APEAL'S RESPONSE TO THE PUBLIC CONSULTATION RELATING TO THE REACH APPLICATION FOR AUTORISATION FOR CHROMIUM TRIOXIDE FOR ECCS PRODUCTION

APEAL confirms the conclusions of the present Application for Authorisation for the ECCS manufacturing, in particular the lack of an alternative offering comparable performances and application scope, as well as the extremely long development process needed justifying the longest possible authorisation review period.

APEAL - the Association of European Producers of Steel for Packaging - is a federation of four multinational producers of steel for packaging in Europe, representing 95% of the total European production of steel for packaging. APEAL welcomes the opportunity to participate in the public consultation relating to the REACH Application for Authorisation for chromium trioxide used in the manufacture of ECCS. APEAL is pleased to submit its combined response integrating the position of its contributing members. As an industry who takes safety and environment seriously, APEAL is eager to actively participate in this consultation and provide its input.

Regarding the manufacturing of electrolytic chromium coated steel (ECCS), and in order to proactively develop sustainable alternatives at a European level, research on alternatives were executed in a European Commission funded project, the IPSA project\(^1\). The objective of this project was to develop and evaluate an innovative packaging steel with enhanced adhesion to organic coatings allowing deforming processes and leading to excellent corrosion resistance. The IPSA work programme ended in December 2011. The alternatives identified were not fully covering for the replacement of all uses. The potential alternatives will also still need to be qualified by customers and to develop an application process equipment to industrialise the solution. So far, results of the substitution trials indicate that it is not possible to switch to an alternative that can guarantee equivalent technical performance before the expected sunset date.

The APEAL member companies confirm the conclusions and arguments developed by the applicant in the application for authorisation dossier for this use.

No potential alternative has been identified at this stage for the replacement of chromates in ECCS production with the same application scope.

\(^1\) Innovative packaging steel with enhanced adhesion to organic coatings based on nanostructured interphases
The substitution to an alternative is a technical development that requires extensive qualification trials with the steel for packaging users (can makers and food and drinks industry) given their use for e.g. food/drink packaging. Moreover, the experiments involve product tests, so called shelf life tests, which require several years of qualification. Although steel for packaging is not exclusively used for food & drink packaging, or for packaging altogether, these constraints drive the R&D for alternatives to chromates as they are the most restrictive.

The APEAL members recall that there are no chromates remaining on finished packaging steel. The APEAL members also would like to underline that the only potential stage where there might be an exposure to chromium VI compounds is limited to work places during the steel for packaging production stage, where strong risk management measures are applied.

In conclusion, the APEAL members support the Authorisation request as long as possible for ECCS.

We thank you again for the opportunity to contribute to this very important decision.

Ulrich Roeske, President of APEAL