

COMMENTS AND RESPONSE TO COMMENTS ON AUTHORISATION

Substance name: Potassium dichromate

EC number: 231-906-6

CAS number: 7778-50-9

Broad information on use applied for (title): Use of potassium dichromate for surface treatment of metals such as aluminium, steel, zinc, magnesium, titanium, alloys, composites, sealings of anodic films

Consultation number: 0044-02

Applicant name: Brenntag UK Ltd

Consultation period: 10/02/2016 - 06/04/2016

*The categorisation of the comment is performed by the comment submitter(s). Its aim is to facilitate greater transparency for the applicant and the public. ECHA neither endorses nor reviews the categorisation. The categorisation does not reflect the opinion of either the Committees, or ECHA's secretariat. ECHA does not accept any liability with regard to damage caused by erroneous categorisation of the comments by the submitter(s). The category selected will in no way influence how the comment and the information provided in it will be taken into account during the authorisation process.

Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 879 Date: 2016/04/06 Type of comment : * The comment provides information that is generally in support of the application	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Industry or trade association Name of org/company: ESTAL Country: Belgium					Support of the AoA as submitted in the application		Comment 879 Attachment.doc

Applicants' response:								
Under applicable legal principles, the use definition should be interpreted in conjunction with the content of the application.								
Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 842 Date: 2016/04/05 Type of comment :*	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Non-governmental organisation (NGO) Name of org/company: ChemSec Country: Sweden					Producers of alternatives have previously been disfavored in the AfA process. This is not the intention of REACH and we hope ECHA committees now focus more on alternative providers.		Comment 842 Attachment.doc
Applicants' response:								
[Insert text here]								
Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 830 Date: 2016/04/05 Type of comment :* The comment provides information that is generally in support	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Industry or trade association Name of org/company: AeroSpace and Defence Industries Association of Europe Country: Belgium					ASD supports the application for Authorisation for the uses of Dichromium tris(chromate), Potassium dichromate, Sodium dichromate, Strontium chromate, Potassium hydroxyoctaoxodizincatedichromate in the specified cases (see attachment for complete comment)		Comment 830 Attachment.pdf

of the application								
Applicants' response:								
[Insert text here]								
Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 817 Date: 2016/04/05 Type of comment : The comment provides information that is generally not in support of the application	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Industry or trade association Name of org/company: Aerospace Industries Association Country: United States					AIA supports the assertions of the CCST AoA that technically feasible alternatives to chromate-based surface treatment systems are not currently available for broad application to key applications in the aerospace sector.		Comment 817 Attachment.pdf
Applicants' response:								
[Insert text here]								
Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 811 Date: 2016/04/04 Type of comment :	Affiliation: BehalfOfACompany Type/Role in the supply chain: Downstream User Name of org/company:					There is no technical alternative.		Comment 811 Attachment.docx

:* The comment provides information that is generally in support of the application	MTU Aero Engines AG Country: Germany							
Applicants' response:								
[Insert text here]								
Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	
Ref.No: 795 Date: 2016/04/04 Type of comment :* The comment provides information that is generally in support of the application	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Industry or trade association Name of org/company: ADS Group Limited Country: United Kingdom					The issue lies in the limitations in the current selection of alternatives and the timescale available for seeking further, more comparable alternatives for testing, approval and implementation once identified. This will require airworthiness verification, the responsibility of the regulatory authorities such as EASA, etc.		Comment 795 Attachment.pdf
Applicants' response:								
[Insert text here]								
Reference number and date:	Submitter:	Alternative:						Attachments:
		Type	Generic name	EC Number	CAS Number	Description of technical alternative	Classification and Labelling	

Ref.No: 775 Date: 2016/02/11 Type of comment *: The comment provides information that is generally in support of the application	Affiliation: BehalfOfAnOrganisation Type/Role in the supply chain: Other Name of org/company: REACH Compliant Hexavalent Chrome Replacement for Corrosion Protection Country: United Kingdom					N/A		Comment 775 Attachment.doc
Applicants' response:								
[Insert text here]								