

## Note for the attention of Tim Bowmer, Chairman of the Committee for Risk Assessment

### Ref: Request to the Committee for Risk Assessment to consider a condition in the opinion on the application for authorisation N° AFA-O-0000006655-67-01

The Committee for Risk Assessment (RAC) is requested to consider the condition recommended by RAC in its opinion on the application for authorisation N° AFA-O-0000006655-67-01, dated 30 November 2017, submitted by Wesco Aircraft EMEA Limited (formerly Haas Group International SCM Ltd) and concerns the "Use of chromium trioxide for chemical conversion and slurry coating applications by aerospace companies and their suppliers".

#### 1. Background

On 20 December 2017, the applicant for authorisation contacted ECHA stating that a condition recommended by RAC in its final opinion has serious consequences for them. The contested condition was not included in the draft opinion but was introduced in the final opinion. The condition limits the activities that can be carried out during the chemical conversion and slurry coating processes. According to the applicant, this additional condition is based on a misunderstanding between RAC and the applicant about the intended scope of the use applied for.

The condition in the opinion of RAC and SEAC is "*Chemical conversion coating by spraying and slurry coating by dipping, brushing, swabbing or roller shall not be covered by the authorisation, if granted*". RAC had introduced this condition due to the lack of sufficiently specific information in the worker contributing scenarios (WCSs), i.e. by legitimate reason of concern for control of workplace exposure.

On 8 February 2018, the applicant submitted an updated Chemical Safety Report (CSR) providing missing information and clarifications to support their view that the CSR intended to cover these processes.

Given the exceptional circumstances, ECHA consulted the services of the European Commission, who confirmed the Agency that they would appreciate that RAC re-consider this condition in order to provide a complete opinion.

#### 2. Terms of Reference

The Committee is requested to consider the clarifications provided by the applicant for authorisation and to conclude if the condition "*The scope of the authorisation for the use of*

*chromium trioxide is limited to slurry coating (sacrificial coating and diffusion coating) and chemical conversion coating operations by aerospace companies and their suppliers. Chemical conversion coating by spraying and slurry coating by dipping, brushing, swabbing or roller shall not be covered by the authorisation, if granted.*" is still necessary. Depending on the conclusion of RAC, the opinion will either be amended or will be left unchanged. ECHA will inform the Commission, the Member States and the applicant accordingly.

### **3. Timescale for the RAC opinion**

RAC is requested to provide its conclusion as soon as possible but latest by 30 June 2018.

### **4. Remuneration**

The task for RAC following from this request is not considered to fulfil any of the requirements of a transfer of funds to the competent authorities of the Member States pursuant to Article 14(1) of Regulation (EC) 340/2008 and therefore no remuneration will be paid by the Agency.

***[Signed]***

Bjorn Hansen  
Executive Director

Cc: Jukka Malm, Jack de Bruijn