

COMMENTS AND RESPONSE TO COMMENTS ON AUTHORISATION

Substance name: Chromium trioxide

EC number: 215-607-8

CAS number: 1333-82-0

Broad information on use applied for (title): Functional chrome plating of parts with complex surface geometry and requiring the use of an auxiliary anode

Consultation number: 0280-02

Applicant name: TECNOCROM INDUSTRIAL, S.A.; ALLION ESPAÑOLA S.A.; CROMADO INDUSTRIAL SARRASIN S.L.; CROMEAL, S.L.; Talleres Acro, S. A.; DUOKROM, SL; IkanKronitek, S.L.; CROMO DURO ANFER S.A.; GIROCLAD, SL; OVIDICROM S.L.; RECTIFICADOS DELVAL S.A; REQUEL S.L.; Talleres Durocrom S. L.; TALLERES GUMILA, S.L.

Consultation period: 17/08/2022 - 12/10/2022

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Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 1388 Date: 2022/10/12 Type of comment:* The comment provides information that is generally not in support of the application	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Non-governmental organisation (NGO) Name of org/company: ChemSec Country: Sweden					several proposals		Comment 1388 Attachment.doc
Applicants' response:								

The applicants have been made aware of one single comment received during the public consultations of its AfA, submitted by ChemSec, and would like to take this opportunity to thank the commenter for their inputs and to respond to the comment, which will be extensively quoted here (in blue colour).

It is important to remark that the AfA has been submitted by a group of 7 micro-enterprises, 5 small, and 2 medium-sized companies. The group of applying companies acts as job platers and they use Cr(VI) for plating several components with different size and surface geometries which find application in several industry sectors, such as (but not limited to) automotive, machinery, food, and energy.

To specifically answer to the points raised in the comments:

1) It should be considered which specific functionalities are required for each product in the applicants' portfolio

As mentioned at page 44, the functionalities described are basic requirements that must be fulfilled by all components that are plated by the applicant, regardless their end applications. Although some components might have additional requirements (depending on the end application), the functionalities used for assessing the most promising alternative are the basic requirements that need to be fulfilled to implement an alternative.

2) It should be carefully assessed if tested alternatives may work for some, but not all, uses applied for. These uses should be clearly specified

As mentioned in page 71, during the first step of the substitution process, the applicants are planning to run component-specific tests to assess the performance of the most promising alternative. At the current stage of development these data are not yet available. Nevertheless, it is important to emphasize that – due to the applicants' business model – the companies will have to implement an alternative that fulfil the functionalities of the great majority of their own portfolio. It would be indeed not feasible for none of the applicants to run multiple different surface treatments at their sites.

3) For each product type, it must be considered if the product can be supplied without a surface layer, or if other products could fulfil the same function in the final application

As previously mentioned, the group of applicants are job platers and provide surface treatments for third parties. The applicants do not own the components nor have any influence in finding alternative application of the product.

Additionally, ChemSec criticizes the approach of asking customers if they would accept alternatives with other or less functionalities, as it is not considered viable in this type of application. The applicants are of the opinion that the only way to find an alternative to Cr(VI) plating is to engage in discussions with their customers and analyze the alternatives available on the market. The group of applicants are not in the position of implementing an alternative without prior discussing its performance with their customer and cannot force their clients to switch to alternative surface treatments that have lower performance and quality.

In conclusion ChemSec stated that [no review period should be longer than 4 years](#). Beside to the date of inclusion of chromium trioxide in Annex XIV mentioned in the comment, it is not clear to the applicant the rationale behind this statement, as no technical data on alternatives, information on performance of alternative treatments, industry acceptance statistics, implementation strategy, etc. as been provided by the commenter. Overall, the applicants strongly believe that the information reported in the AfA for both uses applied for are adequate to support the requested review period.