



la fuerza del talento

**ECHA**

European Chemicals Agency

For the attention of **Members of the Member State Committee**

Our/Rfa.: REF.: DC-C-034-11

Zamudio, 13<sup>th</sup> September 2011

**Subject: Ammonium Dichromate Exemption Request**

Dear Member State Committee:

Ammonium dichromate (CAS 7789-09-5 EC 232-143-1) has been classified as

- Carcinogen category 2, R45 (May cause cancer)
- Mutagen category 2, R46 (May cause heritable genetic damage)
- Toxic to reproduction category 2, R60-61 (May impair fertility. May cause harm to the unborn child)

Due to this classification, this substance was added to the candidate list for authorization in June 2010.

On 15<sup>th</sup> June 2011 ECHA launches a public consultation on its draft recommendation of thirteen new substances to be prioritized from the Candidate List for the Authorization List, this list includes ammonium dichromate.

ITP, as a designer and manufacturer of Low Pressure Turbines for aeronautic engines, agrees with this classification and support the principle of prioritization based on classification of the substances in combination with the additional criteria of wide dispersive uses and high production volumes.

With the basis of Article 58 (2) & 56 (1, 2, & 3) of REACH regulation and also the definition of the Article 3(23), ITP would request to the members to consider exemption from authorization requirement for the specific use of ammonium dichromate as a substance for Scientific Research & Development (SRD) of low pressure turbines.

According to Article 58(2),

"Uses or categories of uses may be exempted from the authorization requirement provided that, on the basis of the existing specific Community legislation imposing minimum requirements relating to the protection of human health or the environment for the use of the substance, the risk is properly controlled. In the establishment of such exemptions, account shall be taken, in particular, of the proportionality of risk to human health and the environment related to the nature of the substance, such as where the risk is modified by the physical form"

And the article 56 (1, 2, & 3) states

"1.- A manufacturer, importer or downstream user shall not place a substance on the market for a use or use it himself if that substance is included in Annex XIV, unless: .....

2.- A downstream user may use a substance meeting the criteria set out in paragraph 1 provided that the use is in accordance with the conditions of an authorization granted to an actor up his supply chain for that use.

3.- Paragraphs 1 and 2 shall **not apply to the use of substances in scientific research and development**. Annex XIV shall specify if paragraphs 1 and 2 apply to product and process orientated research and development as well as the maximum quantity exempted."

And also according to definition of the article 3 (23)

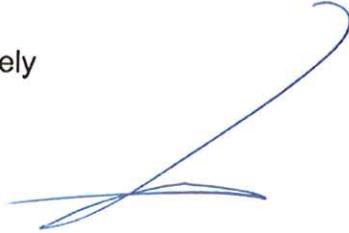
"Scientific research and development: means any scientific experimentation, analysis or chemical research carried out under controlled conditions in a volume less than 1 tonne per year"

The request of exemption from the authorization requirement for the substance ammonium dichromate is based on the fact that the risk to human health and the environment associated with use is very low given the conditions in ITP.

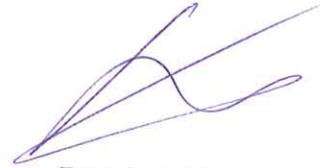
These conditions are explained in more detail in the attached document, which contains information on the following topics:

- 1.- Exclusive use of ammonium dichromate in Scientific Research & Development for low pressure turbines
- 2.- Controlled conditions of use.
- 3.- Use of very low quantity of ammonium dichromate
- 4.- Ammonium dichromate in the workplace environment

Yours sincerely



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Enclosures: Use of ammonium dichromate in ITP

