Notice to Suppliers

Requirements of REACH Authorisation

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For the attention of the Managing Director and Quality Manager

Scope/Applicability:

All Rolls-Royce plc suppliers / partners in the European Economic Area and the United Kingdom.

Dear Supply Partner,

Introduction:

REACH Authorisation - Hexavalent Chromium Compounds

REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) is a European Union regulation.

REACH Authorisations for Hexavalent Chromium compounds, which are relevant to the Rolls-Royce supply chain, have been agreed by the European Commission (EC) in accordance with Article 60(4) of REACH. However, the EC has not yet published decisions on all the initial applications for REACH authorisation of the chromates in the official journal. Although it is anticipated that all uses applied for will be granted Authorisation, in some cases the review period will be short (4 years).

Downstream users may continue to use these chromates, on their own or in mixtures, provided they are ultimately sourced from a supply chain covered by a relevant upstream authorisation applicant. Downstream users must comply with the risk management measures and operational conditions of use described in the authorisation decisions, and comply with the relevant exposure scenarios in the latest version of the safety data sheet provided by the supplier.

If you use Hexavalent Chromium compounds or formulations containing these, and you or your supply chain are based in the EEA and the UK, then continued use may be covered by one or more of the following applications for Authorisation.

Links to the most recent press releases and upstream authorisation application updates are below:

- Chromium Trioxide Authorisation Consortium (CTAC) Application (0032 - 01, 0032 - 02, 0032-04, 0032-05).
  - Chromium Trioxide draft decision and Annex.
  - CTAC Sub Consortium Questions and Answers (19 September 2019)
- Chromium VI Compounds for Surface Treatment (CCST) Application (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 Questions and Answers (23 September 2019)
  - CCST Pentazinc draft Authorisation decision

- Global Chromates Consortium for Aerospace (GCCA) applications (0096-01, 0097-01 , 0098-01, 0099-01, 0099-02, 0116-01, & 0117-01).
  - GCCA Authorisation Toolbox
  - GCCA News Bulletin No. 2019-03
  - Please refer to previous communications from GCCA for overview on the legal requirements for downstream users of authorised substances (GCCA News Bulletin No. 2019-01 and No. 2019-02).
- Pentazinc chromate octahydroxide - Indestructible Paint applications (0121-01, 0121-02).
  - Commission Implementing Decision Link
  - Pentazinc chromate octahydroxide Summary of European Decision
- Chromium Trioxide - HAPOC GmbH & Co KG applications (0064-01, 0064-02, 0064-03, 0064-04).

To continue using any substances in this group of chromates, please be aware that you need to:

1. Notify your uses to ECHA under Article 66 of REACH within 3 months of the publication of the authorisation decision and comply with any conditions of use mandated by such a decision.
   - ECHA will share these notifications with relevant member state enforcement authorities and some information may be made public.
   - Refer to ECHA's instructional page for details of submitting notifications for authorised uses.
2. Make sure that your uses are in line with the relevant exposure scenarios in the latest safety data sheet provided by your upstream supplier, and also with any operational conditions and risk management measures set out in the relevant authorisation decision.
3. Where required by specific Authorisation conditions complete annual worker exposure and environmental (air emissions and waste water) monitoring, the first of which must be completed within 6 months of the date of adoption of the authorisation decision.
   - Ensure that any required monitoring data is completed in the mandated templates where these are provided by the Authorisation holder as a condition of the Authorisation decision.
4. Submit the results of monitoring data programmes to ECHA in accordance with the timelines laid out in the specific final authorisation decision.
5. Please communicate this NTS to sub-tier suppliers as required.

If you have concerns please contact your designated REACH Competent Authority.

NTS Category:

General Information / Communication

Authorised by:

Steve George
REACH programme Executive

Table 1 - CCST Authorisations

Substance	CAS number	Applicant(s)	Consultation Number on ECHA Website	Use	Review Period
Sodium dichromate	10588-01-9 7789-12-0	Brenntag UK Ltd Henkel AG & Co. KGaA AD International BV	0043-01	Formulation of mixtures	7 years recommended
			0043-02	Surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites and sealings of anodic films.	7 years recommended
Potassium dichromate	7778-50-9	Brenntag UK Ltd	0044-01	Formulation of mixtures	7 years recommended
			0044-02	Surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites, sealings of anodic films	7 years recommended
Dichromium tris(chromate)	24613-89-6	Henkel AG & Co. KGaA Henkel Global Supply Chain B.V.	0045-01	Formulation of mixtures	7 years recommended
			0045-02	Surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites, sealings of anodic films.	7 years recommended

Table 2 - CCST Authorisations

Substance	CAS number	Applicant(s)	Consultation Number on ECHA Website	Use	Review Period
Strontium chromate	7789-06-2	AKZO Nobel Car Refinishes B.V. Habich GmbH Henkel Global Supply Chain B.V. Indestructible Paint Ltd. Finalin GmbH Mapaero PPG Central (UK) Ltd in its legal capacity as Only Representative of PRCDeSoto International Inc. - OR5 PPG Industries (UK) Ltd PPG Coatings SA Aviall Services Inc.	0046-01	Formulation of mixtures	7 years recommended
			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.	7 years recommended
Potassium hydroxyoctaoxodizincatedichromate	11103-86-9	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.	0047-01	Formulation of mixtures	7 years recommended
			0047-02	Use of potassium hydroxyoctaoxodizincatedichroma te in paints, in primer, sealants, and coatings (including as wash primers)	7 years recommended
Pentazinc chromate octahydroxide	49663-84-5	Aviall Services Inc; Finalin GmbH	0118-01	Formulation of mixture	7 years recommended
			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	7 years recommended

Table 3 - GCCA REACH Authorisations

Substance	CAS number	Applicant(s)	Consultation Number / Authorisation Number	Use	Review Period
Chromium trioxide	1333-82-0	Wesco	0096-01 REACH/19/29/0	Chemical conversion and slurry coating applications by the aerospace sector, where any of the following key functionalities or properties is necessary for the intended use: corrosion resistance, active corrosion inhibition, adhesion promotion and reproducibility (for chemical conversion coating), corrosion protection, heat resilience, hot corrosion resistance, resistance to humidity and hot water, thermal shock resistance, adhesion and flexibility (for slurry coating)	7 years from the Sunset Date 21/09/2024.
Sodium chromate	7775-11-3	Aviall Services Inc. Wesco	0099-01 REACH/19/32/2	Formulation of mixtures for sealing after anodizing, chemical conversion coating, pickling and etching applications by the aerospace sector.	7 years from the Sunset Date 21/09/2024.
			0099-02 REACH/19/32/3	Sealing after anodizing, chemical conversion coating, pickling and etching applications by the aerospace sector, where any of the following key functionalities or properties is necessary for the intended use: for the pickling/etching process - etch rate, intergranular attack/end grain pitting, surface contamination, fatigue testing, tensile testing, surface roughness, impact to shot peen compressive layer; and for the chemical conversion coating and sealing after anodising process - corrosion resistance, active corrosion inhibition, adhesion promotion, chemical resistance, layer thickness, electrical properties	7 years from the Sunset Date 21/09/2024.
Potassium dichromate	7778-50-9	Wesco	0098-01 REACH/19/31/0	Sealing after anodizing applications by the aerospace sector, where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use.	7 years from the Sunset Date 21/09/2024
Sodium dichromate	10588-01-9; 7789-12-0	Wesco	0097-01	Sealing after anodizing applications by the aerospace sector, where the key functionalities of corrosion resistance or corrosion inhibition are necessary for the intended use.	7 years recommended
Dichromium (tris) chromate	24613-89-6	Wesco	0116-01	Use of dichromium (tris) chromate for chemical conversion coating applications by aerospace and defence companies and their associated supply chain.	7 years recommended
Strontium chromate	7789-06-2	Wesco PPG Cytec	0117-01	Use of strontium chromate in primers applied by aerospace and defence companies and their associated supply chains.	7 years recommended

Table 4 – Chromium Trioxide "CTAC" Authorisations

Substance	CAS Number	Applicant(s)	Consultation Number on ECHA Website	Use	Review Period
Chromium trioxide	1333-82-0	LANXESS Deutschland GmbH Atotech Deutschland GmbH Aviall Services Inc. Prospere Logistic Baltic OÜ CROMITAL S.P.A. Elementis Chromium LLP MacDermid Enthone GmbH	0032 - 01	Formulation of Mixtures	7 years from Sunset date Recommended
Chromium trioxide	1333-82-0	LANXESS Deutschland GmbH Atotech Deutschland GmbH Aviall Services Inc. Prospere Logistic Baltic OÜ CROMITAL S.P.A. Elementis Chromium LLP MacDermid Enthone GmbH	0032 - 02	Functional chrome plating	7 years from Sunset date Recommended
Chromium trioxide	1333-82-0	LANXESS Deutschland GmbH Atotech Deutschland GmbH Aviall Services Inc. Prospere Logistic Baltic OÜ CROMITAL S.P.A. Elementis Chromium LLP MacDermid Enthone GmbH	0032 - 04	Surface treatment for applications in the aeronautics and aerospace industries (unrelated to functional chrome plating or functional chrome plating with decorative character)	7 years from Sunset date Recommended
Chromium trioxide	1333-82-0	LANXESS Deutschland GmbH Atotech Deutschland GmbH Aviall Services Inc. Prospere Logistic Baltic OÜ CROMITAL S.P.A. Elementis Chromium LLP MacDermid Enthone GmbH	0032 - 05	Miscellaneous surface treatment – except passivation of tin-plated steel (electrolytic tin plating –ETP)	4 years from the date of Authorisation decision Recommended

Table 5 - Pentazinc chromate octahydroxide/ Indestructible Paint

Substance	CAS Number	Applicant(s)	Consultation Number /Authorisation Number	Use	Review Period
Pentazinc chromate octahydroxide	49663-84-5	Indestructible Paint Ltd.	0121-01 REACH/19/26/0	Formulation of mixtures	12 years from Sunset date 22/01/2031.
			0121-02 REACH/19/26/1	Use of pentazinc chromate octahydroxide in stoved epoxy primer for corrosion protection of aircraft engine components in aerospace and aeroderivative applications.	12 years from Sunset date 22/01/2031.

Table 6 - Chromium Trioxide – HAPOC GmbH & Co KG

Substance	CAS Number	Applicant(s)	Consultation Number on ECHA Website	Use	Review Period
Chromium Trioxide	1333-82-0	HAPOC GmbH & Co KG	0064-01	Use of chromium trioxide in dissolved and solid form to produce aqueous solutions of any composition for industrial application.	4 years recommended
			0064-02	Use of Chromium trioxide in solid form and in aqueous solution of any composition to modify the properties of surfaces made of metal or plastic, with or without current flow, in category III.	4 years recommended
			0064-03	Use of chromium trioxide in solid form and in aqueous solution of any composition to modify the properties of surfaces made of metal or plastic, with or without current flow, in category II.	4 years recommended
			0064-04	Use of Chromium trioxide in solid form and in aqueous solution of any composition to modify the properties of surfaces made of metal or plastic, with or without current flow, in category I.	4 years recommended