

Requirements of REACH Authorisation

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For the attention of the Managing Director and Quality Manager

Dear Sir or Madam,

Scope/Applicability:

All Rolls-Royce suppliers / partners in the European Economic Area.

REACH Authorisation and Hexavalent Chrome

Introduction:

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

Substance Name	CAS Number	Sunset Date
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	21/09/2017
Chromium trioxide	1333-82-0	21/09/2017
Potassium dichromate	7778-50-9	21/09/2017
Sodium chromate	7775-11-3	21/09/2017
Sodium dichromate	7789-12-0 10588-01-9	21/09/2017
Dichromium tris(chromate)	24613-89-6	22/01/2019
Pentazinc chromate octahydroxide	49663-84-5	22/01/2019
Potassium hydroxyoctaoxodizincatedichromate	11103-86-9	22/01/2019
Strontium chromate	7789-06-2	22/01/2019

- 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 was the 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.
- Details of the authorisations submitted can be found on the European Chemical Agency's (ECHA) website (link [here](#)).
- There are several upstream applications for authorisation known to be covering generic uses of chromium trioxide and specific aerospace and defence uses of other chromates. These have been created by consortia and submitted by upstream applicants.

Links to their most recent press releases are below:

- Chromium Trioxide Authorisation Consortium (CTAC) Application (0032 - 01, 0032 - 02, 0032-04, & 0032 05).
 - [Overview of Consortium](#)
 - [Summary of Applications and List of Applicants](#)
 - [Announcement of RAC & SEAC Recommendations for Approval](#)
 - [CTACSub Consortium Questions and Answers \(14 July 2017\)](#)
 - 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)
 - [Summary of Applications by Substance & Use; List of Applicants](#)
 - [Announcement of RAC & SEAC Recommendations for Approval](#)
 - [CCST Consortium Questions and Answers \(4 September 2017\)](#)
 - Global Chromates Consortium for Aerospace (GCCA) applications (0096-01, , 0098-01, 0099-01, 0099-02, 0116-01, & 0117-01).
 - [GCCA Consortium Overview](#)
 - [Status Announcement of Authorisation Applications for Chromates with a Sunset date of 21 Sept 2017](#)
 - [Status Announcement of Authorisation Applications for Chromates with a Sunset date of 22 January 2019](#)
- Rolls-Royce is aware that, in some cases, the final decisions for these authorisations were not made by the sunset date. If you use substances containing these chromates, **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 Sheet(s).

If you still use any of the chromates with the September 2017 sunset dates *in the European Economic Area*, 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) Communicate this NTS to sub-tier suppliers as required.

If you have concerns please contact reach.programme@rolls-royce.com.

Suppliers are reminded that NTS 392 gives details of how to deal with unexpected issues.

NTS Category:

Regulatory/Legislation

Authorised by:

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