

**RAC working
group/R/15/2023**

Final

4 May 2023

**Report
of the 15th Meeting of the Committee for Risk Assessment
Working Group on Applications for Authorisation
(RAC AFA working group)**

**(Telakkakatu 6, Helsinki)
via Webex**

**Wednesday 3 May starts at 10.00
Thursday 4 May ends at 18.20**

Summary Record of the Proceedings

1. Welcome and apologies

The Chair, Piotr Sosnowski, welcomed the 33 participants to the 15th Meeting of the Committee for Risk Assessment Working Group on Applications for Authorisation. He informed the group that sections of the meeting would also be chaired by Tim Bowmer, the Chair of RAC and Thierry Nicot.

He reminded all that the working group will be requested to adopt its report at the end of the meeting.

2. Adoption of the Agenda

The Chair introduced the agenda for the meeting (RAC working group/A/15/2023), which was adopted unchanged and is attached to this Report as Annex II.

3. Declarations of conflicts of interests to the Agenda

The Chair requested all participants to declare any potential conflicts of interest to any of the agenda items. One participant declared a potential conflict of interest to the agenda items. The Chairs all declared that they had no potential conflicts of interest related to any of the agenda points of the meeting.

4. Authorisation applications

The recommendations by the working group on draft opinions on the 12 Applications covering 18 uses considered at this meeting are listed in Annex I.

5. AOB

AfA horizontal issues:

The Secretariat presented the state of play of the AfA pipeline, and reminded the WG about working practices, RAC's lines-to-take and RAC's overview table.

One member asked whether ECHA could recommended applicants to provide in their AfA a standard reporting/calculation sheet for the measurements: The Secretariat will continue to advertise the available excel "format for reporting monitoring data by downstream users" and investigate whether it can be technically integrated in the CSR format.

One member also asked how the conformity check is performed. The Secretariat confirmed that the conformity checked is an integral part of the opinion-making process, which includes additional request by the RAC/SEAC to the applicants to provide information to bring the application into conformity.

6. Adoption of the report of the working group

Before the Chair Tim Bowmer thanked the participants and closed the meeting, the working group adopted its report, requesting the Secretariat to make any necessary editorial changes.

Annex I Working group recommendations

Annex II Agenda of the 15th meeting

Annex III List of participants of the 15th Meeting of the Committee for Risk Assessment Working Group on Applications for Authorisation

Annex IV Declarations of potential conflicts of interest

Annex V Standard text for Section 8: monitoring arrangements for the authorisation and Section 9: recommendation for the review report.

Annex I

Working group recommendations

Abbreviations used

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| 4-NPnEO | 4-Nonylphenol, branched and linear, ethoxylated |
| 4-tert-OPnEO | 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated |
| CA | chromic acid |
| CT | chromium (VI) trioxide |
| DtC | dichromium tris(chromate) |
| ERC | environmental release category |
| ES | exposure scenario |
| HvE | Humans via environment |
| LEV | local exhaust ventilation |
| MOCA | 2,2'-Dichloro-4,4'-methylenedianiline |
| OC | operational condition |
| PBT | persistent, bioaccumulative and toxic |
| PPE | personal protective equipment |
| RMM | risk management measure |
| RPE | respiratory protective equipment |
| RR | review report |
| SD | sodium dichromate |
| STP | sewage treatment plant |
| TCE | trichloroethylene |
| WWTP | wastewater treatment plant |
| vPvB | very persistent, very bioaccumulative |

| Summary of the recommendation | Action Points |
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| 1. 285_CT_Liebherr-Aerospace_Linden (2 uses) | |
| <p>Use1: <i>Industrial use of chromium trioxide for functional chrome plating of actuation and landing gear systems for the aviation industry.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - a condition for a vacuum removal of the sludge during irregular cleaning of the bath. <p>The working group supported the draft opinion as proposed by the Rapporteur.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the</p> | <p>Rapporteur together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the</p> |

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| <p>application are appropriate and effective in limiting the risk, provided that they are implemented and adhered to.</p> <p>The working group supported:</p> <p>Section 7: additional conditions for the authorisation</p> <ol style="list-style-type: none"> 1. The applicant shall ensure that appropriate RPE is worn during baths sampling (WCS 5.1), due to the potential for exposure to Cr(VI). The use of RPE could stop if the task starts being performed with an automated system or closed sampling system. 2. The applicant shall ensure that workers perform a 'fit check' of the seal of their respiratory protective equipment (RPE) before taking on relevant tasks and workers shall be trained to do this test adequately. 3. The applicant shall carry out and document a detailed feasibility study on: <ol style="list-style-type: none"> a) the substitution of solid CrO₃ flakes with liquid CrO₃ to further limit exposure; b) the implementation of an automated system to perform the bath adjustment, and the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen. c) the installation of a system that controls continuously the local exhaust ventilation and triggers and appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) plating baths, in case the local exhaust ventilation is not functioning properly). <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | <p>draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.</p> |
| <p>Use2: <i>Industrial use of chromium trioxide for surface treatment of aluminium alloys for applications in the aerospace industries unrelated to functional chrome plating.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - exposure of workers during weighing of the substance and | <p>Rapporteur together with SECR to edit the draft opinion according to</p> |

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| <p>the approach taken by the applicant in the exposure assessment.</p> <p>The working group supported the draft opinion as proposed by the Rapporteur.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk for workers, and are appropriate for humans via the environment.</p> <p>The working group supported:</p> <p>Section 7: additional conditions for the authorisation</p> <ol style="list-style-type: none"> 1. The applicant shall implement without undue delay, technical improvements to the OCs and RMMs at the manual plating lines as well as during weighing of solid CrO₃ and surface treatment of aluminium alloys by brushing or pen-stick, within 12 months of the granting of an authorisation for this use, followed by a measurement campaign to validate the effectiveness of the applied technical improvements. 2. Until the implementation of the additional OCs and RMMs, the applicant shall ensure that workers involved in surface treatment activities (manual plating line and manual brushing) use appropriate RPE, with due consideration for the duration of the tasks and the comfort of the workers during their use. 3. The applicant shall ensure that appropriate RPE is worn during bath sampling due to the increased potential for exposure to CrO₃. The use of RPE could stop if the task starts being performed with an automated system or closed sampling system. 4. The applicant shall ensure that workers perform a 'fit check' of the seal of their RPE before taking on relevant tasks and workers shall be trained to do this test adequately. 5. Without prejudice to points 1, 2, 3 and 4 above, the applicant shall carry out and document a detailed feasibility study on: <ul style="list-style-type: none"> • the substitution of solid CrO₃ flakes with liquid CrO₃ to further limit exposure; • the implementation of an automated system to perform the bath adjustment, and the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen; • the installation of a system that controls continuously the local exhaust ventilation and triggers and appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) plating bath(s), in case the local exhaust ventilation is not functioning properly. <p>The feasibility study shall be concluded within 12 months of the</p> | <p>the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.</p> |
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| <p>granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | |
| 2. 286_CT_Hartchrom-Beck (4 uses) | |
| <p>Use1: <i>Chromium trioxide-based functional chrome plating of axially/rotationally symmetrical components requiring optimal tribological surface properties (resulting from microcracked surface) to ensure low surface friction under lubrication.</i></p> <p>Use 2: <i>Chromium trioxide-based functional chrome plating of axially/rotationally symmetrical components requiring high wear resistant surfaces to withstand abrasive forces occurring in their application</i></p> <p>Use 3: <i>Chromium trioxide-based functional chrome plating of components with complex 3-dimensional geometry (not axially/rotationally symmetrical) requiring optimal tribological surface properties (resulting from microcracked surface) to ensure low surface friction under lubrication</i></p> <p>Use 4: <i>Chromium trioxide-based functional chrome plating of components with complex 3-dimensional geometry (not axially/rotationally symmetrical) requiring high wear resistant surfaces to withstand abrasive forces occurring in their application</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - the wording of the authorisation conditions - the quality of the information provided in the application - the need for site specific monitoring data - the use of RPE by workers, potentially for 8h per day - the wording of the conclusions concerning the hierarchy of the control - the applicants answers to the Rapporteurs questions concerning conditions for authorisation - in Section 7 the Rapporteurs will request full biomonitoring, technical improvements of RMMs according to the hierarchy of control principles and the inclusion in section 7 of the applicants answers to RAC requests related to RMMs - alignment with DOs on AFAs 280_CT_Tecnocrom_Industrial and 273_CT_MikroMetal was discussed. | <p>Rapporteurs together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting.</p> |

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| <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk.</p> <p>The working group recommended that the draft opinion is suitable for general agreement at the RAC plenary.</p> | |
| 3. 287_CT_Bacrom (1 use) | |
| <p>Use1: <i>Industrial use of chromium trioxide for the hard plating of various end-products made of steel for the industry manufacturers to provide hardness, corrosion resistance, low friction coefficient, good surface roughness, thickness, and excellent surface condition.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - availability of limited number of measured worker exposure values and risks to workers - requirement to perform the feasibility study to use liquid chromium trioxide solution as a possibility to link it with the automated concentration adjustments of the chromium baths - functioning of the local exhaust ventilation, alarm system other risk reduction measures in place etc. <p>The working group supported the draft opinions as proposed by the Rapporteur.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk to workers and that the operational conditions and risk management measures related to environmental release minimisation are appropriate and effective in limiting the risk to the general population via the environment.</p> <p>The working group proposed: Section 7: additional conditions for the authorisation</p> <ol style="list-style-type: none"> 1. The applicant shall implement without delay additional OCs and RMMs to reduce the manual intervention for some of the activities near the plating bath (i.e. dipping/immersion of the parts and removal operations in chromium and rinsing baths), to minimise the exposure to Cr(VI) and to eliminate the over-reliance on RPE. 2. The applicant shall implement as planned, the segregation of the loading/unloading area. | <p>Rapporteurs together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.</p> |

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| <p>3. Without prejudice to point 1 above, the applicant shall carry out and document a detailed feasibility study on:</p> <ul style="list-style-type: none"> (a) the substitution of solid CrO₃ by a liquid solution of CrO₃ to further limit exposure; (b) the implementation of an automated system to perform bath concentration adjustment, and the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE; (c) the installation of a system that triggers automatically appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) plating bath(s), in case the local exhaust ventilation is not functioning properly). <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use.</p> <p>In accordance with the conclusion of the feasibility study, OCS and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | |
| 4. 288_CT_Leonardo (1 use) | |
| <p>Use1: <i>Functional chrome plating of military gun barrels and outer jacket surfaces using chromium trioxide.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - the biomonitoring program performed by applicant. <p>The working group supported the draft opinions as proposed by the Rapporteurs.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are generally appropriate and effective in limiting the risk, provided that they are implemented and adhered to.</p> <p>The working group proposed:</p> <p>Section 7: additional conditions for the authorisation</p> | <p>Rapporteurs together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at</p> |

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| <p>The applicant shall carry out and document a detailed feasibility study on:</p> <p>(a) the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE.</p> <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use.</p> <p>In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | <p>the RAC-65 plenary meeting via the A-listing procedure.</p> |
| 5. 289_CT_Beretta (2 uses) | |
| <p>Use1: <i>The use of Chromium trioxide based functional plating of gun barrel bores and auxiliary parts for assault rifles, carbines and pistols for non-civilian uses.</i></p> <p>Use2: <i>The use of Chromium trioxide based functional chrome plating of gun barrel bores and auxiliary parts for semi-automatic shotguns, over/under, side-by-side shotguns, pistols and carbines for civilian uses.</i></p> <p>The working group supported the draft opinions as proposed by the Rapporteurs.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk to workers and general population, provided that they are adhered to.</p> <p>The working group supported:</p> <p>Section 7: additional conditions for the authorisation</p> <p>1. The applicant shall ensure that appropriate RPE is worn during baths sampling (WCS 6), due to the potential for exposure to Cr(VI).</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> | <p>Rapporteurs together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.</p> |

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| <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | |
| <p>6. 290_CT_Fir-Italia (1 use)</p> | |
| <p>Use1: <i>Industrial use of chromium trioxide for the functional chrome plating with decorative character of items for the hydrosanitary sector.</i></p> <p>The working group supported the draft opinions as proposed by the Rapporteurs.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are generally appropriate and effective in limiting the risk, provided that they are implemented and adhered to.</p> <p>The working group proposed: Section 7: additional conditions for the authorisation The applicant shall carry out and document a detailed feasibility study on:</p> <ul style="list-style-type: none"> (a) the substitution of solid CrO₃ by a liquid solution of CrO₃ to further limit the exposure (b) the implementation of an automated system to perform the bath adjustment, and the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE" <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | <p>Rapporteurs together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.</p> |

7. 291_CT_Belloni (1 use)

Use1: *Industrial use of chromium trioxide for the plating of coffee machine parts in contact with water and food.*

The working group discussed:

- appropriateness of the conclusion that OC and RMMs are not appropriate and authorisation conditions considering manual operation, lack of segregation and exposure values.

The working group supported the draft opinion as proposed by the Rapporteurs with agreed changes.

The working group recommends to RAC that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk to workers.

The working group proposed:

Section 7: additional conditions for the authorisation

1. The applicant shall implement without undue delay, technical improvements to the OCs and RMMs at the manual plating lines, followed by a measurement campaign to validate the effectiveness of the applied technical improvements. The additional OCs and RMMs shall be implemented within 12 months of the granting of an authorisation for this use.
2. The applicant shall ensure that workers perform a 'fit check' of the seal, of their respiratory protective equipment (RPE) before taking on relevant tasks and workers shall be trained to do this test adequately.
3. The applicant shall carry out and document a detailed feasibility study on:
 - (a) the substitution of solid CrO₃ flakes by liquid solutions of CrO₃ to further limit exposure;
 - (b) the implementation of an automated system to perform the bath adjustment, and the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE;
 - (c) the installation of a system that controls continuously the local exhaust ventilation and triggers automatically an alarm and appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) plating bath(s)), in case the local exhaust ventilation is not functioning properly.

The feasibility study shall be concluded within 12 months of the

Rapporteurs together with **SECR** to edit the draft opinion according to the discussion of the working group to better justify hard conditions for authorisation.

SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.

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| <p>granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented all across the sites and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | |
| 8. 292_CT_Artech (1 use) | |
| <p>Use1: <i>Industrial use of chromium trioxide for the functional chrome plating with decorative character of steel tubes and plates incorporated in machines for the agri-food industry, leisure, household furniture and automotive industries.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - proposal for hard conditions for the authorisation - use of a glove box to reduce the workers exposure while adjusting concentration in baths by solid Cr(VI). <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are not appropriate and effective in limiting the risk, provided that they are adhered to.</p> <p>The working group proposed:</p> <p>Section 7: additional conditions for the authorisation</p> <ol style="list-style-type: none"> 1. The applicant shall improve the LEV system and/or implement a system that the plating bath is covered during the plating process, to minimize the Cr(VI) concentration nearby the plating bath within 12 months of the granting of an authorisation for this use. 2. The applicant shall ensure that workers perform a 'fit check' of the seal, of their respiratory protective equipment (RPE) before taking on relevant tasks and workers shall be trained to do this test adequately. 3. The applicant shall carry out and document a detailed feasibility study on: <ol style="list-style-type: none"> a) the implementation of an automated or closed system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE; b) the installation of a system that controls continuously the | <p>Rapporteur together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting.</p> |

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| <p>local exhaust ventilation and triggers automatically an alarm and appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) plating bath(s) in case the local exhaust ventilation is not functioning properly.</p> <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for general agreement at the RAC plenary.</p> | |
| 9. 293_CT_Talleres-Aykrom (1 use) | |
| <p>Use1: <i>Industrial use of Chromium Trioxide in functional chrome plating of metallic pieces required in different industrial sectors such as corrugated rolls in order to meet hardness, wear resistance, corrosion resistance, good surface condition, low friction coefficient and coating adhesion requirements.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - operational conditions and risk management measures on the applicant's site - conclusions on the exposure assessment for workers in the draft opinion - conditions for granting an authorisation. <p>The working group requested the rapporteur to update the draft opinion according to the working group discussion.</p> <p>The working group recommended to discuss at the RAC plenary the following points of the draft opinion:</p> <ul style="list-style-type: none"> - conditions for granting an authorisation - an option of a negative opinion. | <p>Rapporteur together with SECR to edit the draft opinion according to the discussion of the working group.</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting.</p> |
| 10. 294_CT_Kludi (2 uses) | |
| <p>Use 1: <i>Functional chrome plating with decorative character of</i></p> | <p>Rapporteur</p> |

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| <p><i>metal and plastic substrates for sanitary applications</i></p> <p>Use 2: <i>Pre-treatment ("etching") of plastic substrates using chromium trioxide in electroplating processes for sanitary applications</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - conditions to request feasibility study on segregation of tasks. <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to.</p> <p>The working group proposed:</p> <p>Section 7: additional conditions for the authorisation</p> <p>1) The applicant shall carry out and document detailed feasibility studies on:</p> <ol style="list-style-type: none"> a) the substitution of solid CrO₃ flakes with liquid CrO₃ to further limit exposure; b) the implementation of an automatic system with liquid CrO₃ solution to perform concentration adjustment of the chromium baths and the implementation of an automated or closed system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE. <p>The feasibility studies shall be concluded within 12 months of granting an authorisation for this use. In accordance with the conclusion of the feasibility studies, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | <p>together with SECR to edit the draft opinion according to the discussion of the working group (to add a feasibility study on segregation of tasks).</p> <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting via the A-listing procedure.</p> |
| <p>11. 295_CT_Ugitech (1 use)</p> | |
| <p>Use1: <i>Industrial use of chromium trioxide for the functional chrome plating of stainless-steel bars, mainly designed to be cylinder rods, used in aggressive and corrosive environments in diverse sectors such as transportation.</i></p> | <p>SECR to schedule the draft opinion for agreement at</p> |

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| <p>The working group supported the draft opinion as proposed by the Rapporteur.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to.</p> <p>The working group proposed:</p> <p>Section 7: additional conditions for the authorisation</p> <p>The applicant shall carry out and document a detailed feasibility study on:</p> <ul style="list-style-type: none"> a) the implementation of an automated or closed system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE; b) the installation of a system that controls continuously the local exhaust ventilation and triggers automatically an alarm and appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) plating bath(s) in case the local exhaust ventilation is not functioning properly. <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended that the draft opinion is suitable for consideration via the A-listing procedure.</p> | <p>the RAC-65 plenary meeting via the A-listing procedure.</p> |
| 12. 296_CT_Mahle (1 use) | |
| <p>Use1: <i>Chromium trioxide use: Chromium-trioxide-based functional chrome plating of piston rings for automotive applications.</i></p> <p>The working group discussed:</p> <ul style="list-style-type: none"> - representativeness of measurements of workers exposure in short tasks - the feasibility study on the substitution of solid CrO₃ flakes by liquid solutions of CrO₃. The working group reflected on the possibility to implement automated/closed dilution | <p>Rapporteur together with SECR to edit the draft opinion according to the discussion of the working group.</p> |

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| <p>system as an alternative to substitute solid CrO₃ flakes by liquid solutions.</p> <p>The working group supported the draft opinion as proposed by the Rapporteurs.</p> <p>The working group recommends to RAC that the operational conditions and risk management measures described in the application are appropriate and effective in limiting the risk, provided that they are adhered to.</p> <p>The working group proposed:</p> <p>Section 7: additional conditions for the authorisation</p> <p>The applicant shall carry out and document a detailed feasibility study for</p> <ol style="list-style-type: none"> the substitution of solid CrO₃ flakes by liquid solutions of CrO₃ to further limit exposure under WCS 5 the implementation of an automated system to perform the bath adjustment, and the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently rely on the use of PPE the 4 day process of tank cleaning/desludging tasks performed under WCS 6, to implement additional measures to reduce further the exposure of workers, considering the hierarchy of control principles, such as improved cleaning practices to minimise the exposure to Cr(VI) (e.g., reduce it to Cr(III) before workers can enter/access the bath to remove the sludge and remaining liquid). <p>The feasibility study shall be concluded within 12 months of the granting of an authorisation for this use. In accordance with the conclusion of the feasibility study, OCs and RMMs to further reduce workplace exposure to Cr(VI) to as low a level as technically and practically feasible must be implemented and reviewed during the review period.</p> <p>Section 8: monitoring arrangements for the authorisation as given in Annex V, only points 1-6.</p> <p>Section 9: recommendations for the review report as given in Annex V.</p> <p>The working group recommended to discuss at the RAC plenary following points of the draft opinion:</p> <ul style="list-style-type: none"> conditions on feasibility studies in Section 7 a. and b. | <p>SECR to schedule the draft opinion for agreement at the RAC-65 plenary meeting</p> |
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Annex II

3 May 2023
RAC WG/A/15/2023
Final

Agenda

**Meeting of the Committee for Risk Assessment Applications for
Authorisation Working Group
(RAC AFA WG) reporting to RAC-65**

**3 - 4 May 2023
WebEx meeting**

**Wednesday 3 May starts at 10.00
Thursday 4 May ends at 18.20
*Times are Helsinki times***

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

***RAC WG/A/15/2023
For adoption***

Item 3 – Declarations of conflicts of interest to the Agenda

Item 4 – Authorisation applications

1. 285_CT_Liebherr-Aerospace_Linden
2. 286_CT_Hartchrom-Beck
3. 287_CT_Bacrom
4. 288_CT_Leonardo
5. 289_CT_Beretta
6. 290_CT_Fir-Italia
7. 291_CT_Belloni
8. 292_CT_Artech
9. 293_CT_Talleres-Aykrom
10. 294_CT_Kludi
11. 295_CT_Ugitech
12. 296_CT_Mahle

For discussion

Item 5 – AOB

1. AfA horizontal issues

For discussion

Item 6 – Adoption of the Report from the WG

For discussion and adoption

Declaration of potential conflicts of interest

The following participants, including those for whom the Chair declared the interest on their behalf, declared potential conflicts of interest with the Agenda items (according to Art 9 (2) of RAC RoPs)

| AP/Dossier / DS | RAC Member | Reason for potential CoI / Working for |
|--|--------------|--|
| ALREADY DECLARED AT PREVIOUS RAC AFA WORKING GROUP MEETING(S) | | |
| Applications for Authorisation | | |
| All chromates | Urs SCHLUTER | Institutional & personal involvement; asked to refrain from voting in the event of a vote on this group of substances - other mitigation measures may be applied by the Chair. |

Standard text for Section 8: monitoring arrangements for the authorisation and Section 9: recommendation for the review report.

Section 8: monitoring arrangements for the authorisation

1. The applicant shall implement the following monitoring programmes for Cr(VI):
 - (a) Occupational inhalation exposure monitoring programmes, which shall:
 - (i) be conducted at least annually. The frequency of the measurements should be sufficient to capture any potential increase in exposure of workers to Cr(VI).
 - (ii) be based on relevant standard methodologies or protocols;
 - (iii) ensure a sufficiently low limit of quantification;
 - (iv) comprise personal and/or static inhalation exposure sampling;
 - (v) be representative of:
 - a. the full range and duration of tasks undertaken where exposure to Cr(VI) is possible;
 - b. the OCs and RMMs typical for each of these tasks;
 - c. the number of workers potentially exposed;
 - (vi) include contextual information about the tasks performed during sampling.
 - (b) Environmental releases:
 - (i) the applicant shall continue conducting their (or “implement a”) monitoring programme for Cr(VI) emission to wastewater;
 - (ii) the applicant shall conduct air emission measurements at least annually or more frequently following any possible changes in the process;
 - (iii) the monitoring programmes for wastewater and air emissions shall:
 - a. be based on relevant standard methodologies or protocols; and
 - b. be representative of the OCs and RMMs used at the applicant’s site.
 - c. ensure a sufficiently low limit of quantification.
2. The information gathered via the measurements referred to in paragraph 1 and related contextual information shall be used annually by the applicant to confirm the effectiveness of the RMMs and OCs in place and, if needed, to introduce measures to further reduce workplace exposure to Cr(VI) and emissions to the environment to as low a level as technically and practically feasible. While doing so, the applicant shall also review and, if needed, update their assessment of the combined exposure for the different groups of workers.
3. The applicant shall use the monitoring results to further ensure that the application of RMMs at their site is in accordance with the hierarchy of control principles.
4. The information from the monitoring programmes referred to in paragraph 1, including the contextual information associated with each set of measurements as well as the outcome and conclusions of the review and any action taken in accordance with paragraph 2, shall be documented, maintained and be made available by the applicant, upon request, to the competent national authority of the Member State where the authorised use will take place.

5. The applicant may reduce the frequency of measurements, once they can demonstrate to the competent authority of the Member State where the use takes place, that exposure of humans (i.e. workers and general population) has been reduced to as low a level as technically and practically possible and that the risk management measures and operational conditions corresponding to the specific exposure scenarios developed in the chemical safety report function appropriately.
6. Where the frequency of a monitoring programme has been reduced in accordance with paragraph 5, any subsequent changes to the operational conditions or risk management measures that may affect the exposure of workers and humans via the environment at each of the sites where the use takes place shall be documented. The applicant shall assess the impact of such changes by monitoring to demonstrate that exposure of workers and humans via the environment to be reduced to as low a level as technically and practically possible
7. The applicant shall continue their existing [annual] biomonitoring programme for the workers potentially exposed to Cr(VI).

Section 9: recommendation for the review report.

The results of the feasibility study as mentioned in section 7 and the measurements referred to in section 8.1 as well as the outcome and conclusions of the review and any actions taken in accordance with section 8.1 should be documented and included in any subsequent authorisation review report