

CTAC Consortium

PRESS RELEASE

February 4, 2015

The CTAC Consortium, a group of more than 150 companies formed in 2012 to jointly develop draft applications for REACH authorization of several uses of chromium trioxide, is pleased to announce that it has concluded its works. Chromium trioxide continues to be an essential compound for certain industrial processes and products pursued in the European Union by CTAC Members and their customers. Applications for REACH authorization for these uses of chromium trioxide will therefore be filed with ECHA.

The CTAC Consortium assisted by its consultants ENVIRON UK Ltd. and ENVIRON's partner BiPRO GmbH has developed draft applications for REACH authorization for the following uses of chromium trioxide:

Use No.	Use name ¹	Proposed review period
1	Formulation of mixtures	12 years+
2	Functional chrome plating	12 years
3	Functional chrome plating with decorative character	7 years
4	Surface treatment for applications in the aeronautics and aerospace industries (unrelated to Functional chrome plating or Functional chrome plating with decorative character)	12 years
5	Surface treatment (except ETP) for applications in various industry sectors namely architectural, automotive, metal manufacturing and finishing, and general engineering (unrelated to Functional chrome plating or Functional chrome plating with decorative character)	7 years
8	Passivation of tin-plated steel (ETP)	4 years (bridging)

Companies that are not CTAC Members who wish to file individual applications for REACH authorization for one or several of these uses of chromium trioxide may purchase letters of access for the draft CTAC authorization dossier parts (analysis of alternatives, chemical safety report, socio-economic analysis) to adapt and complement them according to their needs for filing their applications for authorization with ECHA. Letters of access will be available as of February 9, 2015 from the CTAC Consortium Manager Jones Day at www.jonesdayreach.com.

In addition, several Members of CTAC and interested non-CTAC Members that act as importers / Only Representatives / formulators are currently in the process of building² a new follow-up Consortium to jointly file most likely in May 2015 so-called upstream applications for authorization for the uses listed above based on the CTAC authorization dossier parts. Authorizations granted at the upstream level will ease the burden for downstream users who wish to continue using chromium trioxide or chromium trioxide based mixtures without having to obtain their own authorizations. More information on this new so-called CTACSubmission Consortium ('CTACSub') is also available from Jones Day. For further queries, please contact Ursula Schliessner at uschliessner@jonesday.com.

¹ For the detailed use definitions from CTAC Consortium Agreement as last amended December 19, 2014, please see overleaf.

² Deadline for sign-up of interested companies February 20, 2015.

Use Definitions (from Annex 1 of CTAC Consortium Agreement)³

(1) *Formulation of mixtures*

The formulation of chromium-based mixtures in liquid or solid forms using chromium trioxide combined with other chemical substances and/or compounds. The use definition is restricted to formulation for 'placing on the market for...' (e.g. a proprietary coating formulation). This use definition explicitly excludes the subsequent use of the mixtures because these are considered as covered by Uses (2) – (8).

(2) *Functional chrome plating*

An industrial use, meaning the electrochemical treatment of surfaces (typically metal) to deposit metallic chromium using a solution containing chromium trioxide (amongst other chemicals), to enhance wear resistance, tribological properties, anti-stick properties, corrosion resistance in combination with other important functional characteristics. Such secondary functional characteristics are chemical resistance, able to strip, unlimited in thickness, paramagnetic, deposit not toxic or allergic, micro-cracked brightness. Process characteristics are closed loop processing, high speed, flexibility in size, plating of inner surfaces, low process temperature, surface can be machined, assemblability.

Functional chrome plating may include use of chromium trioxide in pre-treatment and surface deposits unlimited in thickness but typically between 2µm and 5000 µm. Functional chrome coatings are widely used in many industry sectors.

(3) *Functional chrome plating with decorative character*

The electrochemical treatment of metal, plastic or composite surfaces to deposit metallic chromium to achieve an improvement in the surface appearance, level of corrosion protection and to enhance durability. In functional plating with decorative character, chromium trioxide is used to deposit a coating of typically 0.1- 2.0 µm, or, where increased corrosion resistance is required, a 'micro cracked' chromium deposit at thicknesses of typically 0.5 - 2.0 µm, over a nickel undercoat. Functional plating with decorative character may include use of chromium trioxide in a series of pre-treatments and surface deposits. Functional plating with decorative character is used widely in automotive, plumbing, household appliances, bathroom, furniture and homeware applications. Functional plating with decorative character includes black chrome plating provided that there is no residual CrVI on the surface of the article at the detection limit,⁴ which has been used, for example, in solar panel manufacture, where deposits are porous and <1 µm in thickness.

(4) *Surface treatment for applications in the **aeronautics and aerospace industries**, unrelated to Functional chrome plating or Functional plating with decorative character*

This Use includes processes that convert the surface of an active metal or coat metal surfaces by forming/incorporating a barrier film of complex chromium compounds that protects the metal from corrosion and provides a base for subsequent treatments such as painting or bonding. This includes integrated process systems where chromium trioxide is used in a series of pre/main/post-treatments. Pre-treatment includes processes such as chemical polishing, stripping, dexodizing, pickling and etching of metals. Main-treatment includes processes such as conversion coatings, passivation and anodizing, deposition and

³ Amended and consolidated version December 19, 2014. Use definitions of Use 6 (catalysts) and Use 7 (laboratory) are not repeated here because no draft authorization dossiers have been developed for these uses.

⁴ EN 15205 is to be used as the standard of detection of chromium VI. If a Member wishes to use another standard, the Member has to prove that it is equally sensitive.

other surface treatments where a chromium trioxide-based solution is used. Post-treatment includes processes such as rinsing, staining and sealing for final surface protection.

- (5) ***Surface treatment (except ETP) for applications in various industry sectors namely architectural, automotive, metal manufacturing and finishing, and general engineering***

This Use includes processes that convert the surface of an active metal or coat metal surfaces by forming/incorporating a barrier film of complex chromium compounds that protects the metal from corrosion, provides a base for subsequent painting, provides a chemical polish, and/or colors the metal. This includes integrated process systems where chromium trioxide is used in a series of pre/main/post-treatments. Pre-treatment includes processes such as chemical polishing, stripping, dexodizing, pickling and etching of metals or other materials. Main-treatment includes processes such as conversion coatings, passivation and anodizing, deposition and other surface treatments where a chromium trioxide-based solution is used. Specifically, this includes continuous coil coating of steel and passivation (e.g. zinc plating, copper foils), but not passivation of tin-plated steel. Post-treatment includes processes such as rinsing, staining and sealing for final surface protection.

- (8) *Passivation of tin-plated steel (ETP)*

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