

## INFORMATION

On December 18, 2020, the authorisation for chromium trioxide finally granted five out of six applications applied.

The authorisation numbers which are relevant for our customers will be placed on the labels and safety data sheets.

CTACSub has submitted a substitution plan for use 3 (functional plating with decorative character) to ECHA. CTACSub hopes that use 3 will be authorised in 2021.

### **This now results in the following immediate steps for all Downstream Users:**

<b>Date</b>	<b>Action</b>
March 18, 2021	Authorisation holders create and distribute (as annexes to safety data sheets) specific exposure scenarios for representative processes, operations and individual tasks. Downstream users must implement these exposure scenarios without undue delay.
Around March 22, 2021	DUs MUST report uses to ECHA under article 66 REACH. DUs must also notify their key functions and a justification for the need for key functions to ECHA under article 66 REACH. The information must be provided in the ECHA notification tool (see annex 1).
June 18, 2021	Downstream Users must complete initial measurements of exposure at the workplace and air and waste water monitoring campaigns. The templates to be used for monitoring can be found in the GPS and the safety data sheets of the suppliers.
December 12, 2021	Downstream users shall report to ECHA, within the framework of Article 66, data from measurements of exposure at the workplace and air and waste water monitoring. This should be done as an amendment to the previous Article 66 REACH notification.

## **Please have following information at hand!**

You must submit your Article 66 notification electronically in an online form **provided** by ECHA in its REACH-IT system:

- The name of your company, the address of the sites where the substance is used, and the relevant contact details.
- The substance and the name of the authorised use identified by the number of admissions. The authorisation number can be found on the label and/or the Safety Data Sheets (SDS) that you have received from your product supplier. The Article 66 notification template provides a drop-down list of all authorisation numbers from which you must select one.
- **A brief explanation of key functionalities required for the use of the DU's** (see the key functionalities per substance and use in the texts of the AD and as set out in **Annex 2** and the **related justification why the key functionalities are necessary**). This information must be entered into the Art. 66 ECHA REACH IT tool under the section "*Further description of your use*". Please proceed very carefully and comprehensively when entering this information. Your supplier may be able to assist you in filling in this information.
- If you purchase your substance or formulation from more than one supplier, you must submit as many notifications as the number of your suppliers. In order to avoid double counting of tonnage and workers exposed, you have to, in the case of more than one supplier, split the number of workers exposed and the tonnage received so that the figure is accurate.

Please note down your User-Name and Password when opening the account. Further, you should write down the 'submission number' and print the report of your notification. You will need the submission number for any future notification updates.

**Very important:** Since the authorisations have been granted with conditions, **DUs have to comply with these conditions**. This means that all DUs who rely on the above authorisations **have to conduct annual workers exposure and environmental (air emissions and wastewater) monitoring, and the results of this monitoring must be submitted to ECHA in the Article 66 notification**. For applicable dates, please see **Q&A above**. CTACSub recommend not to submit monitoring data under the Article 66 notification in the initial Article 66 notification but only when DUs have conducted their first measurement campaigns with the new monitoring templates. This can easily be done by an 'update' of the earlier Article 66 notification.

Note that the monitoring data must be uploaded to an appendix to the Article 66 message.

**Further practical guidance** on how to submit your Article 66 REACH notification to ECHA is provided in the following links:

- [ECHA Video tutorial on how to submit a downstream user notification HIGHLY RECOMMENDED!!](https://www.youtube.com/watch?v=N-IGhimWBKs&feature=youtu.be)
- [Downstream user notifications of authorized uses: Information made public by ECHA](https://echa.europa.eu/support/dossier-submission-tools/reach-it/downstream-user-authorized-use)