

PRESS RELEASE
MARCH 23, 2015

The **CTACSub Consortium** (CTAC Submission Consortium) is pleased to announce that it has started its works.

CTACSub is a group of seven companies that was created on February 20, 2015 to jointly file applications for REACH authorization for specific industrial uses of chromium trioxide. CTACSub will file joint so-called 'upstream' applications for authorization for all uses for which draft applications for authorization (common data sets) were developed by the CTAC Consortium (in turn consisting of 150+ companies). The CTACSub joint application for authorization will be submitted to ECHA in May 2015.

This early (one year before the so-called 'Latest Application Date' on March 21, 2016) joint upstream application is destined to assure the market that the major chromium trioxide (formulation) suppliers are well aware that the industrial use of this substance is essential for a large number of industries and that everything will be done so that the downstream users can continue to use chromium trioxide for their current uses provided adequate operational conditions and risk management measures are met. These current uses covered by the joint application are in addition to formulation of mixtures, functional plating, functional plating with decorative character, miscellaneous surface treatment, and passivation of tin-plated steel (for exact definitions, please see below).

In turn, this also ensures that articles and components manufactured using chromium trioxide can continue to be manufactured in and for the numerous sectors that utilize such articles in today's economy. These sectors include aerospace, architecture, automotive, machinery, packaging, printing and sanitary.

Members of CTACSub are:

- Atotech Deutschland GmbH (formulator)
- Aviall Services Inc. The Netherlands Branch (affiliate of The Boeing Company), (importer of formulations)
- Bondex Trading Ltd. (importer)
- Cromital Spa (OR) (for and affiliate of Soda Sanayii A.S.)
- Elementis Chromium LLP (OR) (for Elementis Chromium Inc.)
- Enthone GmbH (formulator)
- Lanxess Deutschland GmbH (OR) (for Lanxess CISA (Pty) Ltd.) acting as Submitting Applicant for the joint application.

For additional information, please contact the CTACSub Consortium Manager uschliessner@jonesday.com, tel. +32-2-6451460.

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

(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 limit², 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 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)

¹ 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 by CTAC for these uses.

² 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.