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Authorisation – whats happening ?

Phil Humphries

Chair - ASD REACH Working Group on Authorisation

20th June 2013

European Aerospace and Defence Industry

- €175bn turnover
- 20 countries
- 2000+ companies
- 1.3% EU GDP
- 730,000 employees



Its not as bad as you think





What I said Last time

- Aerospace/Defence are dependent on many substances, particularly Chromates at this time for safety reasons
- Proven and safe alternatives research takes years, is in progress, but unlikely to be fully successful in the timescale
- Authorisation is a new and complex process
- Supply chain complexity adds many challenges
- There are unresolved risks in the Authorisation process
- We need to know if the supply chain for chemicals and substances we use is going to change

You can help

- 1 **Communicate !**
- 2 **Comunicar !**
- 3 **Communiquer !**
- 4 **Kommunizieren !**
- 5 **Comunicare !**



What we asked for last time.....

- If you think you might want to withdraw a substance let us know before you do
 - ▶ **We may be able to help your business case**
 - ▶ **We will need time to find an alternative supplier**
 - ▶ **We may support a potential authorisation application**

- Where we know them, we have contacted our suppliers with our uses for registration, but this may take a while to get back to you.
 - ▶ **Please include our uses or let us know if you are not going to**

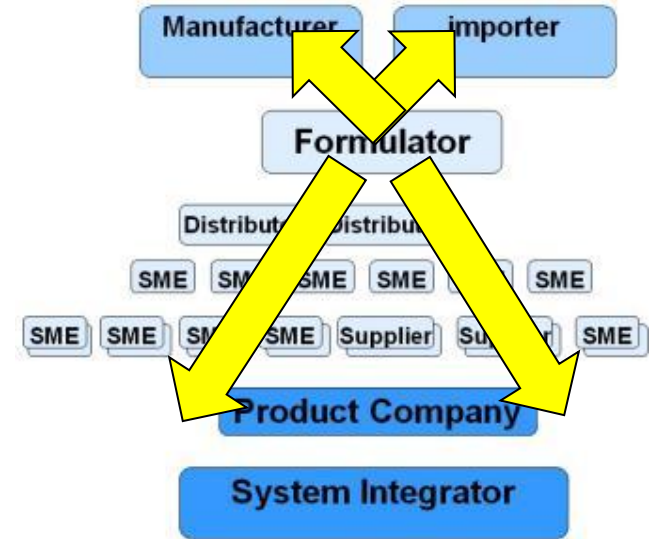
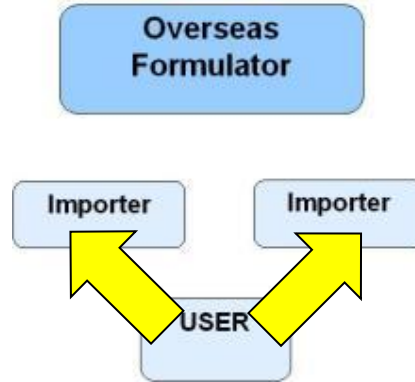
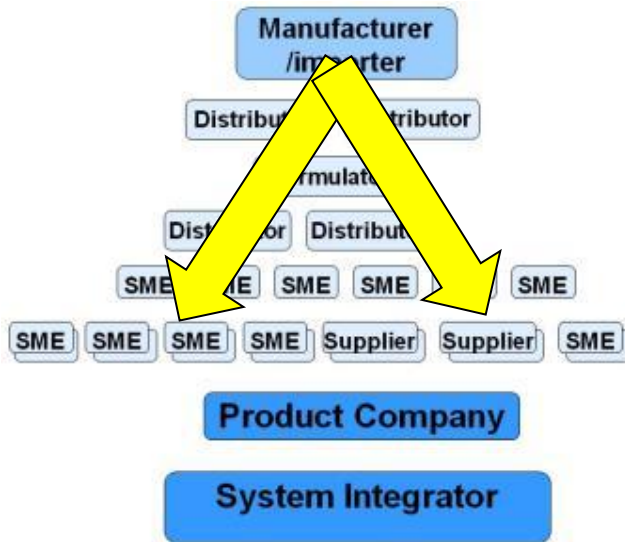
- Where we need authorisation we need a lead applicant
 - ▶ **Manufacturers/distributors/formulators can cover all of the downstream uses, we can only cover one upstream supplier's uses**



What we have done since...

- There is now guidance for Industry on authorisation available
- It can be found on the Cefic website
- It was jointly written and agreed by a number of European industry associations
- Our governing body EASA together with ECHA , the Aerospace Industry, Cefic and FECC have been working on finding areas to improve or help companies through the authorisation process.
- We will soon be issuing letters through Cefic asking you to tell us what your intentions are with regards to substances on or planned to be on Annex XIV
- Later we will be asking you similar questions about Candidate list substances

We can help each other



“A” Approach

- M/I is Applicant
- Covers multiple industries with different risks & economic drivers
- Aerospace element potentially inseparable from the rest

“V” Approach

- DU is Applicant
- Only Authorises DU and immediate supplier(s)
- Not practical for complex supply chains

Hybrid/Combinations

- Other options depending on supply chain and uses
- Structure and stakeholder management are key
- Engagement and cooperation of M/Is paramount



Authorisation – Lessons Learnt

- The authorisation submission requires you to use IUCLID and REACH IT – familiarise yourself with both
- You have to repeat a lot of your dossier on-line
- If you are going down the “adequate control route” its worth doing a high level Socio Economic Analysis as well
- Assume that any CSR you get access to wont be good enough and will need additional work
- Assume that your monitoring data will need updating
- Distinguish clearly between data that is public or Business Confidential – the default position is Public
- Use the pre-submission information session (PSIS) – you get to meet your case management team and clarify issues
- Keep your SEA as simple as possible
- Distinguish clearly between an alternative and a substitute

QUESTIONS