

22 September 2016

☎ +49-2173-8490-610
☎ +49-173-6217194
Dirk.Wiethoelter@macdermidenthone.com
macdermidenthone.com/industrial

To our valued customers

REACH Authorization of Chromium Trioxide – Status September 2016

Dear Sirs,

ECHA's RAC (Risk Assessment) and SEAC (Socio-Economic Analysis) Committees have recently issued their final opinions. These opinions will now be forwarded to the European Commission for a decision on authorization which is expected in the first semester of 2017 latest.

In their final opinions, RAC and SEAC support the applications for authorization and will recommend that the six uses¹ applied for shall be authorized by the European Commission. According to RAC and SEAC the *overall benefits of continued use of chromium trioxide for these uses outweigh the risks to human health.*

In case there would be unexpected delays at the European Commission stage, companies using chromium trioxide supplied by the 7 CTACSub applicants or their distributors may nevertheless continue to use chromium trioxide beyond the so-called Sunset Date (September 21, 2017), date at which use would normally have to stop.

Once the authorizations will have been issued, any downstream users relying on the authorizations must respect terms and conditions and comply with the requirements in the safety data sheets issued by the authorization holders. Downstream users relying on the authorizations will also have to notify their use to ECHA pursuant to Article 66 REACH.

In addition to actively pursuing their authorizations, the 7 CTACsub applicants are also currently working together with key downstream user industry associations to develop and issue supplemental practical guidance ('Task/Good Practice Sheets') for key workplace situations in which chromium trioxide will be used. These Good Practice Sheets will help downstream users to implement or continue optimal workers protection in line with the authorizations requirements.

¹ Use 1: formulation of mixtures; Use 2: functional chrome plating; Use 3: functional chrome plating with decorative character; Use 4: Surface treatment for applications in the aeronautics and aerospace industries, unrelated to Functional chrome plating or Functional plating with decorative character; Use 5: Surface treatment (except ETP) for applications in various industry sectors namely architectural, automotive, metal manufacturing and finishing, and general engineering; Use 6: Passivation of tin-plated steel (ETP) – not relevant for MacDermid Enthone.





MacDermid Enthone
INDUSTRIAL SOLUTIONS

RAC and SEAC recommend the adoption by the European Commission of the following so-called review periods², outlined in the table in the annex.

For additional information please contact CTACSub's consortium manager uschliessner@jonesday.com, tel. 32-2-6451460.

Mit freundlichem Gruß,

Dirk Wiethölder

MacDermid Enthone Industrial Solutions
Global Product Manager Hard Chrome

² A review period is a deadline in advance of which the applicant must have filed an updated report on the authorization which will allow the European Commission to decide whether the authorized use may continue or not.



Annex: Final opinion and recommended Review Periods of CTACsub Application for Authorization for Chromium Trioxide

| Use No. | Use name* | Proposed review periods by applicants: | Recommended review periods by RAC/SEAC: | Recommended start of updating Review Documents, assuming 2.5 years are required: | Recommended Submission of review documents 18 months before deadline: | expected Deadline for 1 st Review: |
|---------|--|--|---|--|---|---|
| | | (from Sunset date on 21.09.2017) | | | | |
| 1 | Formulation of mixtures | 12 years+ | 7 years | 21.09.2020 | 21.3.2023 | 21.9.2024 |
| 2 | Functional chrome plating (Hard Chrome) | 12 years | 7 years | 21.09.2020 | 21.3.2023 | 21.9.2024 |
| 3 | Functional chrome plating with decorative character incl. Etching of plastics | 7 years | 4 years | 21.09.2017 | 21.3.2020 | 21.9.2021 |
| 4 | Surface treatment for applications in the aeronautics and aerospace industries, unrelated to Functional chrome plating or Functional plating with decorative character | 12 years | 7 years | 21.09.2020 | 21.3.2023 | 21.9.2024 |
| 5 | Surface treatment (except ETP) for applications in various industry sectors namely architectural, automotive, metal manufacturing and finishing, and general engineering | 7 years | 4 years | 21.09.2017 | 21.3.2020 | 21.9.2021 |

