



Management of REACH in the Aerospace Sector

***REACH Training Development
Workshop
October 15, 2009***

Current Collaboration on **REACH**



AIA REACH Working Group



Standards Support

- 1) Substance Declaration Standard (SAE & ASD Stan)
- 2) Generic Aerospace uses list

Interpretation & Communication

- 1) Registration usage process & tools
- 2) Article 33 process & tools

IT Tools

- 1) Supply Chain data exchange
- 2) Data attributes

Surveillance of Substances

- 1) Process for Candidate List commenting
- 2) Process for Annex IV & XVII commenting
- 3) Usage exemptions for Authorization

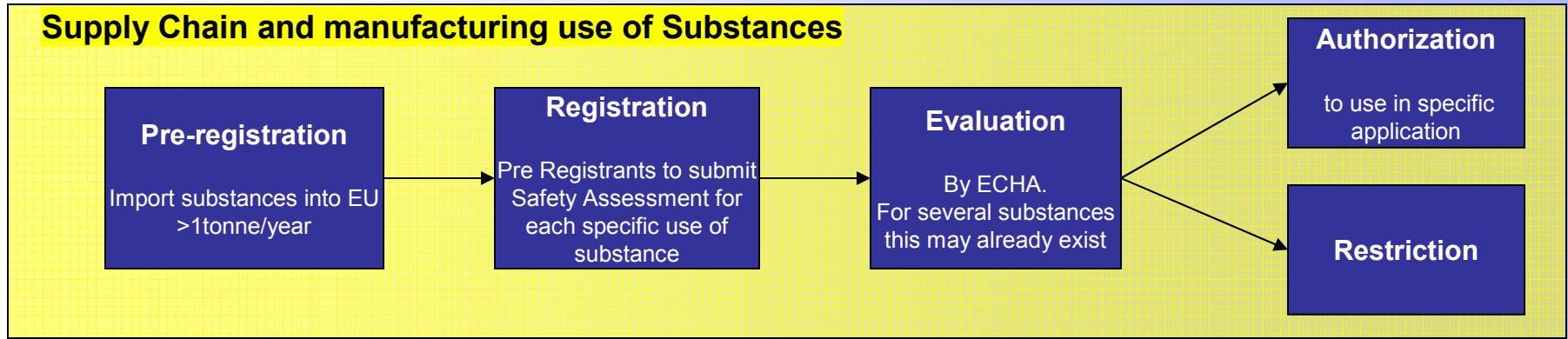
Supplier Communication & Training

- 1) Supplier training and dissemination
- 2) REACH information packets
- 3) Follow-Up

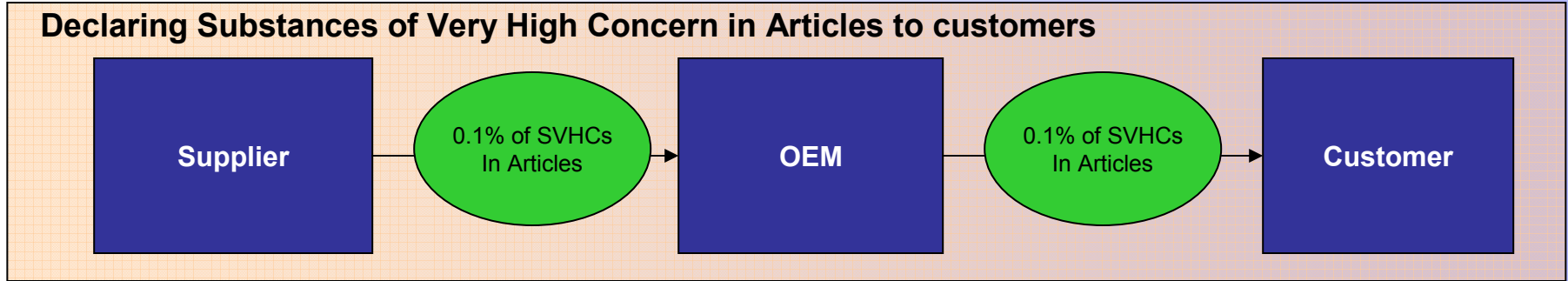
Assessment & Liaison

- 1) AIA/ASD partnering
- 2) REACH conference
- 3) Defense exemptions

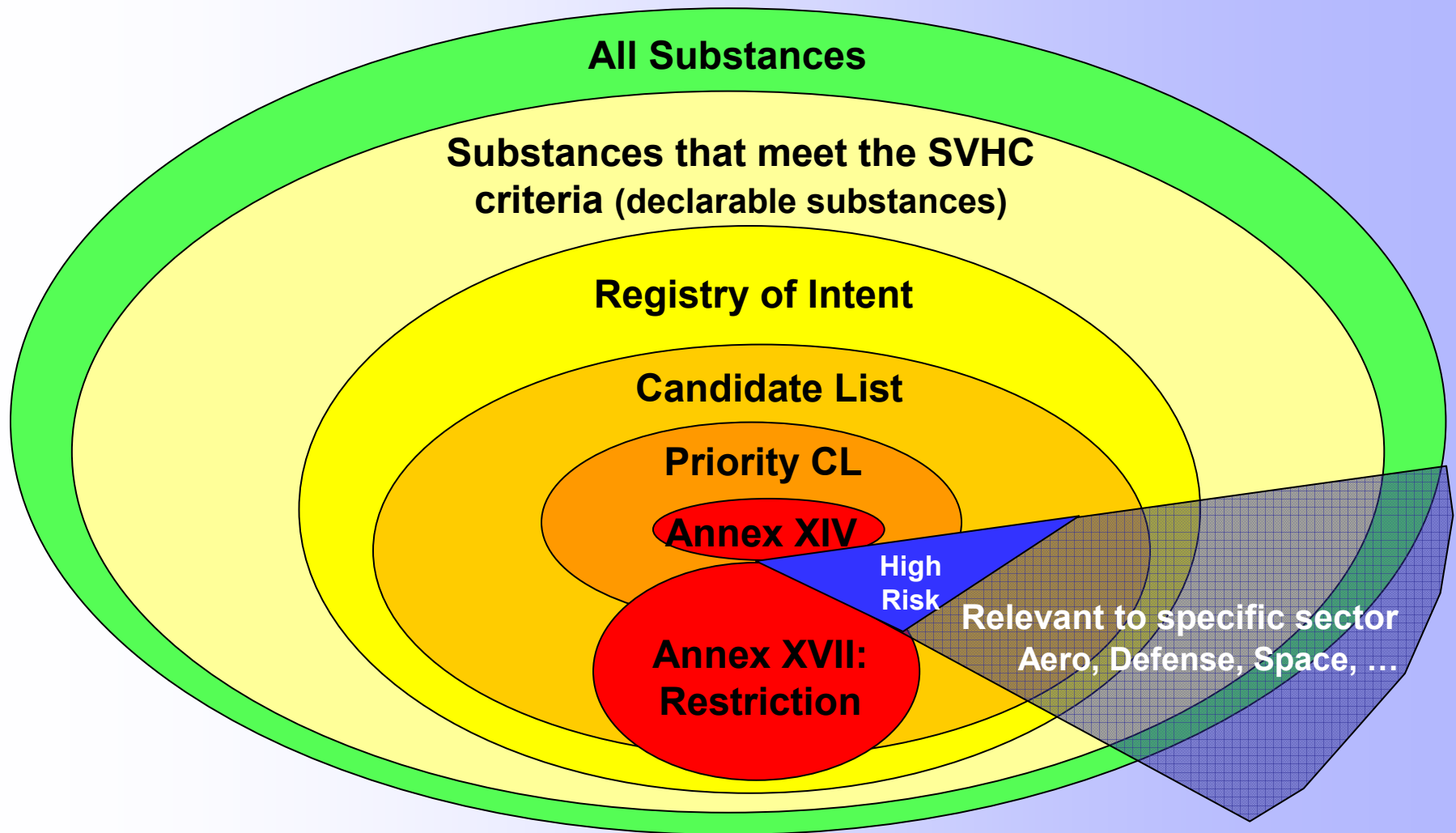
REACH Legal Overview Reminder



Substances of Very High Concern



Substances in our Products and Processes



Information Requirements



- In order to comply with REACH requirements, your customers need detailed information on the presence of Substances of Very High Concern (SVHC) in the components and preparations that you supply
- Your suppliers also have the obligation to provide this information to YOU on SVHCs in ‘articles’ that enter the EU market
- AIA and ASD have developed a process and a form for providing information down the supply chain on substances of interest (declarable substances)
 - Published simultaneously by both ASD-Stan and SAE International

International Standard



Substance Declaration Standard

- This standard was developed to address, in a consistent way, the collection of information on chemicals throughout the supply chain
- This information is key for compliance with numerous regulatory requirements as well as to meet customer and other stakeholders' expectations and obligations
- This standard consists of two components
 - Declaration form
 - Instructions for completing the declaration form
- A standard format will ensure consistency, eliminate duplication of reporting, and facilitate mechanization of data on component chemistry
- It is meant to be used in conjunction with SAE AS9536 / ASD-Stan TR9536 Declarable Substances standard (EK addition)

Substance Declaration Standard



1. Requestor Item #	2. Supplier Item #	3. Supplier Item Name	
0	0	0	
4. Prepared By: *	4a. Preparer's Title	4b. Preparer's Phone*	4c. Preparer's Email*
5. Weight of Item, as Delivered, excludes packaging (Actual weight, not shipping weight -)*	5a. Unit (Drop Down (Lbs / Kg)		
<input type="checkbox"/> Item DOES NOT contain any chemicals listed below in amounts $\geq 0.1\%$ Wt %. Review all the substances found in the Item referenced in this request, and compare them to the CAS #s listed on Tab 5 - TR 9536. Choose the Checked box if this statement is true (Check Box). If this statement is TRUE, there is no need to complete the list on Tab 5 - TR 9536 Detailed List			
	Check box to the left if statement above is true		
<input type="checkbox"/> Item DOES contain chemical(s) listed below in amounts $\geq 0.1\%$ Wt %. Review all the substances in the Item referenced in this request, and compare them to the CAS #s listed on Tab 5 - TR 9536. Choose the Checked box if this statement is true (Check Box). If this statement is TRUE, then Tab 5 - TR 9536 Detailed List, must be completed			
	Check box to the left if statement above is true		
Note: Additional requests for information to your suppliers of chemicals beyond MSDS data may be required to accurately complete this Substance Declaration. Not all substances will be identified on an MSDS. Also, proprietary constituents and % composition ranges listed in an MSDS may not be accurate enough for this declaration. We recommend using this same standard format for those requests down your supply chain.			

Substance Declaration Standard



Format allows substance selection or full disclosure:

8. CAS No.	9. EU Index Number	10. Chemical Name	10a. Chemical Family	11. Weight Percent (For ranges, report typical (mode) value, NOT the range)	12. Will this substance be pre-registered by you or your upstream supplier(s) between 1 June and 20 Nov 2008? If yes, please choose YES from the drop down box corresponding to those substances being declared.
7440-38-2		ARSENIC	FAMAs		
NOCAS0030		ARSENIC COMPOUNDS	FAMAs		
1303-00-0	033-002-00-5	GALLIUM ARSENIDE	FAMAs		
1327-53-3	033-003-00-0	diarsenic trioxide; arsenic trioxide	FAMAs		
1303-28-2	033-004-00-6	diarsenic pentoxide; arsenic pentoxide; arsenic	FAMAs		
10102-49-5	033-005-00-1	Arsenic acid (H3AsO4), iron(3+) salt (1:1)	FAMAs		
10102-50-8	033-005-00-1	Arsenic acid (H3AsO4), iron(2+) salt (2:3)	FAMAs		
10103-50-1	033-005-00-1	Arsenic acid, magnesium salt	FAMAs		
10103-61-4	033-005-00-1	Arsenic acid, copper salt	FAMAs		

Substance Declaration Standard



Completion instructions are included with the form:

	All Cells color-code with GREEN are to be completed by the REQUESTER
	All Cells color-code with BLUE are to be completed by the SUPPLIER
	All Cells color-code with TAN are automatically populated from information completed earlier in the form or from From ARP9536 Detailed List
1	Requestor item number - Information automatically carried over from General Info page (# 7)
2	Supplier item number - Information automatically carried over from General Info page (# 17)
3	Supplier item name - - Information automatically carried over from General Info page (# 18)
4	Preparer's name* - Person who completed the information for this request
4a	Preparer's title - The job title (role) of the person within the supplier organisation who has filled in this
4b	Preparer's phone* - Full international telephone number (for example +44 123 5678910 or ++01 123
4c	Preparer's email* - email address of the preparer
5	Weight of item* - Actual weight of part without packaging
5a	Unit of measure - Is the weight provided in #5 above in Pounds or kilograms? This is a drop-down menu - Please choose the appropriate unit
6	Item Does not contain any chemicals listed below in amounts > 0.1% Wt % - Use weight in #5 above to calculate this weight. Review all the substances found in the Item referenced in this request, and compare them to the CAS #s listed below. Choose the Checked box from the drop down menu if this statement is true. If true, there is no need to continue with Tab 5 (ARP9536 Detailed List). The form can be submitted to the requestor.
7	Item Does contain chemical(s) listed below in amounts > 0.1% Wt % - Use weight in #5 above to calculate this weight. Review all the substances in the Item referenced in this request, and compare them to the CAS #s listed below. Choose the Checked box from the drop down menu if this statement is true. Continue on with the list Tab 5 (ARP9536 Detailed List), and fill in #11- 13 for the appropriate

Declarable Substances Recommended Practice



- This declarable substances list is intended to be used in conjunction with AS9535/ TR9535 to address, in a consistent way, the collection of information on chemicals throughout the supply chain
- This declarable substances list is an approximation of materials of increased regulatory concern
- Some of the substances within this list are either currently regulated or may be regulated when the REACH assessments on the substances are completed
- Members of AIA, ASD, and SAE International compiled a list of all the substances that are known as being officially classified as...

Declarable Substances Recommended Practice



- Carcinogens, Mutagens or Reproductive Toxins [CMRs] category 1&2, according to Annex 1 of Directive 67/548/EEC (as amended)
- Carcinogens, class 1 & 2A, according to the IARC
- Persistent, Bioaccumulative and Toxic [PBT], per the Convention for the Protection of the Marine Environment of the North-East Atlantic (known as the "OSPAR Convention") - Chemicals for Priority Action (Marine Pollutants of the North-East Atlantic) (as amended through HSC(1) 2007)
- Substances defined as Persistent, Bioaccumulative and Toxic [PBT] or very Persistent, very bioaccumulative [vPvB] according to REACH regulation N°1907/2006 Annex XIII; List obtained from ESIS (European chemical Substances Information System)
- Substances called out in REACH Annex XVII
- “Other” chemicals of concern to the aerospace sector
 - i.e. Ozone Depleting Substances [ODS], as defined by Montreal Protocol;
 - Persistent Organic Pollutants [POP], as defined by the Stockholm Convention

Declarable Substances Recommended Practice



Format of the declarable substances list:

8. CAS No.	9. EU Index Number	10. Chemical Name	10a. Chemical Family
7440-38-2		ARSENIC	FAMAs
NOCAS0030		ARSENIC COMPOUNDS	FAMAs
1303-00-0	033-002-00-5	GALLIUM ARSENIDE	FAMAs
1327-53-3	033-003-00-0	diarsenic trioxide; arsenic trioxide	FAMAs
1303-28-2	033-004-00-6	diarsenic pentaoxide; arsenic pentoxide; arsenic	FAMAs
10102-49-5	033-005-00-1	Arsenic acid (H ₃ AsO ₄), iron(3+) salt (1:1)	FAMAs
10102-50-8	033-005-00-1	Arsenic acid (H ₃ AsO ₄), iron(2+) salt (2:3)	FAMAs
10103-50-1	033-005-00-1	Arsenic acid, magnesium salt	FAMAs
10103-61-4	033-005-00-1	Arsenic acid, copper salt	FAMAs
10103-62-5	033-005-00-1	Arsenic acid (H ₃ AsO ₄), calcium salt	FAMAs
102110-21-4	033-005-00-1	Arsenic acid (H ₃ AsO ₄), magnesium salt, manganese-doped	FAMAs
10476-82-1	033-005-00-1	Strychnidin-10-one, compd. with arsenic acid (H ₃ AsO ₄) (1:1)	FAMAs

Declarable Substances



- This new standard was published simultaneously by ASD-Stan and SAE International in March 2008
 - **ASD-Stan**
 - TR9535 – Substance Declaration Standard
 - TR9536 – Declarable Substances Recommended Practice
 - <http://www.asd-stan.org/sales/bookstore.asp>
 - **SAE International**
 - AS9535 – Substance Declaration Standard
 - ARP9536 – Declarable Substances Recommended Practice
 - <http://www.sae.org/standardsdev/declarable.htm>
 - Suppliers have the option to cascade the form
 - Licensing options are available from the standards organization to allow for this cascade

Questions

