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## Enthone REACH Compliance Information - Authorisation

Latest update: July 22, 2011

Ladies and Gentlemen

On June 1st 2007, the so-called REACH regulation was set in force. This regulation, which will restrict the use of hazardous materials, is now entering a decisive phase for the substances chromium trioxide, chromic acid, cobalt (II) sulfate, cobalt (II) nitrate and cobalt (II) chloride. These substances are of great importance for the electroplating industry, but especially customers that need chrome plated parts (hard chromium, decorative chromium plated plastics) and products with zinc and zinc alloy coatings.

**We want to make you aware that your contribution can potentially be decisive for the future availability of these surfaces for a variety of components. According to current situation, usage bans are already possible in about 2 - 3 years, if not separate authorizations for individual applications are requested and granted.**

For the usage of CrO<sub>3</sub>, chromic acid and 5 salts of cobalt, there have been significant changes since June 15 2011.

Important facts:

- June 15 2011 Publication of the draft list to prioritize CrO<sub>3</sub> and 5 major cobalt salts
- September 14 2011 Deadline for submission of comments on the draft list

Afterwards the ECHA will decide which substances will get into the Annex XIV of the REACH regulation. With the listing in Annex XIV, a process begins with the aim to ban the usage of the listed substances. Relevant for the electroplating industry are especially cobalt (II) dichloride, Co (II) dinitrate, Co (II) sulphate as well as chromium trioxide and the Chromic acid. (Spelling taken from ECHA website)

By September 14 2011 it is possible supply arguments to the ECHA (European Chemicals Agency), why the substances mentioned should not be added to the SVHC list (Substances of Very High Concern) (yet). Information regarding the necessity of these materials for your business management / products, the absence of equal quality alternatives, the time necessary for the testing of new layers in terms of function, reliability and manufacturing behavior and the adaptation of corporate standards, and - last but not least - the importance of your product lines the European economy could be of great importance for the near future. For substances listed in Annex XIV, it is required for further usage to receive an authorization for each individual application, which may drastically limit the availability. Already the application for an authorization is very expensive and only possible with a specific socio-economic study on the application. We ask you in your own interest, to visit the ECHA - website and to submit your comments on the respective "commenting forms".

Link:

[http://echa.europa.eu/consultations/authorisation/draft\\_recommendations/recommendations\\_en.asp](http://echa.europa.eu/consultations/authorisation/draft_recommendations/recommendations_en.asp)

Enthone is committed to keep important and not replaceable electroplating processes available. We are also working intensively on the development and testing of alternatives.

For a number of applications Enthone has already developed alternatives. But these are often not yet

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sufficiently tested and not yet included in all corporate standards. This will take - as you know - time. With the inclusion in Annex XIV it is expected that hexavalent chromium processes and cobalt-containing passivation processes for zinc coatings cannot be used any more in many cases from about end of 2013 onwards!

If you are not responsible for REACH within your organization or if there are other interested parties, we ask you to direct this letter further.

For questions please visit the ECHA website. If you do not find the answers, we are happy to assist you further.

Enthone Europe

[http://echa.europa.eu/doc/consultations/recommendations/draft\\_axiv\\_entries\\_summarytable.pdf](http://echa.europa.eu/doc/consultations/recommendations/draft_axiv_entries_summarytable.pdf)

[http://echa.europa.eu/chem\\_data/authorisation\\_process\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process_en.asp)

We hope that this information has been sufficient to answer your questions. If you have any further queries please do not hesitate to contact us.

Kind regards

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