

## ASD Considerations on possible delays for the EU REACH (re)authorisation of Chromates CR(VI) for the Aerospace & Defence sector and call for clear timeline

The Aerospace, Security and Defence Industry Association of Europe (ASD) has been following extremely closely the ongoing assessment of the authorisation process regarding review reports and new applications for authorisation for Cr(VI) for uses within the aerospace & defence sector<sup>1</sup> submitted by the Aerospace & Defence Chromates Re-Authorisation Consortium (ADCR). We would like to use this note to express our concerns regarding the timeline.

Granting an authorisation by 21 September 2024, when the existing/preceding Authorisations expires, is essential.

Any delays in granting the authorisation will lead to significant disruptions in our supply chain. Today, faced with the uncertainty as to whether an authorisation will be granted in time, and what conditions would apply, suppliers are considering making business decisions that would have a significant impact on the aerospace & defence sector. Such a situation would damage an already reduced and overstretched supply chain, which cannot perform effectively with these increasing levels of uncertainty.

These kind of uncertainty is also leading suppliers to consider exiting the market and the closure of chrome surface treatment facilities in the EEA, resulting in shortages of materials and consequent issues with delivering parts and products, with impacts also on the MRO (maintenance, repair, and overhaul) of products in service. Change of suppliers could be needed - as indicated in the flow diagrams guides from ADCR<sup>2</sup> - and could lead to the need to undergo a lengthy process for new qualifications.

Granting an authorisation by 21 September 2024 original deadline for expiry of the existing/preceding Authorisation is therefore absolutely crucial for our sector and to reinforce the health and environment protection within a clearly defined framework that can be enforced by the Authorities.

On 14 June, ADCR provided further information to ECHA in the context of this authorisation file, as requested by the Commission. The Consortium has acted extremely quickly to provide the data well in advance of the deadline to prevent any undue delays. At this time, the sector needs clarity regarding the next steps and the decision timeline. This is key to address our various concerns, avoid any abrupt business decisions and mitigate any supply chain disruptions.

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<sup>1</sup> AfAs: 325\_ADCR\_Anodise\_sealing; 326\_ADCR\_Anodising; 327\_ADCR\_Chemical\_conversion\_coating; 328\_ADCR\_Chromate\_rinsing; 329\_ADCR\_Electroplating; 330\_ADCR\_Finish\_stripping; 331\_ADCR\_Formulation; 332\_ADCR\_Passivation\_metallic\_coatings; 333\_ADCR\_Pre-treatments; 334\_ADCR\_Stainless\_steel\_passivation; 335\_ADCR\_RR\_Anodising; 336\_ADCR\_RR\_Anodise\_sealing; 337\_ADCR\_RR\_Chemical\_conversion\_coating; 338\_ADCR\_RR\_Chromate\_rinsing; 339\_ADCR\_RR\_Electroplating; 340\_ADCR\_RR\_Finish\_stripping; 341\_ADCR\_RR\_Formulation; 342\_ADCR\_RR\_Passivation\_metallic\_coatings; 343\_ADCR\_RR\_Pre-treatments; 344\_ADCR\_RR\_Slurry\_coating; 345\_ADCR\_RR\_Stainless\_steel\_passivation.

<sup>2</sup> [ADCR website](https://www.adcr.org)

Therefore, we call upon the **Commission to clarify the timeline that will ensure the required authorisations are granted before the 21<sup>st</sup> of September.**

In the context of the continued positive dialogue with Authorities, ASD and national trade associations are committed to supporting the Commission and the Member States in finding the best way to secure business continuity within the aerospace & defence sector.

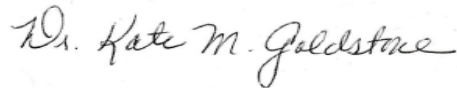
Signed on behalf of ASD



Jan Pie, Secretary General of ASD

Brussels, 24 June 2024

Signed on behalf of ASD Consortium



Dr. Kate Goldstone, Chair of ADCR Consortium

Brussels, 24 June 2024