](#) – Summary of applications by substance & use; list of applicants
  - [CCST Consortium February 2017 Press Release](#) – Announcement of RAC & SEAC recommendations for approval
  - [CCST Consortium Questions and Answers \(4 September 2017\)](#)
- **Global Chromates Consortium for Aerospace (GCCA) applications [0096-01](#), [0097-01](#), [0098-01](#), [0099-01](#), [0099-02](#), [0116-01](#), & [0117-01](#)**
  - [GCCA Consortium](#) – consortium overview
  - [GCCA Consortium Sept 2017 Press Release](#) – Status announcement of authorisation applications for chromates with a sunset date of 21 Sept 2017
  - [GCCA Consortium Sept 2017 Press Release](#) – Status announcement of authorisation applications for chromates with a sunset date of 22 January 2019

The final decisions for these authorisations may not be made until after the sunset date. If you use any of these substances, either by themselves or in formulations *in the EEA*, **you can continue to use them**, provided you can demonstrate that a company up your supply chain has applied for authorisation for your use(s) before the latest application date for the substance(s) and you follow all requirements defined in the relevant Safety Data Sheets (SDS(s)).

**If you use any of the chromates with September 2017 sunset dates *in the EEA*, you need to:**

- 1) Confirm your use is consistent with an applied-for use in your upstream supplier's authorisation application.

- If in doubt, consult the supplier of the chemical product and ask them to identify the relevant authorisation application(s).
- 2) Implement Environmental, Health and Safety risk controls, in accordance with conditions of use contained in the relevant authorisation application(s).
- You must be following the risk management measures & exposure scenarios from the latest version of the relevant SDSs.
  - 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](#).
- 3) After the authorisation is granted, you will need to notify ECHA 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 the European Chemical Agency (ECHA), these notifications will be shared with relevant member state enforcement authorities.
- 4) It is highly recommended that the contents of this letter be communicated to sub-tier suppliers as required.

If you have concerns, please contact your customer representative, found on the [IAEG Work Group 5's webpage](#) member list.

Sincerely,



**Phil Humphries**

Work Group Lead, IAEG Work Group 5 on Authorisation

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## Appendix A: Summary of relevant Authorisation applications

Substance	ECHA Consultation Number	Use title	Applicant
<b>Chromium trioxide</b> <b>1332-82-0</b> (CTAC)	0032-01	Formulation of mixtures	LANXESS Deutschland GmbH, Atotech Deutschland GmbH, Aviall Services Inc, BONDEX TRADING LTD, CROMITAL S.P.A., Elementis Chromium, Enthone GmbH
<b>Chromium trioxide</b> <b>1332-82-0</b> (CTAC)	0032-02	Functional Chrome Plating	LANXESS Deutschland GmbH, Atotech Deutschland GmbH, Aviall Services Inc, BONDEX TRADING LTD, CROMITAL S.P.A., Elementis Chromium, Enthone GmbH
<b>Chromium trioxide</b> <b>1332-82-0</b> (CTAC)	0032-04	Surface treatment <i>for applications in the aeronautics and aerospace industries</i> , unrelated to Functional chrome plating or Functional chrome plating with decorative character	LANXESS Deutschland GmbH, Atotech Deutschland GmbH, Aviall Services Inc, BONDEX TRADING LTD, CROMITAL S.P.A., Elementis Chromium, Enthone GmbH
<b>Chromium trioxide</b> <b>1332-82-0</b> (CTAC)	0032-05	Surface treatment (except passivation of tin-plated steel (ETP)) for applications in various industry sectors namely architectural, automotive, metal manufacturing and finishing, and general engineering (unrelated to Functional chrome plating or Functional chrome plating with decorative character)	LANXESS Deutschland GmbH, Atotech Deutschland GmbH, Aviall Services Inc, BONDEX TRADING LTD, CROMITAL S.P.A., Elementis Chromium, Enthone GmbH
<b>Sodium Dichromate</b> <b>7789-12-0,</b> <b>10588-01-9</b> (CCST)	0043-01	Formulation of mixtures	Brenntag UK Ltd, Henkel AG & Co. KGaA, AD International BV
<b>Sodium Dichromate</b> <b>7789-12-0,</b> <b>10588-01-9</b> (CCST)	0043-02	Use of Sodium dichromate for surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites and sealings of anodic films (for applications in the aeronautics and aerospace industries,)	Brenntag UK Ltd, Henkel AG & Co. KGaA, AD International BV
<b>Potassium Dichromate</b> <b>7778-50-9</b> (CCST)	0044-01	Formulation of mixtures	Brenntag UK Ltd
<b>Potassium Dichromate</b> <b>7778-50-9</b> (CCST)	0044-02	Use of potassium dichromate for surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites and sealings of anodic films (for applications in the aeronautics and aerospace industries,)	Brenntag UK Ltd

<b>Chromium trioxide</b> <b>1332-82-0</b> (GCCA)	0096-01	Use of chromium trioxide for chemical conversion and slurry coating applications by aerospace companies and their suppliers	Wesco Aircraft EMEA, LTD.
<b>Sodium Dichromate</b> <b>7789-12-0,</b> <b>10588-01-9</b> (GCCA)	0097-01	Use of sodium dichromate for sealing after anodizing applications by aerospace companies and their suppliers	Wesco Aircraft EMEA, LTD.
<b>Potassium Dichromate</b> <b>7778-50-9</b> (GCCA)	0098-01	Use of potassium dichromate for sealing after anodizing applications by aerospace companies and their suppliers	Wesco Aircraft EMEA, LTD.
<b>Sodium chromate</b> <b>231-889-5</b> (GCCA)	0099-01	Formulation of Mixtures of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by aerospace companies and their suppliers	Avial Services Inc Wesco Aircraft EMEA, LTD.
<b>Sodium chromate</b> <b>231-889-5</b> (GCCA)	0099-02	Use of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by aerospace companies and their suppliers	Avial Services Inc Wesco Aircraft EMEA, LTD.
<b>Dichromium (tris) chromate*</b> <b>24613-89-6</b> (CCST)  * 22 January 2019 sunset date	0045-01	Formulation of mixtures	Henkel AG & Co. KGaA, Henkel Global Supply Chain B.V.
<b>Dichromium (tris) chromate*</b> <b>24613-89-6</b> (CCST)  * 22 January 2019 sunset date	0045-02	Use of dichromium tris(chromate) for surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites, sealings of anodic films (for applications in the aeronautics and aerospace industries,)	Henkel AG & Co. KGaA, Henkel Global Supply Chain B.V.
<b>Strontium Chromate*</b> <b>7789-06-2</b> (CCST)  * 22 January 2019 sunset date	0046-01	Formulation of mixtures	AKZO Nobel Car Refinishes B.V. Habich GmbH Henkel Global SupplyChain B.V. Indestructible Paint Ltd. Finalin GmbH Mapaero PPG Central (UK) Ltd in its legal capacity as OnlyRepresentative of PRCDeSoto International Inc. - OR5 PPG Industries (UK) Ltd PPG Coatings SA Avial Services Inc
<b>Strontium Chromate*</b> <b>7789-06-2</b> (CCST)  * 22 January 2019 sunset date	0046-02	Application of paints, primers and specialty coatings containing Strontium Chromate in the construction of aerospace and aeronautical parts, including aeroplanes / helicopters, spacecraft, satellites, launchers, engines, and for the maintenance of such constructions.	AKZO Nobel Car Refinishes B.V. Habich GmbH Henkel Global SupplyChain B.V. Indestructible Paint Ltd. Finalin GmbH Mapaero PPG Central (UK) Ltd in its legal capacity as OnlyRepresentative of PRCDeSoto International Inc. - OR5 PPG Industries (UK) Ltd PPG Coatings SA Avial Services Inc

<p><b>Potassium hydroxyoctaoxidizin catedichromate*</b>  <b>11103-86-9</b>  (CCST)</p> <p>* 22 January 2019 sunset date</p>	0047-01	Formulation of mixtures	PPG Industries (UK) Ltd Finalin GmbH PPG Central (UK) Ltd in its legal capacity as Only Representative of PRC DeSoto International Inc. - OR5 PPG Coatings SA Aviall Services Inc
<p><b>Potassium hydroxyoctaoxidizin catedichromate*</b>  <b>11103-86-9</b>  (CCST)</p> <p>* 22 January 2019 sunset date</p>	0047-02	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) Ltd Finalin GmbH PPG Central (UK) Ltd in its legal capacity as Only Representative of PRC DeSoto International Inc. - OR5 PPG Coatings SA Aviall Services Inc
<p><b>Pentazinc chromate octahydroxide*</b>  <b>49663-84-5</b>  CCST</p> <p>* 22 January 2019 sunset date</p>	0118-01	Formulation of mixtures for Use 2 except on-site formulation for Use 2 which is considered to be covered by Use 2	Aviall Services Inc Finalin GmbH
<p><b>Pentazinc chromate octahydroxide*</b>  <b>49663-84-5</b>  CCST</p> <p>* 22 January 2019 sunset date</p>	0118-02	Use of pentazinc chromate octahydroxide in wash primer, fuel tank primer and aluminized primer for the purpose of corrosion protection in aeronautic applications	Aviall Services Inc Finalin GmbH
<p><b>Dichromium (tris) chromate*</b>  <b>24613-89-6</b>  (GCCA)</p> <p>* 22 January 2019 sunset date</p>	0116-01	Use of dichromium tris(chromate) for chemical conversion coating applications by aerospace and defence companies and their associated supply chains	Wesco Aircraft EMEA, LTD.
<p><b>Strontium Chromate*</b>  <b>7789-06-2</b>  (GCCA)</p> <p>* 22 January 2019 sunset date</p>	0117-01	Use of strontium chromate in primers applied by aerospace and defence companies and their associated supply chains	Wesco Aircraft EMEA, LTD.; PPG Central (UK) Ltd. in its legal capacity as Only Representative of PRC DeSoto International Inc. – OR5; Cytec Engineered Materials Ltd. in its legal capacity as Only Representative of Cytec Industries Inc.