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# ***REACH AUTHORISATION***

# ***AEROSPACE EXPERIENCE AND DEVELOPMENTS***

***21 MAY 2014***

**Steve George, Chair ASD REACH Working Group**



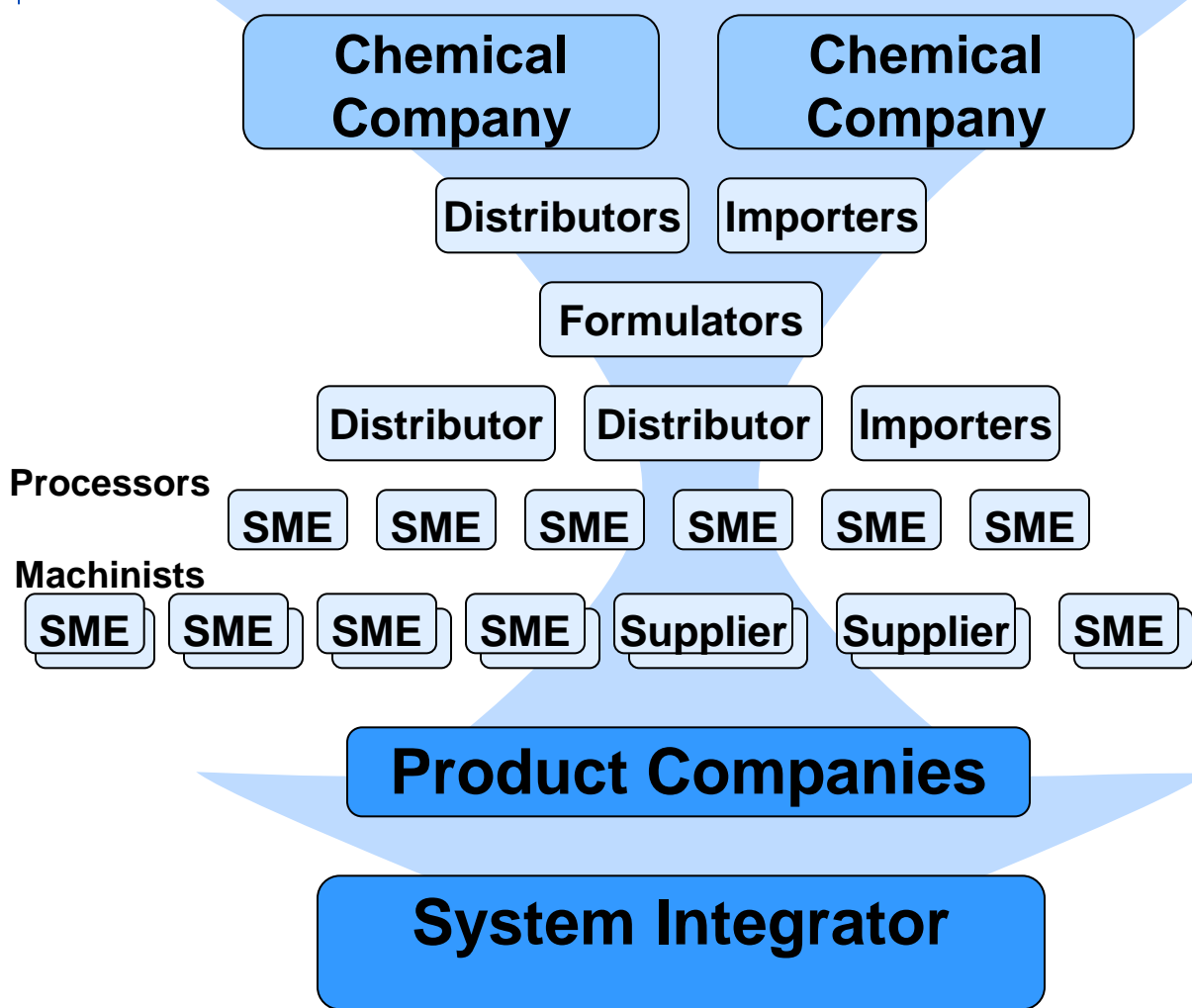
## REACH in Aerospace and Defence

- **Aerospace and Defence industries support the intent of REACH**
  - In particular workplace and environmental protection
- **Aerospace is separately regulated for product safety:**
  - We always prioritise airworthiness and safety
  - Product changes require substantive evidence of compliance with safety standards
  - Alternate materials are being developed, but where not validated we cannot substitute
  - Repair of existing products is often dependent on materials we do not wish to use in the future...backward compatibility an issue
  - Product Changes can rarely be made at short notice

**Short notice changes or chemical product withdrawals may result in unbearable limitations**



# Supply Chain complexity is a major issue with REACH



**Long/Complex Supply Chains, 8+ layers**

**No relationship between ends of chain**

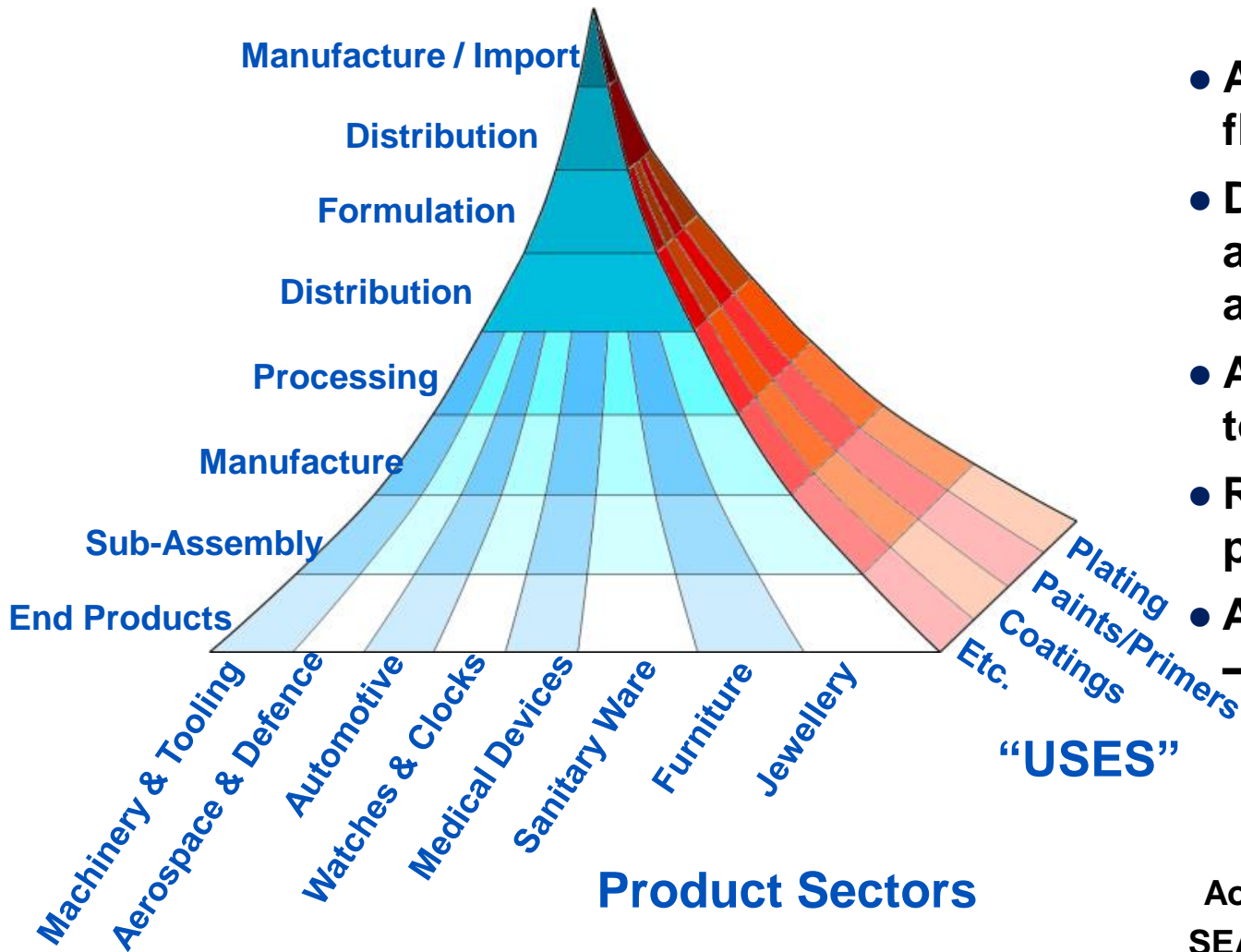
**CBI and Export Control Barriers**

**Global impact due to international supply chains**

**Communication issues are all around...**

**REACH complexity an issue for mid-chain SMEs**

# Authorisation with Multiple Product Sectors



- Authorisation naturally flows downstream
- Downstream user application only works in a minority of cases
- AoA/SEA often specific to the Product Sector
- Review period might be product sector specific
- Authorisation is by “use” – how to define?

AoA = Analysis of Alternatives  
SEA – Socio-Economic Analysis

- In 2012 it was recognised that:
  - Complex supply chains raise many process issues with Authorisation
  - Authorisation is “Mission Critical” for some industry sectors
- Particular issues relate to:
  - Who defines an Alternative availability? “Available” vs. “Qualified”?
  - Who should apply for Authorisation?
  - What does a “Use” look like?
  - How to construct an SEA or AoA
- EASA, ECHA, ASD and AEA and others have explored these key issues
  - Released 15 April on ECHA Web-site
  - Direct or indirect relevance to other sectors



**Different models and approaches  
Not all experience comparable!**

## Case 1 DEHP

- DU application
- 1 use
- Adequate Control
- 1 Company
- ~€250k cost
- 15 months work

**Additionally, Chromates in Surface Treatment consortium (in work), and many company-specific activities**

## Case 2 Chromium Trioxide

- Consortium of ~150 companies
- 1000's of companies affected
- Socio-Economic Justification
- 6 use categories
- ~€1.5M Total cost without Fees
  - €10k-50k per member
- At least 4 years work
- Application strategy is still work in progress
  - Separate Agreements needed

- **Lesson 1 – Really Understand Potential Alternatives**
  - Authorisation application is not simple and can be expensive, substitution is Priority #1!
  - Early assessment is worthwhile & needed for the Authorisation dossier.
  - Helps to justify the review period and the SEA argument
  
- **Lesson 2 – Understand the Supply Chain in detail**
  - Supply chains can be surprisingly complex
  - Not every actor can apply, nor has the same commercial interest;
  - Understanding the supply chain will help to understand intentions, strategy and help consortium formation.
  
- **Lesson 3 – Plan to Start Early**
  - Even in the simplest cases an application will take many months;
  - Complex supply chains require significant cooperation with many other companies, and this takes years.

- **Lesson 4 – How you organise is very important**
  - Consortia are not easy to manage, are slow, but do dilute costs
  - Many different motivations, roles and objectives, confidentiality issues
  - It is in the interest of all to group applications, and minimise the number needed... so consider who needs to apply!
  
- **Lesson 5 - Independently check you current risk controls**
  - A fresh set of eyes can identify risks you do not see
  - Best available technology may have advanced or become affordable
  - Article 66 Notifications could prompt your national authority to check
  
- **Lesson 6 - Maintain Dialogue Throughout**
  - PSIS Sessions are a positive innovation, use them!
  - Dialogue with ECHA should identify any problems early on
  - Use the seminars and workshops to understand the process and committees



- **ASD will continue to work cooperatively with Authorities and other associations as needed**
- **Many uncertainties yet to be resolved for complex supply chains:**
  - **How Trialogues with RAC and SEAC will work**
  - **Commercial - who will actually apply, pay and how?**
- **Global industry initiatives are also necessary**
  - **Major industry players use the same supply chain**
  - **Different approaches increase cost and confusion**
- **IAEG launched to help international Aerospace industry on a range of issues, now extended to Authorisation management**

**The journey has just begun**

# Thank-you for listening

## And also to:

- **ECHA, for cooperation in understanding of complex supply chain issues, and committing to a contact facility to allow companies communicate Authorisation interests**
- **EASA, for sharing understanding of Aviation product regulation with ECHA**
- **Trade association colleagues, such as AEA, Cefic, FECC, Eurometaux, DUCG for cooperative working**