

A collage of four images representing different aspects of aerospace and defense: a commercial airplane in flight, a rocket launch, a naval ship, and a military tank.

# **EASA/ECHA**

## **REACH Authorisation and Aviation**

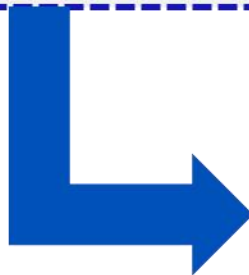
EASA Certification Workshop  
30 January 2014

***Status after Steering  
Committee meeting***

## Steering Committee

Industry (ASD/AEA/US), EASA, ECHA (and EC where required)

To provide purpose, direction, support and resources



## Working Groups

### WP1

- Simplified AoA and SEA for Production and Aftermarket Applications

### WP2

- How should use be defined, and who should apply?

### WP3

- Develop Risk Mitigations with Authorities

### WP4

- Standardised Communication of alternatives availability for users

Composition of the Steering Committee	
<b>Juan Anton</b>	<a href="mailto:juan.anton@easa.europa.eu">juan.anton@easa.europa.eu</a>
<b>Matti Vainio</b>	<a href="mailto:Matti.VAINIO@echa.europa.eu">Matti.VAINIO@echa.europa.eu</a>
<b>Francis Couillard (ASD)</b>	<a href="mailto:Francis.couillard@safran.fr">Francis.couillard@safran.fr</a>
<b>Steve George (ASD)</b>	<a href="mailto:Steve.george@rolls-royce.com">Steve.george@rolls-royce.com</a>
<b>Philippe de Gouttes (ICCAIA – ASD)</b>	<a href="mailto:Philippe.De-gouttes@airbus.com">Philippe.De-gouttes@airbus.com</a>
<b>Christine Triai (ASD)</b>	<a href="mailto:christine.triai@eurocopter.com">christine.triai@eurocopter.com</a>
<b>Janna Schroeder (AEA)</b>	<a href="mailto:janna.schroeder@lht.dlh.de">janna.schroeder@lht.dlh.de</a>
<b>Kumar Mysore (AEA)</b>	<a href="mailto:kumar.mysore@cargolux.com">kumar.mysore@cargolux.com</a>
<b>Mildred Troegeler (AEA)</b>	<a href="mailto:Mildred.troegeler@aea.be">Mildred.troegeler@aea.be</a>
<b>Lieke Bosua (AEA)</b>	<a href="mailto:Bosua@td.klm.com">Bosua@td.klm.com</a>
<b>Adrie Kraan (US - BOEING)</b>	<a href="mailto:adrie.kraan@boeing.com">adrie.kraan@boeing.com</a>

# Launched Work Packages

## Urgency

### WP1

- Simplified AoA and SEA for Production and Aftermarket Applications

**HIGH**

### WP2

- How should use be defined, and who should apply?

**HIGH**

### WP3

- Develop Risk Mitigations with Authorities

**Medium**

### WP4

- Standardised Communication of alternatives availability for users

**Medium**

- In Aerospace, as a result of the industry regulation focus on product integrity:
  - Fit for purpose alternatives are often not available for all Aerospace uses of a substance, and
  - The impact of non-Authorisation is substantial economically for the industry in any existing production product after the design process is started and also in aftermarket maintenance/repair
- In some previous cases, new regulations only applied to new product applications, in recognition of the above.
  - Where the supply chains are very short and specialist (E.g. Halons)
- Simplified evidence and justification is needed for both Analysis of Alternatives and Socio-Economic Impact to support Authorisation

1. ***Simple and standardised template text*** for use by the industry to support Authorisation application, including test cases of:
  - Analysis of Alternatives
    - ▶ **Where alternatives are not available affecting Production/Aftermarket applications**
  - Socio-Economic analysis
    - ▶ **Where non-availability of alternatives has a direct impact on Production or Maintenance of existing aircraft**
2. A clear scope of application
  - ▶ **e.g. where products post Type Certificate application are impacted**
3. Compatible for use in either
  - Application by end-user (of chemicals and mixtures)
  - Applications made by upstream applicants, where Authorisations may cover a range of product sectors
4. Be supported by:
  - ECHA, to ensure fulfilment of Authorisation requirements
  - EASA, to ensure arguments are supported by EASA regulations

- Individual end-user Authorisation Applications are impractical where:
  - Mixtures are involved
    - ▶ **Authorisation can only flow up one level**
  - Complex products and long supply chains are involved
    - ▶ **Many users of chemicals and mixtures are small companies**
    - ▶ **Many thousands of Authorisation applications may be required**
- End-user Authorisation applications are the most practical solution where a single end-use and a short supply chain is involved
- The way an applied for “use” is described may be dependent on where in the supply chain an application is actually made
- An Authorisation does not, of itself, assure continued supply
- No recommended practice or guidance exists to identify the “right” or recommended practice as to who the applicant should be
- Establishing such practice requires co-operation of actors and trade associations throughout the supply chain



1. A simple document validated with test cases
  - Characterising a range of supply chain structures
  - Identifying in each where in the supply chain application(s) should be made
  - Describing in each how the applied for use should be scoped
    - ▶ **In particular the level of detail to describe the use, and how to manage multiple downstream product sectors (given different positions regarding SEA, Analysis of Alternatives and Authorisation review dates)**
  - Identifying key risks and risk treatments for each scenario
  - Agreed as recommended best practice with a range of trade organisations
  - Published as guidance material on the ECHA web-site
2. An outline proposal of how Downstream applicants might make an Authorisation application on behalf of (perhaps unwilling) upstream companies



- WP1 – Simplified AoA & SEA
  - Final document circulation to Associations mid Feb '14
  - Layout:
    - ▶ **Purpose of this document**
    - ▶ **Airworthiness and the approval process in the aviation industry**
    - ▶ **REACH authorisation requirements**
    - ▶ **AoA: substitution process and lifecycle stage of an aircraft type (legacy, in production, future type)**
    - ▶ **SEA, non-use scenarios**
- WP2 – How should uses be defined, and who should apply?
  - Applications to be made by Manufacturers and Importers of chemicals, and by Formulators
  - Applications by end-users in very few special cases

- WP1 & WP2 deliverables to be merged into a single document
  - Common preamble
  - For publication in ECHA and EASA websites
  - Targeted to REACH authorisation applicants, REACH committees / NGOs

- Maintain a coordination structure
  - Current steering committee's membership, possibly extended
  - New name and revised ToR to be drafted
- New work packages under consideration, ECHA and EASA involvement depending on subjects
  - WP3 – Other risk mitigations
    - ▶ **Develop ToR by end Feb**
  - WP4 – Alternatives Communication
    - ▶ **Industry + EASA**
  - WP5? – Managing Stakeholders in Trialogue
    - ▶ **No WG**
  - WP6? – Public communication issues
    - ▶ **TBD**