

Customer Information

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Ort/ Datum:
Ense, 21.09.2017

REACH Regulation Information on the further use of chromium-VI

Dear Sir or Madam,

The company WIOTEC® Ense GmbH & Co.KG takes its role as a downstream user and the associated obligations and tasks with regard to the European chemicals legislation REACH very seriously. REACH requires an examination of the properties of chemical substances by identifying the health and environmental hazards they pose, and ensures that this information is passed down the supply and consumer chain.

An obligation to provide information in accordance with Article 33 applies to customers if an SVHC is contained in a product in proportions of > 0.1% by weight. This applies regardless of the tonnage.

We comply with this information obligation by obtaining binding information from our suppliers. If this information indicates that our products supplied to you contain SVHCs > 0.1% by weight, we will inform you immediately.

Authorisation according to REACH

SVHCs may be included in Annex XIV of the REACH Regulation. This means that these substances may be used after a given period only with a granted authorisation.

Cr(VI) substances, including chromium trioxide, were included in Annex XIV in April 2013.

The last possibility to submit an authorisation request was the so-called „Latest Application Date“, which occurred on 21 March 2016. Cr-VI substances could be used until the so-called „sunset date“ 21 Sept 2017

Until this date, Cr(VI)-containing products could still be delivered to you. You could also use Cr(VI)-containing products up to this point.

In order to be able to continue using Cr(VI) products beyond the „sunset date“, authorisation was pursued. The necessary applications for authorisation were prepared by various consortia and submitted with the aim of obtaining approval for the further use of Cr(VI).

The European Chemicals Agency (ECHA), based in Helsinki, is responsible for evaluating these applications. There, two committees dealt with the subject of chromium trioxide: the Risk Assessment Committee (RAC) and the Socio-economic Analysis Committee (SEAC). In the meantime, they have recommended that the EU Commission approve six applications. According to their final recommendations, if chromium trioxide is further used in the EU, the risks to human health are significantly lower than the overall benefits of further use. Normally, the EU Commission follows ECHA's recommendations.

However, it was unlikely that the EU Commission would grant this approval before the sunset date. In this case, special regulations apply for the interim periods.

If the EU Commission, as expected, follows the recommendations of the ECHA committees, nothing will change for buyers of chromic acid-based surfaces: You can still obtain chromed surfaces for the approved applications after 21 September 2017 without further restrictions. This pertains to the duration of the specified review period.

It can be assumed that the following time periods will be set for the first review of the approval:

functional chrome plating with decorative character: **four years**

Within this time window, coaters must have implemented a chromium-VI-free alternative technology or have had an application for authorisation extension approved.

Remarks:

1. In the electroplating process, chrome is deposited as a metal and lies on the carrier material (e.g. metal, plastic) as an end surface in neutral form, chromium-0, and is therefore non-toxic. Therefore there is no potential danger for users and consumers.

2. The required properties of this chrome coating are its very good corrosion resistance, abrasion resistance as well as the color stability of this metal, all of which are currently not fully achieved by alternatives.
3. Research is currently being carried out into process-reliable and suitable alternatives that can completely replace a chromium-VI coating.

We would also like to keep you informed about developments that follow from the REACH regulation and concern our processes in the future. Please also note the current information on our website.

Kind Regards

WIOTEC® Ense GmbH & Co.KG

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ZVO and VECCO e.V.

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