Guidelines for users
of chromium trioxide in chemical conversion coatings
for European Space Programmes

Noordwijk, 28.7.2025 Our ref. MPTB-RL-GD-0200

Continued use of chromium trioxide in chemical conversion coatings for space hardware after the REACH authorisation sunset date on 21 September 2017

The purpose of this document, which has been prepared in the frame of the Chromates Space Task Force (STF) of the Materials and Processes Technology Board[1], is to facilitate compliance with the REACH authorisation requirement for the use of chromium trioxide (EC 215-607-8; CAS 1333-82-0) – hereafter "**CrO_3**" or "**the Substance**" – in the European space industry after the Annex XIV Sunset Date on 21.9.2017.

More specifically, this document covers the use of CrO_3 in chromic (or chemical) conversion coating (CCC) and the repair or maintenance of such coating on aluminium alloy parts used in launchers and space vehicles – hereafter "**the Use**". For these applications CrO_3 is contained in certain mixtures sold in or imported into the EU by Henkel AG & Co. KGaA ("**Henkel**") or its EU affiliates. They are known under the following brand names (formerly known as "Alodine"):

- **BONDERITE M-CR 1200 AERO, BONDERITE M-CR 1200S AERO, BONDERITE M-CR 600 AERO[2]**

Info box 1 Summary

Following the publication of updated versions of the relevant Safety Data Sheets (SDSs) by Henkel in the beginning of June 2025 to align with the EU REACH authorisations granted by the European Commission (COM) to members of the **Aerospace and Defence Chromates Re-Authorisation (ADCR) Consortium**, the Use in the European Economic Area (EEA) is continued to be allowed under authorisation number **REACH/24/61/3** pertaining to upstream supplier Cromital S.P.A. according to Commission Implementing Decision of 20.1.2025, ref. C(2025) 94 final. Downstream users (DUs) are advised to check the latest Henkel SDS for their specific products to see whether they have been updated accordingly. If so, **compliance with authorisation decision C(2025) 94 final will be required – including a compliance deadline of 20.1.2026** – and new ECHA notifications should be done according to REACH Article 66(1). This new ADCR-related authorisation thus **replaces the initial 'CTACSub'[3] authorisation** (decision C(2020) 8797 final) **/ application** (ECHA ID 0032-04, after annulment by the Court of Justice of the European Union in Case C-144/21) as legal title for continued use by DUs in the EEA. The new authorisation is **set to be valid until 20 December 2034; however**, the **impact** of the on-going **EU REACH restriction process** for certain chromium (VI) substances, including CrO_3, needs to be monitored closely, as the restriction is aimed to replace the EU REACH authorisation system for these substances as early as from 2028.

[1] The Materials and Processes Technology Board of the European Space Components Coordination (ESCC MPTB) is a partnership between the European Space Agency (ESA), national space agencies, and space industry represented by ASD-Eurospace; it is chaired at present by ESA.

[2] On https://mysds.henkel.com/index.html# the following brand names are also found: BONDERITE M-CR 1200 CHROMATE COATING AERO known as Alodine 1200 SEAU30K, BONDERITE M-CR 1200 S L, BONDERITE M-CR 600 CHROMATE COATING AERO.

[3] **C**hromium **T**rioxide **A**uthorisation **C**onsortium - **Sub**mission Consortium (Chemservice and others).

The questions and answers in this document contain further clarifications of legal requirements and recommended good practice to continue the Use under the REACH authorisation regime and information about EU/ECHA activities to replace the REACH authorisation requirement with a REACH restriction.

1. I am a downstream user (DU) established in the EU of a mixture containing CrO_3 from Henkel. What do I have to do if I want to continue using such mixture containing CrO_3 in the EU/EEA?

As a DU you have a duty to ensure compliance with the REACH authorisation requirement for the Use of CrO_3 (as part of a mixture), **based on the latest available Safety Data Sheet**. Following a supplier switch away from CTACSub initiated in 2024, Henkel is now relying on the ADCR-related authorisation decision C(2025) 94 final of 20.1.2025 (also summarised in Table 1 below). Consequently – **provided that Henkel's SDS you receive for the mixture now refers to the ADCR-related authorisation number REACH/24/61/3 pertaining to Cromital S.P.A.**[4] – you have to ensure coverage by this new authorisation as follows:

i. **Identify the authorised use and number** by which you need to be covered: With regard to the Use in question this is – according to Commission Implementing Decision of 20.1.2025, ref. C(2025) 94 final: *Use of chromium trioxide in chemical conversion coating in aerospace*[5] *and defence industry and its supply chains*.

ii. **Comply with** the **operational conditions** and **risk management measures** for the Use described in the Chemical Safety Report (CSR) of the applicable (ADCR) application for authorisation (AfA): These should be included in updated **Exposure Scenarios (Annex to Safety Data Sheet/SDS)** made available by the supplier; Henkel is publishing SDSs at https://mysds.henkel.com/index.html. At the time of writing this document, the ADCR EEA Exposure Scenario for Chromium Trioxide in different languages can be found directly on the ADCR website ADCR Guidance and Support. ADCR EEA Exposure Scenario **ES5** '*Use of chromium trioxide in **chemical conversion coating** in aerospace and defence industry and its supply chains*' is the applicable exposure scenario for the Use.

iii. Comply with the **monitoring arrangements and other conditions in the applicable authorisation decision (C(2025) 94 final)**, which are also referred in Henkel's updated SDS under Section 15 'Regulatory information'. Please note that the compliance deadline defined for certain obligations is **20 January 2026**.

iv. **Notify ECHA according to REACH Article 66** about the authorised use (see also question 2).

DUs are generally advised to follow any customer communication, the latest update of the SDS and Label by Henkel and in case of doubts or questions reach out to their Henkel Sales Representative or Authorised Distributor.

Table 1 Summary of ADCR-related decision C(2025) 94 final authorising the use of chromium trioxide in CCC

ECHA ID for AfA	Applicant/ authorisation holder*	Authorisation number*	COM decision reference and full text link	Summary publication in the EU OJ	End of the 12-month period for some conditions
0337-02	here: Cromital S.P.A.	REACH/24/61/3	C(2025) 94 of 20.1.2025 (LINK)	C/2025/418 of 27.1.2025 (LINK)	20.1.2026

[4] In the previous Issue 7 of this document reference was made to Haas Group International sp. z. o.o. and its authorisation number REACH/24/61/0 – this is no longer applicable.

[5] The term 'aerospace' also includes the 'space' industry as a sub-sector, for all applications in these guidelines.

*Only mentioning the relevant entity and number for the Use.

Table 2 below provides a summary of conditions set out in the ADCR authorisation decisions, including the one referred in Table 1 above.[6] They result from a direct application of the principles of Health, Safety and Environment (HSE) risk prevention and continuous improvement of control methods. The objective is to limit exposure levels and emissions to the lowest levels technically and practically possible.

Table 2 Summary of ADCR authorisation conditions (Source: ASD)

See decisions *(English version only)* * RPE: Respiratory Protective Equipment * LEV: Local Exhaust Ventilation		**Analysis**	**Comments**
1. Use of LEV*	**Monitoring arrangements** for workers and environment	**Already mandatory under the previous authorisations for CrVI** or through other regulations such as the CMR Directive (2004/37/CEEC)	**The impact depends on the current level of compliance of the site.** In particular, it should be noted that: - HSE data: annual monitoring campaigns are still required, reporting to ECHA is no longer required but monitoring must be available to authorities on request. - Facial fit test: already required in the previous authorisations, but the application must now be controlled
2. Use of appropriate RPE*	**Face fit test + Fit check of seal of the RPE***		
3. Substitution documentation			
4. Technical improvement of Operational Conditions (OCs) & Risk Management Measures (RMMs)		**Already mandatory** To be implemented without delay and at the latest by DATE given per decision	**HSE prevention principle,** involving continuous improvement of working methods. Little or no impact if the company is already compliant or if an improvement process is in place.
5. Feasibility Study on additional specified technical improvements that could be made to ways of working		**Extension of the previous requirement relating to the technical improvements** To be implemented without delay and at the latest by DATE given per decision	Feasibility studies may not be required if sites already have the measures concerned in place, the results of any required **technical and economic feasibility studies** should determine any improvements to be made, if indicated as feasible by the studies.

The breakdown of requirements (technical improvements and feasibility study) to an individual surface treatment site requires a case-by-case analysis, taking into account the different processes implemented on the lines and the technical and organisational measures already in place.[7]

For further details about ADCR decision compliance, DUs are advised to consult the ADCR website at https://www.adcr-consortium.eu and sign up to the ADCR Contact Network at https://www.adcr-consortium.eu/support-the-adcr (see also interesting links under question 8 below). In addition, Appendix 2 to this document contains a comparison of ADCR authorisation decisions under EU REACH vs. UK REACH for the use of chromium trioxide in CCC in aerospace and defence industry and its supply chains.

[6] The same types of requirements apply to all ADCR authorisations granted to date under EU REACH, even if certain conditions may vary slightly depending on the process concerned.
[7] See ASD note on ADCR outcome of 14.2.2025, link, page 3.

1a. There is another ADCR-related authorisation number REACH/24/48/2 pertaining to Henkel Global Supply Chain B.V. for the same use (CCC). Is this number relevant as well?

No. Henkel have confirmed that the authorisation number for CCC indeed is only REACH/24/61/3, Henkel will not use their own one (which is based on Commission Implementing Decision of 28.10.2024, ref. C(2024) 7408 final) but use material with that one number going back to the Cromital authorisation. Therefore, the earlier compliance deadline of 28 October 2025 in that earlier authorisation decision does not apply.

2. As a DU established in the EEA, when do I need to submit a REACH Article 66 notification to ECHA?

Downstream users using a substance in accordance with the conditions of an authorisation granted to an actor up his supply chain for that use shall notify the European Chemicals Agency (ECHA) **within three (3) months of the first supply of the substance** (see REACH Art. 66(1) and 56(2)). This obligation applies after the authorisation decision has been published in the EU Official Journal (OJ).[8]

In practice this means for the present case:

In relation to the ADCR-related authorisation (Table 1 above), DUs are advised to notify without undue delay after the applicable authorisation number has been communicated to them (e.g. in the updated Henkel SDS, on the CLP label or in another way by Henkel), within 3 months of the first supply of the substance (as part of the mixture) to them after the publication in the OJ (see Table 1).

Further information about EU REACH Article 66 notifications can be found in **Appendix 1**.

3. What kind of documentation should a DU keep in place to show authorisation compliance and for possible enforcement purposes?

The control of compliance with authorisation decisions falls within the **competence of local authorities** in the Member States. All documents must therefore be made available to them on request.

The following documents are recommended as a minimum, as part of an internal documentation system:

i. **The present document**, especially with reference to question 1 and 2 above;
ii. **Latest version of the (extended) REACH safety data sheet for the mixture**; Henkel SDSs can be found on the Henkel website at https://mysds.henkel.com/index.html[9]; the ADCR Exposure Scenarios can already be found on the ADCR website, including for chromium trioxide 'CT_eSDS_April_2025', ES5 – Use of chromium trioxide in chemical conversion coating, page 88-108.
iii. **Evidence of REACH Article 66 notification to ECHA and timely compliance with the ADCR authorisation conditions** (see above Table 1 and Table 2)**. The entire process must be documented and reviewed annually** (measurement results, new technical measures, changes in operational conditions, etc.) in order to demonstrate that exposures and emissions are

[8] See https://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorised-use.
[9] If a product is not displayed on the Henkel website, the customers nevertheless get SDS and Annex via an automated mail (e-mail or paper depending on the contact details).

controlled over time and gradually reduced when necessary. The progress of the substitution plan must also be documented.[10]

Please note that in addition to REACH, compliance with national legislation on Occupational Safety & Health (OSH) also needs to be ensured. The following **EU Binding Occupational Exposure Limit (BOEL) value** applies, subject to due national transposition:

- 5 µg/m³ after 17.1.2025 (Directive (EU) 2017/2398 amending Directive 2004/37/EC).

3a. I am using up existing stock of Bonderite until the end of 2025 for which a SDS identifying the CTACSub-related authorisation number REACH/20/18/17 was previously received. May I keep on relying on the (again pending) CTACSub application for authorisation for the use of this stock?

Yes you may, as you can show based on the SDS received at the time of supply that the raw material supplier was a CTACSub applicant / authorisation holder. Also, the use will cease before the ADCR compliance deadline of 20.1.2026 for certain conditions in this case. Hence, for such use, you have to continue ensuring coverage with the (again pending) CTACSub AfA according to ECHA ID 0032-04 as previously advised, notably by complying with the operational conditions and risk management measures for the Use in the Chemical Safety Report (CSR) of the CTACSub AfA; these should have been included in updated Exposure Scenarios (Annex to SDS) made available by the supplier. REACH Article 66 notifications are no longer required nor possible in this case. However, please note that the CTACSub AfA is expected to be eventually refused by the Commission, in response to CJEU judgment of 20.4.2023 in Case C-144/21 (link to judgment); the timeline for this new decision is not yet defined.

4. What is the CTACSub2 Consortium and can it be relevant to grant a future title for the continued use of mixtures containing CrO_3 in the EU/EEA for CCC to potentially cover DUs in the European Space Sector and their subcontractors?

CTACSub2 is a sub-group consisting of five member companies of the original CTACSub Consortium, they have filed AfAs for 12 uses of CrO_3, including for CCC:

ECHA ID	Applicant	Name of use applied for
0364-08	Chemservice GmbH in its legal capacity as Only Representative of Brother CISA (Pty) Ltd.; ChromeLog OÜ [name of the applicant in the original application: "Prospere Chemical Logistic OÜ as Only Representative of Aktyubinsk Chromium Chemicals Plant, Kazakhstan" updated due to a change of corporate name]; CROMITAL S.P.A. in its legal capacity as Only Representative of Türkiye Şişe ve Cam Fabrikaları A.S.; Polychrome Holding B.V. as Only Representative of American Chrome & Chemicals Inc; MacDermid Enthone GmbH	Chromium trioxide-based main treatment covering chemical conversion coating (CCC) (also referred to as chromating, chromate conversion and alodining) and passivation (of stainless steel) of components applied in the aeronautics and aerospace industries

Unlike in case of ADCR which may cover also DUs outside the consortium, **only DUs who formally signed up to CTACSub2 are aimed to be covered**. They are listed by their name in the public version of the AfA, see for ECHA ID 0364-08 in *Analysis of Alternatives and Socio-Economic Analysis – Public Version, February 2024, Appendix A. List of legal entities covered by Use 8, p. 138, link*. More details can be found in the CTACSub2 press release of 27.2.2024, available here.

[10] See ASD note on ADCR outcome of 14.2.2025, link, page 3.

The Commission decision on the CTACSub2 AfAs is currently expected in the course of 2025.[11]

*Henkel have informed that they have also signed up to CTACSub2 and the aerospace uses covered by the AfA will be valid for Henkel too, but **for Henkel's Aerospace branded products they will not use the supply chain of CTACSub2**, they will use a supply chain having submitted review reports under ADCR (see above Table 1, Cromital S.P.A.). CTACSub2 will still be relevant for Henkel's non-Aerospace business.*

5. What do DUs located in Great Britain (GB) have to do, if they wish to continue the Use?

The EU REACH Regulation has ceased to apply in Great Britain 'GB' (comprising England, Scotland and Wales[12]) at the end of 2021. Instead, a separate but mostly similar UK REACH regime now applies to entities located in GB.

Unlike under EU REACH, following the annulment of the CTACSub authorisation in the EU the corresponding use in GB should no longer take place under the CTACSub AfA (see ADCR applicant changes flow diagrams – GB T1 submissions 25032025, p4 regarding conversion coating).

However, ADCR has obtained new authorisations for chromate uses in GB as well; more specifically Henkel Ltd has obtained an authorisation under ADCR for the *use of chromium trioxide in chemical conversion coating in aerospace and defence industry and its supply chains* which is summarised in Table 3 below.

Table 3 Summary of ADCR authorisation granted to Henkel Ltd for the use of chromium trioxide in CCC

Application Ref (HSE):	Applicant/ authorisation holder*	Authorisation number*	Decision reference and full text link	Decision publication date	Validity
AfA032-01	Henkel Ltd	UKREACH/24/15/5	UK REACH authorisation for ADCR Consortium (conversion coating) (LINK)	23.9.2024 (LINK)	Valid from 5.9.2024 Expiry 5.9.2036

*Only mentioning the relevant entity and number for the Use.

Appendix 2 to this document contains a comparison of ADCR authorisation decisions under EU REACH vs. UK REACH for the use of chromium trioxide in chemical conversion coating in aerospace and defence industry and its supply chains:

- Like under EU REACH, DUs in GB have to adhere to the operational conditions (OCs) and risk management measures (RMMs) in the Chemical Safety Report part of the application, as described in section 9 (exposure assessment) and 10 (risk characterization related to combined exposure); these should be transmitted as part of the extended Safety Data Sheet.
- However, unlike under EU REACH (see Table 2 above), the UK Authorisation decision does not foresee additional conditions and monitoring arrangements for DUs, but only a reference to the legal requirement in Art. 60(10) of UK REACH to ensure that exposure is reduced to as low a level as is technically and practically feasible.

[11] See https://jonesdayreach.com/wp-content/uploads/CTACSub-Consortium-Questions-and-Answers-Draft-Revision-03_12_2024.pdf, Question 3, page 3.
[12] Please note that EU REACH still continues to apply in Northern Ireland.

GB-based DUs of a UK REACH authorisation granted to an upstream applicant have to submit a **UK REACH Article 66 notification** to the **Health and Safety Executive (HSE)** by email to ukreach.authorisation@hse.gov.uk after the authorisation decision has been published and within three (3) months of the substance being received thereafter. Further information is available at https://www.hse.gov.uk/reach/authorisation-downstream.htm.

Additionally, use of chromates must comply with other regulations including national health and safety laws e.g., COSHH in the UK, adherence to Workplace Exposure Limits (WELs) or Occupational Exposure Limits (OELs) and follow good practice (see ADCR FAQ, p16).

For further information about the right to continue your use for space applications in GB following on the original CTACSub EU application for authorisation you are advised to contact your supplier and/or the ADCR Consortium: https://www.adcr-consortium.eu (see also ADCR FAQ of 25 March 2025, questions 25 et seqq., available here). You may also contact the HSE at ukreach.clp@hse.gov.uk.

5a. What do DUs located in Switzerland have to do, if they wish to continue the Use?

Chromium trioxide is included in the Swiss Authorisation List which is contained in **Annex 1.17 No. 5 (Entry # 16) of the Chemical Risk Reduction Ordinance (ORRChem)**, available HERE. However, **exemptions** from the authorisation requirement (called "prohibition" here) apply in cases where (point a.) **EU REACH authorisations have been granted by the European Commission** and the substance is placed on the market and used in accordance with the EU authorisation; or (point b.) to those uses of the substance in question for which **an application for authorisation has been made**, within the deadline set, in accordance with Article 62 of EU REACH, on which **a decision has not yet been taken** – see Annex 1.17 Number 2 Paragraph 2 of the ORRChem.

With regard to Henkel's Safety Data Sheet updates to align with granted ADCR authorisations, point a. (here: given ADCR-related authorisations granted for chemical conversion coating using chromium trioxide, see Table 1 above) would apply as the basis for the exemption in your case.

You should not need to be required to submit a request for authorisation for your use under Swiss law since the case has been dealt with under the EU REACH authorisation regime. However, companies relying on this exemption are advised to assess the need for **reporting to the Swiss Notification Authority** pursuant to Number 3 Paragraph 1 of Annex 1.17 ORRChem.

The aforementioned only applies if the end use in Switzerland is surface treatment using Alodine 1200 (i.e. use as a chemical). No authorisation requirement in Switzerland would apply in the first place if the question was about space hardware previously treated with Alodine 1200 outside of Switzerland (see also question 6 below).

Regarding the intended transfer of Cr(VI) substances from authorisation to restrictions under EU REACH (see question 7 below) the Swiss Federal Office for the Environment FOEN has informed (22.4.2025) that it will request the Federal Council in due course to amend the Swiss chemical legislation accordingly.

6. What are the obligations for already surface-treated hardware (articles or assemblies thereof/complex objects) related to REACH?

The authorisation requirement does **not** apply. However, according to REACH Art. 33(1) EU suppliers of articles[13] containing a substance included in the REACH Candidate List (e.g. chromium trioxide or chromic acid)[14] above 0.1 % w/w in relation to the coated object (component article[15] or complex object, as the case may be) shall provide EU customers with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance. MPTB members have jointly prepared a REACH Article 33 declaration template; the latest version is available on the ESCIES page.[16]

In addition, as from 5.1.2021 EU suppliers of articles should also provide (notify) the information pursuant to REACH Article 33(1) to ECHA, for its new database on Substance of Concern In products, as such or in complex objects (Products) – "**SCIP**"; the SCIP Database is now published on the ECHA website[17]. This "SCIP notification" requirement stems from Art. 9(1)(i) of the revised Waste Framework Directive (WFD) 2008/98/EC and required transposition into the national laws of the EU Member States by 5 July 2020. A dedicated Space Task Force has elaborated SCIP notification compliance guidelines for space products; the latest version is also available on the ESCIES page.[18]

6a. What are the obligations for local mechanical post-treatment of an already coated component after the CCC process (e.g., Bonderite-M1200 'Alodine' application), where some Cr(VI) content below 0.1 % w/w remains and the post-treatment itself is free of Cr(VI) (Surtec)?

Such a processing of a component (article/complex object) is not subject to REACH authorisation nor REACH Art. 33 or SCIP reporting. It is the responsibility of Occupational Safety and Health (OSH) to assess how the specific post-treatment is to be carried out in compliance with applicable OSH regulations.

7. ECHA is currently preparing a restriction proposal for certain Cr(VI) substances, including CrO_3 with the aim to eventually replace the REACH authorisation requirement for these substances. How can I prepare for this transition?

COM has requested ECHA in September 2023 to prepare a REACH restriction dossier for certain Cr(VI) substances, including CrO_3. This request has been made because the number of AfAs for the use of these substances, especially CrO_3, has far exceeded COM's and ECHA's predictions. The approach envisaged for regulating Cr(VI) substances (authorisation) is no longer considered appropriate to control the risk to human health posed by these substances.

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[13] Space hardware typically qualifies as assemblies of articles ("complex objects").
[14] https://echa.europa.eu/candidate-list-table.
[15] According to the judgement of the European Court of Justice of 10 September 2015 in case C-106/14 the 0.1 % w/w threshold for complex products for the application of REACH Article 33 should be calculated with reference to each component article contained in a complex product (assembly) as supplied to the EU customer ("once an article, always an article" principle).
[16] https://escies.org/webdocument/showArticle?id=1049&groupid=6 under "Other REACH-relevant material".
[17] https://echa.europa.eu/scip-database.
[18] https://escies.org/webdocument/showArticle?id=1049&groupid=6 under "Waste Framework Directive – SCIP Task Force".

The ECHA restriction proposal has been published by ECHA on 29 April 2025 and the 6-month stakeholder consultation on it opened on 18 June 2025.[19] The proposal foresees a ban on certain Cr(VI) substances, however with a number of wider **derogations including for surface treatments such as CCC**, which would be subject to **specific scientific limit values** for worker exposure and emissions of Cr(VI) to the environment, to be complied with by users. The ECHA proposal could lead to the adoption of a new restriction by COM taking effect around 2028, which would eventually replace the REACH authorisation system for these chromates.[20] In this regard COM has also noted that derogations from such a restriction may not necessarily reflect granted authorisations in terms of timing and/or scope.[21]

DUs interested in continuing use of Cr(VI) substances, including CrO_3, after 2026/7 are advised to follow the ECHA restriction process and evaluate their active participation, including in public consultations on the ECHA website. For the European space community regular updates will be provided via the MPTB and STF. The ECHA restriction process is specifically tracked in the registry of restriction intentions: HERE.

As long as the restriction process is still on-going and the Cr(VI) substances are not removed from Annex XIV of REACH (the Authorisation List), they remain subject to the REACH authorisation process.

8. Where can I turn for further information concerning this issue?

Industry actors:

- **Your CrO_3 supplier (Henkel Sales Representative or Authorised Supplier)**
- **ADCR**: Please see https://www.adcr-consortium.eu, in particular:
  - Summary of granted ADCR Authorisations in EU and GB/UK: Available HERE
  - ADCR Guidance and support: Available HERE
  - Webinars: Available HERE
  - Sign up to the ADCR Contact Network: Available HERE
- **ASD**: https://www.asd-europe.org/news-media/news-events/news/eu-grants-12-year-authorisation-for-chromates/ and ASD Note on ADCR outcome of 14.2.2025
- **CTACSub2**: Please check on www.jonesdayreach.com for any press releases and recommendations

Authorities

- **National REACH helpdesk or ECHA**
- **European Commission**: GROW-F1@ec.europa.eu. *"Q&A – REACH and Chromium(VI) substances"* (last updated on 2.5.2025) can be found at https://single-market-economy.ec.europa.eu/sectors/chemicals/reach/authorisation_en
- **Health and Safety Executive (HSE)** for UK REACH: Contact at ukreach.clp@hse.gov.uk

[19] https://echa.europa.eu/de/registry-of-restriction-intentions/-/dislist/details/0b0236e18971243a.
[20] European Commission information in its Questions & Answers – Towards a Restriction of Cr(VI) Substances under REACH, Version 2, 2.5.2025, available here.
[21] European Commission, previous footnote, p.3, question 5.

ESA REACH Officer

- For remaining questions you may contact Premysl Janik (ESA, reach.officer@esa.int).

9. Appendices

Appendix 1 – Questions and answers on REACH Article 66 downstream user notifications

Appendix 2 – Comparison of ADCR authorisation decisions under EU REACH vs. UK REACH

For the Materials and Processes Technology Board

P. Janik (ESA), Chairman of the MPTB

Disclaimer
The information in this letter reflects the opinion of members of the Materials and Process Technology Board (MPTB) / Space Chromates Task Force (STF) from space industry, national space agencies, and ESA. It is not considered a comprehensive treatment of the subject matter nor a requirement, and any action to the described issue is subject to project or programme decision. The information is intended for guidance only and whilst it is provided in utmost good faith and has been based on the best information currently available and adequate technical standards, is to be relied upon at the user's own risk. No representations or warranties are made with regards to its completeness, or accuracy and no liability will be accepted by the MPTB / STF nor any organisation participating in the MPTB / STF for damages of any nature whatsoever resulting from the use of or reliance on the information.

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Issue 5 ref. MPTB-ESA-MO-0126 of 2023-07-27
Issue 6 ref. MPTB-RL-MO-0157 of 2024-08-22
Issue 7 ref. MPTB-RL-MO-0186 of 2025-05-08
Issue 8 ref. MPTB-RL-GD-0200 of 2025-07-28 – current, *especially taking into account*:

- *Clarification of document type 'Guidelines' in the document header (p1)*
- *Update of SDSs by Henkel for formulations formerly known as "Alodine", in order to align with granted ADCR authorisation number REACH/24/61/3 to raw material supplier Cromital S.P.A. as the new authorisation title for CrO_3/CCC: See in particular Info box 1 Summary, question 1, revised Table 1, clarified compliance deadline of 20.1.2026 for some authorsation conditions*
- *Clarified in a new question 1a, that the ADCR-related authorisation number REACH/24/48/2 pertaining to Henkel Global Supply Chain B.V. for the same use (CCC) is not relevant.*
- *Added a new question 3a regarding continued use of existing stock based on CTACSub-related authorisation number REACH/20/18/17*
- *(Otherwise) removed references to compliance recommendations with CTACSub/Application for Authorisation, such as previous question 2 regarding CTACSub "Good Practice Sheets (GPS)"*
- *Question 4: Updated list of CTACSub2 applicants for ECHA ID 0364-08*
- *Updated some links to ADCR website and Commission FAQ (latest versions of 2.5.2025).*
- *Question 5a regarding Switzerland updated to align with change of EU REACH authorisation title to REACH/24/61/3*
- *Question 7 regarding Cr(VI) restriction proposal: Included reference to ECHA public consultation since 18.6.2025*
- *Appendix 1: Added reference to new EU-wide enforcement project REF-15 in question 7*
- *Appendix 2: Added the Cromital authorisation (C(2025) 94) in the comparison table instead of the Henkel authorisation (C(2024) 7408)*

Appendix 1: Questions and answers on REACH Article 66 downstream user notifications

REACH Article 66 imposes a notification requirement to the European Chemicals Agency (ECHA) for a EU/EEA downstream user (DU) of a substance included on the REACH authorisation list (Annex XIV), which the DU uses in accordance with an authorisation granted to its upstream supplier for that use (authorised use). These notifications are an important compliance requirement for DUs of substances covered by a valid upstream application for authorisation (upstream AfA), such as for chromium trioxide and other chromates. Many SMEs need to deal with ECHA for the first time.

The following Q&As aim to address key questions for DUs to support your EU REACH Article 66 and authorisation compliance at large.

1. Who needs to notify under REACH Article 66?

If you are a **downstream user** who continues to **use** an Annex XIV substance – as such or in a mixture – after its 'sunset date', based on a valid authorisation granted up your supply chain, you are required to notify your authorised use(s). The obligation applies to each **EU/EEA** legal entity using the substance (*including e.g. surface treatment subcontractors, subsidiaries of a group of companies*).

On the other hand, the following companies do **not** need to notify:

- DUs that have obtained their own authorisation for their own use(s);
- Distributors that only store and sell the substance;
- Suppliers of articles containing an Annex XIV substance as an integral part. Hence, suppliers and users of already surface-treated hardware do not need to notify. However, the use of an Annex XIV substance for article production (e.g. surface treatment) typically is a use subject to authorisation and Article 66 notification;
- DUs that are covered by an exemption from authorisation for their use (e.g. use for Scientific Research and Development as defined in REACH Art. 3(23)).

2. When is the notification due?

The submission of an Article 66 notification can only be done once the corresponding upstream AfA has been granted by the European Commission and the REACH **authorisation number** is available to the DU.

Once the authorisation is granted, you shall notify ECHA "**within three months** of the first supply of the substance".[22] As the legal text is not very clear in this regard, the DU is practically advised to notify ECHA within 3 months after the applicable authorisation decision summary has been published in the EU Official Journal.

[22] Wording of the legal text, see REACH Art. 66(1).

3. What information needs to be notified, and how do I obtain it?

The following table provides an overview of the information that must or may be included in an Article 66 notification, and how you can typically obtain it:

Data	Requirement	Source to obtain
Company name, site address(es), contact details	Mandatory	Internal
Authorisation number (identifies the substance, authorised use and authorisation holder)	Mandatory[23]	Supplier / his SDS; Label of substance / mixture (REACH Art. 65); Authorisation decision
Typical annual volume	Voluntary	Internal
Number of staff using the substance	Voluntary	Internal
Brief additional description about your use (e.g. the type of products or their sector of use)	Voluntary	Internal
Any involvement in potential substitution activities	Voluntary	Internal

4. How do I submit a notification?

You must have an active **REACH-IT** account to be able to submit your notification.

- ✓ Sign up in REACH-IT at https://reach-it.echa.europa.eu/reach
- ✓ Log into REACH-IT and from the Menu select 'Downstream user notification of authorised uses'
- ✓ Start filing via 'Prepare and submit online in REACH-IT'

You may also check ECHA's *Video tutorial on how to submit a downstream user notification*.

5. Can a notification be updated?

Yes, at any time. Even more, you should keep the information in your notification up to date, including any confidentiality claims and the justification for these. The notification status may be set as active or inactive (substituted/ceased use); the stated reason of inactivation will always be made public.

6. What are the costs for a notification?

There is no ECHA fee. However, if you wish to contract an external service provider to help you prepare and submit a notification, a service charge to be agreed with the service provider will apply. Also you should consider internal costs to prepare notifications, e.g. for human resources and carrying out any required measurements.

[23] The Article 66 notification template provides a drop-down list of all authorisation numbers from which you must choose.

7. What happens if a DU does not submit the notification?

In this case national enforcement authorities may take action against the DU. This may range from the imposition of fines to a ban on the use of the substance until the notification is made. The enforcement approach and type of sanctions are Member State specific. According to an EU-wide enforcement project on REACH authorisation ("REF-9") carried out in 2022, inspectors identified a **non-compliance rate of 20 % with REACH Article 66 duties**.[24] Another EU-wide enforcement project on workplace safety ("REF-15") from 2026-2028 is also planned to include checks for compliance with authorisations with conditions for workplace, as is the case for Cr(VI) substances.

8. How will ECHA use the notified information?

ECHA maintains a register of Article 66 notifications and forwards them to the **relevant authorities in EU Member States**. Furthermore, ECHA shares non-confidential information from the notifications with the **public** on its website at https://echa.europa.eu/du-66-notifications[25] and specific anonymised information with the (upstream) **authorisation holders (AH)**.

The following Figure 1[26] provides an overview of the different disclosure levels for notification data. As shown in the figure, the DU notifier may **flag certain data as confidential**, in order for them not to be published. This requires a valid justification and applies to company name, location of the site, name of the notified use, and – if notified - brief additional description of use and information on substitution activities.

	Information published (Y / N / claims-dependent)		Information shared with AH (Y / N)	
Company info	Company name		Company name	
	Country of site		Country of site	
	Address of site		Address of site	
	Contact		Contact	
Substance info	Substance name			
Use info	Use name			
	[Quantity - precise value/range]	[- band]	[Quantity - precise value/range]	[- band]
	[Number of staff - precise value/range]	[- aggregate]	[Number of staff]	
	[Brief additional description of use]		[Brief additional description of use]	
	[Involvement in substitution activities]		[Involvement in substitution activities]	
	Data attached as required by decision		Data attached as required by decision	
Supplier	Authorisation holder (upstream supplier)			
Status	Current status (active/inactive) and inactivation reason		Current status (active/inactive)	

Figure 1: Notification information made available by ECHA (left column: information published; right column: information shared with the authorisation holder)

Note: Fields in square brackets are optional and therefore are not be present for all notifications. Similarly, requirements for submission of specific data on exposure or alternatives (uploaded as attachments) do not apply for all authorisation decisions.

[24] https://echa.europa.eu/documents/10162/17088/project_report_ref-9_en.pdf.
[25] ECHA publishes / updates the information.
[26] Source: ECHA, Downstream user notifications of authorised uses: Information made public by ECHA (July 2018).

ECHA's Scientific Committees will also use the information gathered from the DU notifications during the evaluation of review reports of the AH.[27]

9. As a DU of an Annex XIV substance, do I have any other duties under REACH after adoption of the upstream authorisation, apart from EU REACH Article 66 notification?

Yes! Importantly, you need to ensure that your continued use of the substance is in accordance with:

- use authorised to your upstream supplier;
- the conditions and monitoring arrangements set out in the authorisation decision granted to the upstream supplier for this use;
- the supplier's **'extended' SDS**, as updated after the authorisation, including use conditions and risk management measures in the exposure scenarios;
- any further 'safe use' recommendations by the upstream applicants.

Given the complexity of ensuring compliance as a DU with upstream authorisations, you are advised to elaborate an **action plan with timelines / deadlines** for your affected substances and uses. For the action plan, you are also advised to take into account other relevant requirements than REACH, such as the legislation on health & safety at the workplace.

[*Continues on next page*]

[27] See ECHA Q&A 1366 dd. 21/08/2017, available at https://echa.europa.eu/support/qas-support/qas.

10. Where can I find further information for help in my specific case?

- ECHA website: https://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorised-use
- For ADCR: https://www.adcr-consortium.eu/adcr-guidance-and-support.
- REACHLaw Ltd. (as service provider): E: info@reachlaw.fi; I: www.reachlaw.fi

Glossary of key terms

Term	Definition
Authorisation number	An authorisation number is unique to each combination of [applicant-substance-use applied for]. If the downstream user is not an applicant but that he relies on an authorisation granted to a manufacturer/importer up his supply chain for his uses, the downstream user will not receive his own authorisation number(s) but he will be informed by his supplier about the authorisation number. The authorisation number is included in the SDS provided by the supplier. It should also be visible on the label of the substance or mixture. It has the format "REACH/x/x/x". If you do not find that number, please contact your supplier. – See also ECHA Q&A 0750 dd. 04/06/2015 and Q&A 1441 dd. 26/10/2017
Downstream user (DU)	*Any natural or legal person established within the Community, other than the manufacturer or the importer, who uses a substance, either on its own or in a mixture, in the course of his industrial or professional activities. A distributor or a consumer is not a downstream user. A re-importer exempted pursuant to REACH Article 2(7)(c) shall be regarded as a downstream user* – REACH Art. 3(13)
EEA	European Economic Area: All Member States of the European Union (EU) incl. French Guiana, as well as in Norway, Iceland and Liechtenstein. EU REACH applies in the EEA territory and Northern Ireland. Great Britain, Switzerland or Türkiye are outside the EU REACH territory.
'Extended' SDS	A Safety Data Sheet according to REACH with the relevant exposure scenarios in an annex covering identified uses– REACH Art. 31(9)
Use	*Any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilization* – REACH Art. 31(7)

Appendix 2: Comparison of ADCR authorisation decisions under EU REACH vs. UK REACH

***Note**: The table below presents an illustrative comparison of ADCR authorisation decisions under EU REACH vs. UK REACH for the use of chromium trioxide in chemical conversion coating in aerospace and defence industry and its supply chains. Please read the full text of the authorisation decisions to capture the precise scope and full wording, including the recitals / reasons provided and view the ADCR supporting materials at https://www.adcr-consortium.eu/adcr-guidance-and-support. A previous version of this comparison was included in document MPTB-RL-HO-0167 of 12.11.2024.*

	EU REACH	**UK REACH**
Decision reference (LINK)	C(2025) 94 (LINK)	032-01 (LINK)
Authorisation holder	Cromital S.P.A.	Henkel Ltd
Authorised use	*Use of chromium trioxide in chemical conversion coating in aerospace and defence industry and its supply chains*	
Authorisation number	**REACH/24/61/3**	**UKREACH/24/15/5**
Adoption date	20.1.2025	5.9.2024
Expiry date (review period)	20.12.2034 (12 years from submission of application)	5.9.2036 (12 years from adoption)
CSR (Chemical Safety Report) compliance	Authorisation holder and DUs to adhere to the operational conditions (OCs) and risk management measures (RMMs) in the CSR part of the application, as described in section 9 (exposure assessment) and 10 (risk characterization related to combined exposure)	

Additional conditions	- *Art. 2(2)*: without delay, and at the latest 12 months from the adoption (i.e. by 20.1.2026):
	  ○ implement the necessary technical improvements to RMMs and OCs
	  ○ LEV requirements
	- *Art. 2(3)*: RPE use requirements
	- *Art. 2(4)*: conduct control measurements + implement additional RMMs and OCs if necessary
	- *Art. 2(5)*: by 12 months from adoption (i.e. by 20.1.2026) and afterwards each time there is new info: Carry out feasibility studies on:
	  ○ substitution with liquid solutions
	  ○ closed or automatic system to perform bath sampling tasks
	  ○ LEV continuous control system
	  ○ air abatement system
	  ○ act according to studies outcome
	- *Art. 2(6)*: carry out a monitoring programme measuring occupational exposure to Cr(V) at all sites, incl. at least annual measurements and other conditions according to (a)-(f)
	- *Art. 2(7)*: Continue already ongoing biomonitoring programmes
	- *Art. 2(8)*: Review, at least annually, the RMMs and OCs in place based on measurements under Art. 2(6) and (7) +
		[only reference to the legal requirement in Art. 60(10) of UK REACH to ensure exposure is reduced to as low a level as is technically and practically feasible]

	review and, if needed, update assessment of combined exposure for workers + if needed, introduce measures to further reduce possible occupational exposure - *Art. 2(9)*: Document and maintain the documentation from the monitoring programmes, control measurements etc. and make it available upon request to the Member State competent authority	
Monitoring arrangements	- *Art. 4(2)*: Carry out a monitoring programme measuring the environmental releases of Cr(VI) to the air and wastewater at all sites, incl. incl. at least annual measurements and other conditions according to (a)-(e) - *Art. 4(3)*: Review, at least annually, the RMMs and OCs in place based on measurements under Art. 4(2) + review and, if needed, update assessment of exposure of the general population via the environment + if needed, introduce measures to further reduce possible Cr(VI) emissions to the environment - *Art. 4(4)*: Document and maintain the documentation from the monitoring programme, etc. and make it available upon request to the Member State competent authority - *Art. 4(5)*: Document the steps taken to substitute chromium trioxide in accordance with the substitution plan, deviations and contingency measures, and make it available upon request to the Member State competent authority	"The authorisation is not subject to any monitoring arrangements." (point 5. of the Decision)
Review report	Mandatory information (Art. 5)	HSE recommendations (point 6. of the Decision)
Brief summary of applicable RMMs + OCs	*Art. 6*: Submit brief summary upon request to the Member State competent authority, in an official language of that Member State	Not required