RAC working group/R/17/2023

Final

11 October 2023

Report
of the 17th Meeting of the Committee for Risk Assessment Working Group on Applications for Authorisation (RAC AfA working group)

(Telakkakatu 6, Helsinki)
via WebEx

Tuesday 10 October starts at 10.00
Wednesday 11 October ends at 17.30

Summary Record of the Proceedings

1. Welcome and apologies

The Chair, Piotr Sosnowski, welcomed the 33 participants to the 17th 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 Arnis Ludboržs, Roberto Scazzola and Thierry Nicot.

He reminded all that the working group has been established based on the RAC Mandate and the purpose of the working group meeting is to discuss AfA cases and to provide recommendations to RAC if they can be agreed via the A-listing procedure or if they require discussion during the plenary. This allows to save time and discuss in the plenary only more complex issues. He reminded 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/17/2023), 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. Declaration of a potential conflict of interest to the agenda items by one participant was added to Annex IV (declared at previous meetings). 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 14 Applications covering 15 uses considered at this meeting are listed in Annex I.

5. Any other business

Horizontal issues:

The Secretariat presented the state of play of the AfA pipeline and how the Secretariat intends to process the AfAs in 2024 while preparing a Restriction proposal for the uses of certain chromium compounds. In this context the Commission will publish soon a questions and answers document.

The Secretariat also reminded the working group about the conformity check performed by RAC and SEAC during the opinion-making process, and about the tips presented in RAC 66 to streamline the opinion making by RAC (including consideration on a consistent way of representing numbers in terms of digits).

6. Adoption of the report of the working group

Before the Chair Roberto Scazzola 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 17th meeting**

Annex III **List of participants of the 17th 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

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
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
WWTP	wastewater treatment plant
vPvB	very persistent, very bioaccumulative

Summary of the recommendation	**Action Points**
1. 311_SD_Liebherr-Aerospace (1 use)	
Use1: *Industrial use of sodium dichromate for the sealing after anodizing of aluminium alloys and passivation of metallic coatings of actuation and landing gear system parts for the aviation industry that meet the airworthiness certification requirements.* The working group discussed: - workers exposure values during the weighing process (WCS 2), - conditions for the authorisation regarding the use of RPE and use of disposable protection clothes, - monitoring arrangements for the authorisation. The working group supported the draft opinion as proposed by the Rapporteur. 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.	**Rapporteur** together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via

Regarding the reproductive hazards associated with the use of sodium dichromate, the working group recommends to RAC that the risk assessment presented in the application demonstrates adequate control of risk from the use applied for, provided that the operational conditions and risk management measures described in the application are adhered to. The working group recommends to RAC that the OCs and RMMs related to environmental release minimisation are appropriate and effective in limiting the risk to the general population via the environment. The working group supports: Section 7: additional conditions for the authorisation 1. The applicant shall implement technical improvements to the OCs and RMMs during weighing of solid SD (e.g. installation of LEV in room where weighing is performed), 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. The applicant shall ensure that workers involved in surface treatment activities and bath sampling use appropriate RPE, with due consideration for the duration of the tasks and the comfort of the workers during their use. The use of RPE could stop if the additional technical improvements to the OCs and RMMs (e.g. physical separation between the loading/unloading working area and the treatment lines, removal of the workers from the plating area through remote operations of hoists, automated system or closed sampling system etc.) will be implemented at the site. 3. 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. 4. Without prejudice to points 1, 2 and 3 above, the applicant shall carry out and document a detailed feasibility study on: • the replacement of solid SD crystals by a liquid solution of SD, or the implementation of a closed/automated system to perform the dilution of solid SD (e.g. a glove box to transfer flakes to a mixing tank) and any subsequent refilling of the baths with liquid solutions (e.g. fix-piping from the containers or mixing tanks, to the baths); • the implementation of a closed/automated system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen; • the installation of a physical separation between the treatment lines and loading/unloading areas; • the installation of a LEV system that triggers automatically appropriate and effective measures to reduce the exposures to workers (e.g. the shutdown of the relevant Cr(VI) treatment bath(s), in case the local exhaust ventilation is not functioning properly).	the A-listing procedure.

The feasibility studies 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	
2. 312_CT_Metalplast (2 uses)	
Use1: *Industrial use of hexavalent chromium for a pre-treatment step (etching) in the electroplating process for plastic materials with various applications.* **Use2:** *Industrial use of chromium trioxide for plating on plastic materials to create a long-lasting high durability chromium decorative surface in the electroplating process for various applications.* The working group discussed: - manual etching and related concerns at the Metalplast site, conclusion on RMMs and OCs, - feasibility study versus hard conditions to automatise the dipping process at the Metalplast site, - lack of an emissions abatement system (e.g. a wet scrubber) for the chimney at the CO.BE site for both uses and the consequences and related changes in the draft opinions, - separation of conclusions on RMMs and OCs for HH and HvE (not appropriate for HvE). The working group recommends that the draft opinion is suitable for general discussion (with emphasis to the possible automatisation of the process) and agreement at the RAC plenary.	**Rapporteur** together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for discussion and agreement at the RAC-67 plenary meeting.
3. 313_CT_BWI-Poland (1 use)	
Use1: *Industrial use of chromium trioxide for the functional chrome plating of shock absorber rods and strut rods, cylinders*	**Rapporteurs** together with

and reservoir tubes mounted on passive or semi-active dampers for automotive applications. The working group discussed: - number of operation days a year of the plating lines, - semi-closed system for sampling, - high limit of quantification of the analytical method used by the applicant for long-term worker exposure measurements, - irregular tasks by the workers, - relatively prolonged use of RPE by the workers. The working group supported the draft opinion as proposed by the Rapporteurs. 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. The working group supports: Section 7: additional conditions for the authorisation The applicant shall carry out and document a detailed feasibility study on: (a) the replacement of solid CrO_3 flakes by a liquid solution of CrO_3, or the implementation of a closed/automated system to perform the dilution of solid CrO_3 (e.g. a glove box to transfer flakes to a mixing tank) and any subsequent (re-)filling of the baths with liquid solutions (e.g. fix-piping from the containers or mixing tanks, to the plating baths) (b) the implementation of a closed/automated system to perform bath sampling tasks (for the FIAMMA line), 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 or/the shutdown of the plating operation, in case the local ventilation is not functioning properly (for the FIAMMA line). 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report The results of the feasibility study and actions as mentioned in section 7 and the measurements referred to in section 8.1 as	**SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.

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. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	
4. 314_CT_Benoni (1 use)	
Use 1: Functional chrome plating of mechanical components (including hydraulic cylinders, columns, moulds and various machinery parts) using chromium trioxide. The working group discussed: - possible combined exposure to HvE. The working group supported the draft opinion as proposed by the Rapporteur. 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 for both sites and not appropriate and effective in limiting the risk to the general population at the Cristofoletti site. The working group supports: Section 7: additional conditions for the authorisation 1. The applicant shall implement, without delay technical improvements to the OCs/RMMs (e.g. improvement of the LEV functioning, covering the bath during the plating process, segregation of parts preparation, etc) to minimize the Cr(VI) concentration nearby the plating bath and reduce workers' exposure to Cr(VI) at both sites. These shall be implemented within 12 months of the granting of an authorisation for this use and be followed by a measurement campaign to validate the effectiveness of the applied technical improvements. 2. The applicant shall take further action related to the air emissions of the Cristofoletti site: • The applicant shall carefully analyse the results of the measurement campaign carried out in 2023 and recalculate the release factor for the air of the Cristofoletti site. ○ A release factor of a same level of magnitude or lower than the one derived for the Benoni site shall be achieved; ○ If the release factor is not of the same order of	**Rapporteur** together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.

magnitude or lower than for Benoni, the applicant shall conduct a root cause analysis for the difference and implement immediately appropriate actions to improve the situation in terms of achieving a higher level of efficiency of the applied OCs and RMMs at the site for air release control. If necessary, additional RMMs shall be implemented to further reduce these releases to as low a level as technically and practically feasible. ○ Control measurements shall be conducted to confirm the impact of any action. The "control measurement – analysis – action" cycle shall be continued until a release factor of the same level of magnitude or lower than Benoni is achieved. 3. The applicant shall carry out and document a detailed feasibility study on: (a) the replacement of solid CrO_3 flakes by a liquid solution of CrO_3, or the implementation of a closed/automated system to perform the dilution of solid CrO_3 (e.g. a glove box to transfer flakes to a mixing tank) and any subsequent (re-)filling of the baths with liquid solutions (e.g. fix-piping from the containers or mixing tanks, to the plating baths) (b) 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 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report The results of the feasibility study and actions as mentioned in section 7 and the measurements referred to in section 8.1 paragraph 1 and 7, as well as the outcome and conclusions of the review and any actions taken in accordance with section 8.1 paragraph 2, should be documented and included in any subsequent authorisation review report. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	
5. 315_CT_Egal (1 use)	
Use1: *Industrial use of chromium trioxide for the pre-treatment*	**Rapporteur**

step (etching) in the electroplating process of small sized plastic items for various sectors. The working group discussed: - LEV: effectiveness of the mobile capturing hood, - static sampling used for exposure assessment. The working group supported the draft opinion as proposed by the Rapporteur. 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 implemented and adhered to. The working group supports: Section 7: additional conditions for the authorisation 1. The applicant shall carry out and document a detailed feasibility study on: a) the implementation of a physical segregation of the etching tank (as planned by the applicant); b) 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 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure if no changes in the draft opinion after an additional consultation with the applicant.	together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure (unless changes in the draft opinion).
6. 316_CT_ASO-Cromsteel (1 use)	
Use1: *Chromium trioxide based functional chrome plating of semi-finished steel products (bars, cylinder tubes and linear shafts) for the manufacture of hydraulic and pneumatic components.* The working group discussed:	**Rapporteur** together with **SECR** to edit the draft opinion according to

- RAC calculation of the stated effectiveness values for environmental RMMs to air, - individual excess risk level for HVE. The working group supported the draft opinion as proposed by the Rapporteur. 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. The working group supports: Section 7: additional conditions for the authorisation The applicant shall carry out and document a detailed feasibility study on: (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 (at both sites); (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 (at the Romanian site). 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.
7. 317_CA_Micron (1 use)	
Use1: *Dilution of chromic acid solution at concentrations lower than 0.1% for the use in passivation baths.* The working group supported the draft opinion as proposed by the Rapporteur.	**SECR** to schedule the draft opinion for agreement at

The working group recommends to RAC that the operational conditions and risk management measures described in the review report are appropriate and effective in limiting the risk, provided that they are implemented and adhered to. The working group supports: Section 7: additional conditions for the authorisation None Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	the RAC-67 plenary meeting via the A-listing procedure.
8. 318_CT_Sirio_Galv (1 use)	
Use1: *Industrial use of Chromium Trioxide for the functional chrome plating with decorative character for different applications.* The working group discussed: - calculations of workers exposure, - representativeness of static measurements for specific tasks, - if the combined exposure can be validated by static measurements, - wording of the authorisation condition concerning LEV control. The working group supported the draft opinion as proposed by the Rapporteurs. 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 implemented and adhered to. The working group supports: Section 7: additional conditions for the authorisation 1. Following the applicant's commitment as showed in the response to the question from RAC, the applicant shall implement, without delay: • a LEV flow controller connected to a visual and audible alarm to alert in case of suction interruption or flow decrease, • a shutdown system of the chrome plating part of the process	**Rapporteurs** together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.

in case anomalies are detected by the of LEV flow controller. 2. The applicant shall carry out and document a detailed feasibility study on: (a) the replacement of solid CrO_3 flakes by a liquid solution of CrO_3, or the implementation of a closed/automated system to perform the dilution of solid CrO3 (e.g. a glove box to transfer flakes to a mixing tank) and any subsequent (re-)filling of the baths with liquid solutions (e.g. fix-piping from the containers or mixing tanks, to the plating baths) (b) 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 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	
9. 319_CT_SK-Nexilis (1 use)	
Use1: *Chromium trioxide use: Manufacture of passivated copper foil used in Lithium-ion batteries (LiB).* The working group discussed: - additional conditions for the authorisation in consideration of the future use and whether to replace feasibility study by hard conditions. The working group considered that the operational conditions and risk management measures described in the application are expected to be not appropriate and effective in limiting the risk. The proposed additional conditions for the authorisation are expected to result in operational conditions and risk management measures that are appropriate and effective in limiting the risk, provided that they are implemented and adhered to. The working group supports: Section 7: additional conditions for the authorisation	**Rapporteur** together with **SECR** to edit the draft opinion according to the discussion of the working group and provide proper justification of the changes. **SECR** to schedule the

The applicant shall: - implement a closed/automated system to perform the dilution of solid CrO_3 (e.g. a glove box to transfer flakes to a mixing tank). - implement of a closed/automated system to perform make-up tank sampling tasks; - install 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) passivation bath(s), in case the local exhaust ventilation is not functioning properly). Section 8: monitoring arrangements for the authorisation as given in Annex V with following adjustments: 1. The applicant shall implement the following monitoring programmes: a) Occupational inhalation exposure monitoring programmes for Cr(VI), which shall: • (i) be conducted within 3 months after the plant starts to be operational, and at least annually afterwards, for the workers exposed to Cr(VI). The frequency of the measurements should be sufficient to capture any potential increase in exposure of workers to Cr(VI) *[….]* b) Environmental releases: • (i) the applicant shall conduct monitoring programme for Cr(VI) emission to air and wastewater within 3 months after the plant starts to be operational, and at least annually afterwards *[….]* Section 9: recommendations for the review report as given in Annex V. The working group recommends discussing at the RAC plenary following points of the draft opinion: - overall conclusions on operational conditions and risk management measures as not appropriate and effective, - Section 7: additional conditions for the authorisation.	draft opinion for discussion and agreement at the RAC-67 plenary meeting.
10. 320_CT_Fratelli-Creola (1 use)	
Use 1: *Use of chromium trioxide for electroplating of metal substrates with the purpose to creating a long-lasting high durability surface with bright (shiny) or matte look for sanitary and industrial applications.* The working group discussed: - consistency between draft opinions concerning the	**Rapporteurs** together with **SECR** to edit the draft opinion according to the

calculation of workers exposure based on modelled data and static measurements, - effectiveness of implementation of an additional LEV system. The working group supported the draft opinion as proposed by the Rapporteurs. 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 implemented and adhered to. The working group supports: Section 7: additional conditions for the authorisation 1. The applicant shall carry out and document a detailed feasibility study on: (a) the replacement of solid CrO_3 flakes by a liquid solution of CrO_3, or the implementation of a closed/automated system to perform the dilution of solid CrO_3 (e.g. a glove box to transfer flakes to a mixing tank) and any subsequent (re-)filling of the baths with liquid solutions (e.g. fix-piping from the containers or mixing tanks, to the plating baths), (b) the implementation of an additional LEV system nearby the chromium tank, as planned by the applicant, which consists of a movable arm capturing system, to minimize the spreading of Cr(VI), (c) 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 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.
11. 321_CT_LMC (1 use)	

Use1: *Industrial use of chromium trioxide for the functional chrome plating of food slicer's circular blades.* The working group discussed: - high exposure data for workers (due to the conservative approach by the applicant), - request to the applicant to cover baths, their answer and how it should be reflected in the draft opinion. The working group supported the draft opinion as proposed by the Rapporteur. The working group recommends to RAC that 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. The working group supports: Section 7: additional conditions for the authorisation The applicant shall carry out and document a detailed feasibility study on: 1. the implementation of an automated or closed system to perform bath sampling tasks, where exposure to Cr(VI) is foreseen and which currently relies on the use of PPE. 2. the physical segregation of the plating area (as per the applicant's commitment). 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	**Rapporteur** together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.
12. 322_CT_ArcelorMittal_plating (1 use)	
Use1: *Industrial use of chromium trioxide for functional chrome plating of work rolls for use in the production of flat metal products.* The working group supported the draft opinion as proposed by the	**SECR** to schedule the draft opinion for agreement at

Rapporteur. 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. The working group supports: Section 7: additional conditions for the authorisation 1. 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. 2. The applicant shall carry out and document a detailed feasibility study on 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. 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable for consideration via the A-listing procedure.	the RAC-67 plenary meeting via the A-listing procedure.
13. 323_CT_HDO-Druckguss (1 use)	
Use1: *Electroplating (by a long-term contractual supplier) of metal substrates using chromium trioxide to achieve functional surfaces with decorative character.* The working group discussed: - cleaning procedure of sludge removal from baths and related workers exposure, - acceptable LOQ values, - limited (not sufficient) number of measurements of emissions to the air (one year only) and workers exposure and how it should be reflected in the draft opinion. The working group supported the draft opinion as proposed by the	**Rapporteurs** together with **SECR** to edit the draft opinion according to the discussion of the working group. **SECR** to schedule the

Rapporteurs. 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 implemented and adhere to. The working group supports: Section 7: additional conditions for the authorisation The applicant shall carry out and document a detailed feasibility study on: (a) the replacement of solid CrO_3 flakes by a liquid solution of CrO_3, or the implementation of a closed/automated system to perform the dilution of solid CrO_3 (e.g. a glove box to transfer flakes to a mixing tank) and any subsequent (re-)filling of the baths with liquid solutions (e.g. fix-piping from the containers or mixing tanks, to the plating baths); (b) the implementation of an automated system to perform the 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 (at both sites). 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group conditionally recommends that the draft opinion is suitable for consideration via the A-listing procedure. Rapporteurs are requested to check if the workers are going inside the baths during the cleaning procedure and if necessary to add relevant feasibility study.	draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.
14. 324_CT_Tecnofiniture (1 use)	
Use1: *Industrial use of chromium trioxide for the hard-chrome plating of a wide variety of items with large dimensions and complex geometries used in energy generation and supply, off-shore oil and gas extraction and manufacturing industries.* The working group discussed: - effectiveness of the LEV system placed above the plating	**Rapporteurs** together with **SECR** to edit the draft opinion according to the

bath, - the condition for the authorisation of covering of the bath, - the request to perform feasibility study on implementation of a closed/automated system to perform the bath adjustment. The working group supported the draft opinion as proposed by the Rapporteurs. 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. The working group supports: 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 and the plating bath (e.g., improvement of the LEV functioning, covering the bath during the plating process, etc.) to minimize the Cr(VI) concentration nearby the plating bath and the area where plated items are prepared. These shall be implemented within 12 months of the granting of an authorisation for this use and be followed by a measurement campaign to validate the effectiveness of the applied technical improvements. 2. The applicant shall carry out and document a detailed feasibility study on: (a) The implementation of a closed/automated system to perform the bath adjustment, (b) 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 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. Section 8: monitoring arrangements for the authorisation as given in Annex V. Section 9: recommendations for the review report as given in Annex V. The working group recommends that the draft opinion is suitable	discussion of the working group. **SECR** to schedule the draft opinion for agreement at the RAC-67 plenary meeting via the A-listing procedure.

for consideration via the A-listing procedure.	

Annex II

10 October 2023
RAC WG/A/17/2023
Final

Agenda

Meeting of the Committee for Risk Assessment Applications for Authorisation Working Group (RAC AFA WG) reporting to RAC-67

10 - 11 October 2023

WebEx meeting

Tuesday 10 October starts at 10.00
Wednesday 11 October ends at 17.40

Times are Helsinki times

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

RAC WG/A/17/2023
For adoption

Item 3 – Declarations of conflicts of interest to the Agenda

Item 4 – Authorisation applications

1. 311_SD_Liebherr-Aerospace
2. 312_CT_Metalplast
3. 313_CT_BWI-Poland
4. 314_CT_Benoni
5. 315_CT_Egal
6. 316_CT_ASO-Cromsteel
7. 317_CA_Micron
8. 318_CT_Sirio_Galv
9. 319_CT_SK-Nexilis
10. 320_CT_Fratelli-Creola
11. 321_CT_LMC
12. 322_CT_ArcelorMittal_plating
13. 323_CT_HDO-Druckguss

For discussion

Item 5 – AOB

1. AfA horizontal issues

For discussion

Item 6 – Adoption of the Report from the WG

For discussion and adoption

Annex III

List of participants of the 17th Meeting of the RAC AFA working group

RAC Members
Angeli Karine
Barański Boguslaw
Brovkina Julija
Chiurtu Elena (co-opted)
Deviller Geneviève (co-opted)
Docea Anca
Geoffroy Laure
Kadikis Normunds
Karadjova Irina
Leinonen Riitta
Menard Srpčič Anja
Moldov Raili
Murray Brendan
Schlüter Urs
Tekpli Nina Landvik
Užomeckas Žilvinas
Van der Haar Rudolf (co-opted)
Viegas Susana

Members' advisers
Beetstra Renske (adv. to Gerlienke Schuur)
Dumke Carolin (adv. to Urs Schlüter)
Granato Giuseppe (adv. to Dania Esposito)
Jankowska Agnieszka (adv. to Beata Peczkowska)
Moilanen Marianne (adv. to Riitta Leinonen)
Panieri Emiliano (adv. to Dania Esposito)
Seba Julie (adviser to Wendy Rodriguez)

RAC Regular Stakeholders
Janosi Amaya

European Commission
Fabbri Marco
Jezso Veronika
Kusendila Christophe
Roebben Gert

ECHA
Atanasova Marina
Etholen Anita
Hammer Jort
Henrichson Sanna
Lehto Hürlimann Mikko
Lisboa Patricia
Loukou Christina
Ludborzs Arnis
Nicot Thierry
Niemelä Helena
Mäkelä Petteri
Peltola Jukka
Pillet Monique
Portugal Laura
Regil Pablo
Richarz Andrea
Roberts Julian
Salo Marta
Scazzola Roberto
Schakir Yasmin
Sosnowski Piotr
Tarvainen Emma
Väänänen Virpi

Lemetayer Loreleï	

Annex IV

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.

Annex V

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 0population) 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 continues 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