

**Third party submission of information on alternatives for
Applications for Authorisation**

PUBLIC

Legal name of submitter(s):	<i>Vergason Technology, Inc.</i>
Substance:	<i>Chromium trioxide, EC No: 215-607-8, CAS No: 1333-82-0</i>
Use title:	<i>Functional chrome plating with decorative character</i>
Use number:	<i>3</i>

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DECLARATION

We, Vergason Technology, request that the information blanked out in the "public version" of this third party submission of information on alternatives is not disclosed. We hereby declare that, to the best of our knowledge as of today, (January 2017) the information is not publicly available, and in accordance with the due measures of protection that we have implemented, a member of the public should not be able to obtain access to the information claimed confidential without our consent or that of the third party whose commercial interests are at stake.

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Date, Place:

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Van Etten, New York

1. ALTERNATIVE ID AND PROPERTIES

SUPERCHROME PVD COATING from VTI is a PVD over lacquer process for Chrome on Plastic for Automotive Applications (CoPAA). SUPERCHROME PVD COATING is immediately available for industrial production to begin the transition away from electroplating methods for producing CoPAA. SUPERCHROME PVD COATING meets or exceeds all automotive OEM technical specifications when prescribed manufacturing methods are implemented. SUPERCHROME PVD COATING is suited to all surfaces of all commonly accepted materials used in the automobile industry for CoPAA.

In addition, we would like to refer to our earlier comments to the Gerhardt application for authorisation #0071-01. Furthermore, we would like to give additional information below:

2. VERGASON TECHNOLOGY, INC. AND JOBATEC GMBH INTRODUCTION:

- VTI has 30 Years experience in PVD technology for reflective and decorative coatings on plastic substrates.
- > 200 PVD Systems from VTI have been installed worldwide: the majority of VTI's PVD systems are used for coating plastic substrates in the automotive industry.
- VTI designs and manufactures PVD coating systems at their headquarters in Van Etten, NY – USA.
- VTI has a long history of process development for decorative metallic thin film coatings on plastic substrates.
- Over the past years VTI developed SUPERCHROME PVD COATING as an alternative to hexavalent chrome-based plating for the automotive industry.
- SUPERCHROME PVD COATING is a two layer coating stack, consisting of a UV-cured base coat and a SUPERCHROME PVD layer. SUPERCHROME does not require a painted top coat.
- Prototyping, pre-series production and job coating services are available at VTI.
- Sales & Service in Europe for VTI's PVD coating systems is provided by jobaTEC GmbH, located in St. Wendel, Germany.

3. TECHNICAL COMPLIANCE/FEASIBILITY OF PVD TECHNOLOGY:

- Decorative PVD coatings in chrome optic are already approved by OEMs and they have been widely in use for several years in the automotive industry in Europe:
 - OEMs who use PVD coatings: Daimler, Audi, VW, BMW, Renault
 - Suppliers of PVD coated parts: Bensele, Decorative Products, Demo Injection, GFO, Greencoat, Hübner, Oerlikon Balzers, Preh, Silcos, Varioplast, Zanini
- Extensive positive test results for SUPERCHROME PVD COATING are in house from OEMs, partners, test institutes and potential customers with OEM approved test equipment for interior and exterior automotive applications.
- VTI has received OEM approvals for SUPERCHROME PVD COATING from Daimler/Mercedes in Germany and PSA in France. OEM approval from Renault is expected in the coming weeks. Further OEM approvals in Europe are expected during 2017.
- Significant improvements in the performance of the SUPERCHROME PVD COATING have been achieved during the last 12 months leading to the above – mentioned OEM approvals.
- Four different standard sizes for SUPERCHROME PVD COATING SYSTEMS are available. The annual coating capacity ranges from 60.000 m² for the SC660 coating system to 134.000 m² for the SC1250XT coating system.

- SUPERCHROME PVD COATING SYSTEM size is selected depending on geometry, size and annual volume of the parts.
- Lead time for a SUPERCHROME PVD COATING SYSTEM from the order till production start-up at the customer site is approx. 6 months.

4. AVAILABILITY OF SUPERCHROME EQUIPMENT TECHNOLOGY

- The Market roll-out for the SUPERCHROME PVD COATING SYSTEMS has started: the first SUPERCHROME PVD COATING SYSTEM is currently in delivery to a Tier2 in France.
- The SUPERCHROME PVD COATING SYSTEM in France will start operation in January 2017.
- VTI currently has an annual production capacity for SUPERCHROME PVD COATING SYSTEMS of 50 systems.
- Further steps to increase production capacity for SUPERCHROME PVD COATING SYSTEMS are currently being pursued both locally at VTI and through licensed manufacturing in Europe. This will allow VTI to increase annual production capacity to 100+ SUPERCHROME PVD COATING SYSTEMS over the next two years.

5. COMMERCIAL ADVANTAGE:

- 12 to 15 automotive suppliers (Tier1/Tier2) are currently planning to invest in SUPERCHROME PVD COATING SYSTEMS in Europe.
- Each customer performed detailed cost calculation for their current part range (including injection molding, painting and SUPERCHROME PVD COATING)
- Each customer did a ROI analysis considering the investment in SUPERCHROME PVD COATING technology
- On average these Tier1/Tier2 saw potential cost saving of in the range of 15 – 20% per part for SUPERCHROME PVD COATING compared with galvanic chrome plating

6. MARKET VOLUME / MARKET SHARE

This information is only available in the confidential version.

7. GENERAL ASPECTS

- The SUPERCHROME PVD COATING technology is preserving and protecting jobs in the Automotive Industry in Europe. Former operators of a galvanic chrome-plating line can be trained in a short time to work with the SUPERCHROME PVD COATING technology which provides a cleaner, healthier and less hazardous working environment.
- VTI strongly favors a review period of no more than 4 years. Longer review periods will have a significantly negative effect on the market penetration and further development of alternatives to the use of hexavalent chromium. When a review period of 12 years was recommended for Grohe, the sanitary fittings manufacturer, earlier this year, Grohe stopped all activities regarding the replacement of galvanic chrome plating by SUPERCHROME PVD COATING.
- The need to supply parts for automobile models until end of life, which can be a decade beyond introduction, should not justify extending an end date for electroplating. Rather, a “grandfather provision” could be introduced, allowing electroplating for series contracts that are fully executed before the cut-off date, but not allowing new contracts after the cut-off.
- We strongly prefer that all information should be discussed openly in the discussion between ECHA, the applicants and the providers of alternative technology.
- There is no reasonable cause for the further use of a carcinogenic/mutagenic and environmentally hazardous process for solely decorative purposes. Especially as there are technically as well as economically viable alternatives available and already used in the automotive industry in Europe.