



● **REACH and
The Aerospace Industry
Articles**

Nel Versoep

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Royal Dutch Airlines



● Guaranteed Authorisations for substances (CCST)

	Strontiumchromaat CAS nr 7789-06-2 16 april 2020	Pentazinc chromate octahydroxide CAS 49663-84-5 30 maart 2020	Dichromium tris (chromate) CAS 24613-89-6 15 april 2020	Potassium dichromate CAS 7778-50-9 5 nov. 2019 1 april 2020	Potassium hydroxyoctaoso dizincate CAS 11103-86-9 15 april 2020	Chromiumtrioxid e CAS 1333-82-0 29 October 2019	Sodiumchromate CAS 7775-11-3 29 October 2019	Sodium dichromate CAS 10588-01-9 14 april 2020
AKZO nobel Car refinishes BV	REACH/20/7/10							
Habich GmbH	REACH/20/7/11							
Henkel AG & Co KGaA			REACH/20/1/2					REACH/20/5/4
Henkel Global Supply Chain BV	REACH/20/7/12		REACH/20/1/3					
Indestructible Paint Ltd	REACH/20/7/13							
Finalin GmbH	REACH/20/7/14	REACH/20/11/3			REACH/20/6/6			
Mapaero	REACH/20/7/15							
PPG Europe BV	REACH/20/7/16				REACH/20/6/7			
PPG Industry UK	REACH/20/7/17				REACH/20/6/5			
PPG Coatings	REACH/20/7/18				REACH/20/6/8			
Avial Services / Boeing Distribution	REACH/20/7/19	REACH/20/11/2			REACH/20/6/9		REACH/19/32/2	
Brenntag UK				REACH/20/3/1				REACH/20/5/3
AD International BV								REACH/20/5/5
Wesco				REACH/19/31/0		REACH/19/29/0	REACH/19/32/3	

● Role: Obligations articles

Obligations for Articles as a:

- Producer => Notification & Communication
- Importer => Notification & Communication
- Supplier => Communication

Notification => ECHA

Communication => Downstreamusers

! Remark:

A company could have still other roles concerning REACH



● What's an Article?

Although the guidance is clear about two parts connected together. It is still difficult to determine what's an article.

For example:

- No discussion concerning one piece like a bolt and nut



- IPA wipes, it's an article carrying with a substance
Probably in a container



- Double sided adhesive tape, article with a integrated substance



● Guidance:

The ECHA provided a helpful scheme:

We have to determine for each part if there is CL substance present on the part (article).
At the moment there are 200 CL substances

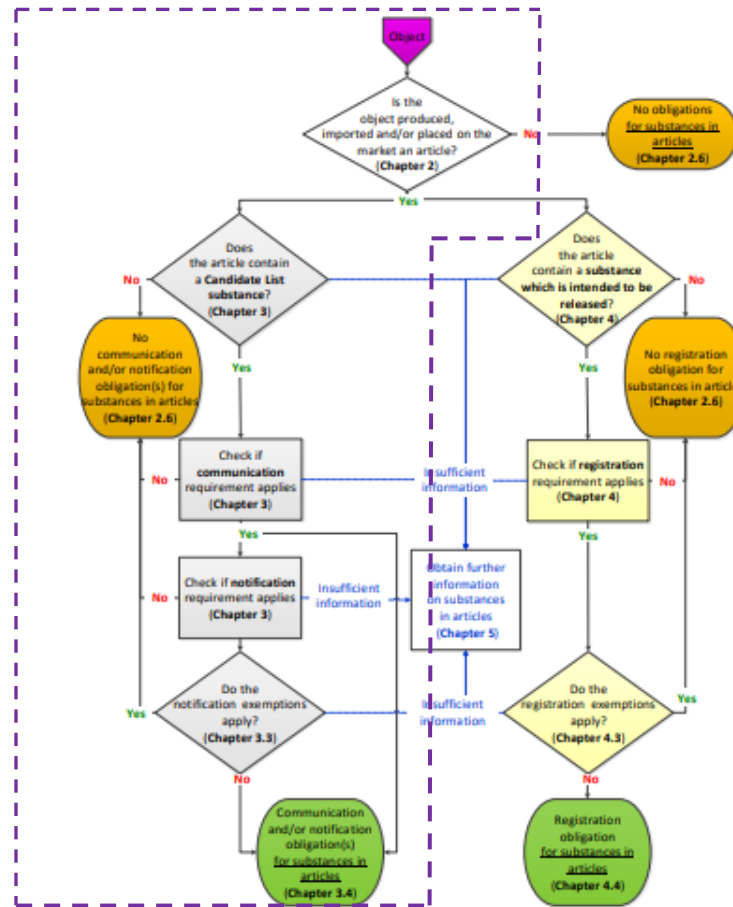


Figure 2: General processes for identifying obligations for substances in articles according to Articles 7 and 33

● Communication in Supply Chain

Communication to recipient for every article :

- The name of CL substance when present above 0.1% (w/w)
- Information on safe use
- Within 45 days

Remark:

- No information on safe use is necessary, when exposure is excluded through all life cycle stages. Only the name of the substance has to be communicated.

● Notification ECHA

- The CL substance name when present $>0.1\%$ (w/w) and
- The total amount > 1 tonne per year per producer / importer
- Description of the use of the substance
- Description of the article and its use

Notification is exempted when:

- Under normal circumstances there is no exposure to humans and or environment.
- Substance is registered for that use.
- If article is produced or imported before substance was included in candidate list

● Calculations & Tonnage notification

The calculations on CL substance present in an article

- Per article
 - The ratio $\text{CL substance (w)} / \text{Cl-substance (w)} + \text{article (w)}$
- Producing a complex article
 - The ratio $\text{CL substance (w)} / \text{Cl-substance (w)} + \text{complex (w)}$

Notification

- If CL substance is $>0.1\%$ (w/w)
- All kg's has to be added up, even multiplied, to determine above 1 tonnage

● Considerations

- As an importer of aircraft and its components, is impossible to fulfill the requirements of REACH article 33.
 - It is not possible to determine all CL-substance per article / complex article.
 - To fulfill this requirements, support of the original equipment manufacturers is necessary
- Request of a maintenance organization:
 - Information on safe “maintenance” should be given
 - If maintenance is performed, should % (w/w) CL-substance recalculated?
 - What if maintenance is performed on a non-EU article, is notification necessary?

- Thank you

<https://echa.europa.eu/nl/regulations/reach/candidate-list-substances-in-articles/communication-in-the-supply-chain>

http://www.iaeg.com/elements/pdf/Materials_Declaration_Process_Overview.pdf

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