

Notes from the Executive Director meeting with ASD Europe

Time:	16 March 2023 at 10.00-11.00
Place:	MSTeams
ASD Participants	• [REDACTED], ASD) • [REDACTED], ASD) • [REDACTED], ASD) • [REDACTED], Airbus) • [REDACTED], BDLI) • [REDACTED], Leonardo)
ECHA Participants	Sharon McGuinness (SMG), Peter van der Zandt (PvdZ)
Agenda item	Discussion points
Introduction	The meeting started with a short introduction of all participations as well as an overview of ASD, which is made up of 20 individual companies and 20+ national associations from across Europe. They also noted they have a high level of ambition on environment and have committed to decarbonisation of aviation by 2050. They are working with several EU agencies (EASA, Space Agency, Defence Agency) etc., to ensure aviation safety as well as working to substitute several chemicals, which takes time given that they must meet aviation safety standards and have a long product lifecycle. They also operate on a "repair as produced" model for the global aviation fleet, which requires them to use the same substance as that which went into making the aircraft.
Discussion	Discussion centered on three items – REACH Revision, Authorisation of Chromium and PFAS restriction. REACH Revision ASD outlined some of their main areas of concern including the need to remain competitive and hence retaining the possibility to apply for authorisations as well as having the possibility of using minimum exposure route to help simplify authorisation. They also would like to have clarity on the criteria for deciding the essential use concept and understand better which authority will be deciding this. In response, we noted their concerns and highlighted that we are providing inputs and support to the COM, who ultimately are responsible for the development of the revised REACH regulation. REACH Authorisation for Chrome VI ASD and the sector are concerned about the upcoming renewals on authorisations as they are not sure if these will be granted. While efforts are being made to find alternatives, they do not as yet have viable alternatives. They mentioned that in the upcoming renewals, there will also be new authorisation applications and any delays in granting the authorisations could have a serious impact on their supply chains. Currently two different

consortia involved – ADCR and CTAC.

In response, PdvZ noted their comments and concerns and outlined the process involved for these applications.

PFAS Restriction

ASD fully understands the concerns regarding PFAS and in particular the issues regarding its manufacture. Sector is primarily a DU (3-4 levels away from manufacturer) and finding it hard to get information on where and how PFAS substances are used within their sector and supply chain. They noted that in fire extinguishers in planes they had moved to PFAS substances as an alternative to halons, due to regulatory changes for the latter compounds. Now they were facing the challenge that their PFAS alternative could be banned/restricted. PFAS is used in fire-fighting and other uses by the sector. For example, use in fire extinguishers needed on airplanes.

PvdZ outlined the restriction process and details regarding upcoming workshop and public consultation. Mention was also made of current restriction dossier on PFAS in fire-fighting foams, which is going through RAC/SEAC. ASD was advised to review the dossier and pointed to current outcomes from RAC and SEAC's draft opinion and consultation.