

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 is a Regulation concerning (Registration, Evaluation, Authorisation and restriction of Chemicals).

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 and the provisions related to the hexavalent chromium Authorisations are the same as for the EEA. These Authorisations are all recognised under UK REACH and EU REACH. As a result of the Northern Ireland (NI) Protocol, in Northern Ireland, EU REACH still applies.

GB and EEA 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.

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

Substance Name	EC No.	CAS No.	Sunset Date	Consortium 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
Sodium dichromate dihydrate	234-190-3	7789-12-0	21 September 2017	CCST, GCCA
Sodium chromate	231-889-5	7775-11-3	21 September 2017	GCCA

Substance Name	EC No.	CAS No.	Sunset Date	Consortium sponsoring A&D Upstream Authorisations
Potassium dichromate	231-906-6	7778-50-9	21 September 2017	CCST, GCCA
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

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:

- 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 recognised by the new regulation because they were finalised under EU REACH prior to the official Brexit date.
- 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).
- 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.

Links to their most recent press releases are below (click link for current status):

- [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
- [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
- [Global Chromates 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.***

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.

- Pentazinc chromate octahydroxide - Indestructible Paint applications ([0121-01](#), [0121-02](#)).
 - Commission Implementing Decision Link
 - Pentazinc chromate octahydroxide Summary of European Decision

To continue using any substances in this group of chromates either by themselves or in formulations, in the EEA, NI or GB please be aware that you need to:

1. 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)

2. 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.

3. 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 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 website](#) 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.

4. Please communicate this NTS to sub-tier suppliers as required.

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

NTS Category:

General Information / Communication

Authorised by:

Ian Bentley
Chief of Engineering Quality and Chemicals Management

Note 1: EU REACH applies in the EU/EEA and Northern Ireland (NI)

Note 2: UK REACH applies in Great Britain (GB) (England, Scotland and Wales)

Table 1 Summary of Aerospace & Defence-related Upstream Authorisations

SVHC	CAS #	Use Description	Applicant	Application Number	REACH Authorisation Number	Sponsoring Consortium
Chromium trioxide	1333-82-0	Formulation of mixtures	LANXESS, Atotech, Boeing Distribution, Inc (Aviall Services Inc), BONDEX, CROMITAL, Elementis Chromium, Enthone	0032-01	REACH/20/18/0 REACH/20/18/1 REACH/20/18/2 REACH/20/18/3 REACH/20/18/4 REACH/20/18/5 REACH/20/18/6	(CTAC)
Chromium trioxide	1333-82-0	Functional Chrome Plating	LANXESS, Atotech, Boeing Distribution, Inc (Aviall Services Inc), BONDEX, CROMITAL., Elementis Chromium, Enthone	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 aeronautics and aerospace industries, unrelated to Functional chrome plating or Functional chrome plating with decorative character	LANXESS, Atotech, Boeing Distribution, Inc (Aviall Services Inc), BONDEX, CROMITAL, Elementis Chromium, 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	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	LANXESS, Atotech, Boeing Distribution, Inc (Aviall Services Inc), BONDEX, CROMITAL, Elementis Chromium, Enthone GmbH	0032-05	REACH/20/18/21 REACH/20/18/22 REACH/20/18/23 REACH/20/18/24 REACH/20/18/25 REACH/20/18/26 REACH/20/18/27	(CTAC)
Chromium trioxide	1333-82-0	Use of chromium trioxide for chemical conversion and slurry coating applications by aerospace companies and their suppliers	Wesco Aircraft EMEA, LTD.	0096-01	REACH/19/29/0	(GCCA)
Dichromium (tris) chromate	24613-89-6	Formulation of mixtures	Henkel AG & Co. KGaA, Henkel Global Supply Chain B.V.	0045-01	REACH/20/1/0 REACH/20/1/1	(CCST)
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)

SVHC	CAS #	Use Description	Applicant	Application Number	REACH Authorisation Number	Sponsoring Consortium
Dichromium (tris) chromate	24613-89-6	Use of dichromium tris(chromate) for chemical conversion coating applications by aerospace and defence companies	Wesco Aircraft EMEA, LTD.	0116-01	REACH/20/10/0	(GCCA)
Pentazinc chromate octahydroxide	49663-84-5	Formulation of mixtures	Boeing Distribution, Inc (Aviall Services Inc), Finalin GmbH	0118-01	REACH/20/11/0 REACH/20/11/1	(CCST)
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 (Aviall Services Inc), Finalin GmbH	0118-02	REACH/20/11/2 REACH/20/11/3	(CCST)
Potassium Dichromate	7778-50-9	Formulation of mixtures	Brenntag UK Ltd	0044-01	REACH/20/3/0	(CCST)
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	Wesco Aircraft EMEA, LTD.	0098-01	REACH/19/31/0	(GCCA)
Potassium hydroxyoctaoxodizincatedichromate	11103-86-9	Formulation of mixtures	PPG Industries (UK), Finalin, PPG Central (UK), PPG Coatings, Boeing Distribution, Inc (Aviall Services Inc)	0047-01	REACH/20/6/0 REACH/20/6/1 REACH/20/6/2 REACH/20/6/3 REACH/20/6/4	(CCST)
Potassium hydroxyoctaoxodizincatedichromate	11103-86-10	Use of potassium hydroxyoctaoxodizincatedichromate in paints, in primer, sealants, and coatings (including as wash primers) (for applications in the aeronautics and aerospace industries,)	PPG Industries (UK), Finalin, PPG Central (UK), PPG Coatings, Boeing Distribution, Inc (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)

SVHC	CAS #	Use Description	Applicant	Application Number	REACH Authorisation Number	Sponsoring Consortium
Sodium chromate	7775-11-3	Formulation of Mixtures of sodium chromate for sealing after anodizing, chemical conversion coating, pickling and etching applications by aerospace companies and their suppliers	Boeing Distribution, Inc (Aviall Services Inc) Wesco Aircraft EMEA, LTD.	0099-01	REACH/19/32/0 REACH/19/32/1	(GCCA)
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 (Aviall Services Inc) Wesco Aircraft EMEA, LTD.	0099-02	REACH/19/32/2 REACH/19/32/3	(GCCA)
Sodium Dichromate	7789-12-0 10588-01-9	Formulation of mixtures	Brenntag UK Ltd, Henkel AG & Co. KGaA, AD International BV	0043-01	REACH/20/5/0 REACH/20/5/1 REACH/20/5/2	(CCST)
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	Boeing Distribution, Inc (Aviall Services Inc) Wesco Aircraft EMEA, LTD.	0097-01	REACH/20/14/0	(GCCA)
Strontium Chromate	7789-06-2	Formulation of mixtures	AKZO Nobel Car Refinishes, Habic, Henkel Global Supply Chain, Indestructible Paint Ltd., Finalin, Mapaero, PPG Central (UK), PPG Industries (UK) Ltd, PPG Coatings SA, Boeing Distribution, Inc (Aviall Services Inc)	0046-01	REACH/20/7/0 REACH/20/7/1 REACH/20/7/2 REACH/20/7/3 REACH/20/7/4 REACH/20/7/5 REACH/20/7/6 REACH/20/7/7 REACH/20/7/8 REACH/20/7/9	(CCST)

SVHC	CAS #	Use Description	Applicant	Application Number	REACH Authorisation Number	Sponsoring Consortium
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, satellites, launchers, engines, and for the maintenance of such constructions.	AKZO Nobel Car Refinishes, Habic, Henkel Global Supply Chain, Indestructible Paint Ltd., Finalin, Mapaero, PPG Central (UK), PPG Industries (UK) Ltd, PPG Coatings SA, Boeing Distribution, Inc (Aviall Services Inc)	0046-02	REACH/20/7/10 REACH/20/7/11 REACH/20/7/12 REACH/20/7/13 REACH/20/7/14 REACH/20/7/15 REACH/20/7/16 REACH/20/7/17 REACH/20/7/18 REACH/20/7/19	(CCST)
Strontium Chromate	7789-06-2	Use of strontium chromate in primers applied by aerospace and defence companies and their associated supply chains.	Wesco; PPG Central (UK); Cytec Engineered Materials Ltd.	0117-01	REACH/20/12/0 REACH/20/12/1 REACH/20/12/2	(GCCA)

Table 2 - Pentazinc chromate octahydroxide

SVHC	CAS #	Use Description	Applicant	Application Number	REACH Authorisation Number
Pentazinc chromate octahydroxide	49663-84-5	Formulation of mixtures	Indestructible Paint Ltd.	0121-01	REACH/19/26/0
Pentazinc chromate octahydroxide	49663-84-5	Use of pentazinc chromate octahydroxide in stoved epoxy primer for corrosion protection of aircraft engine components in aerospace and aeroderivative applications.	Indestructible Paint Ltd.	0121-02	REACH/19/26/1