



AIA REACH Working Group Update

ASETS Defense Sustainable Surface Engineering

August 27-30, 2012

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Report Documentation Page

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- **Chair:** *Sally Gestautas, Raytheon*
- **Vice Chair:** *Christina Simon, Lockheed Martin*
- **Membership:** 40 members from 23 Companies
- **Communication:**
 - Annual Face to Face Meetings
 - Group Conference Calls, 1st and 3rd Thursday of each Month
 - Task Teams Collaborate and Share with Group



Objective/Goal

- Develop collaborative industry positions, systems and solutions in response to emerging chemical issues throughout the aerospace supply chain, with particular focus on REACH.

Scope/ Expected Result

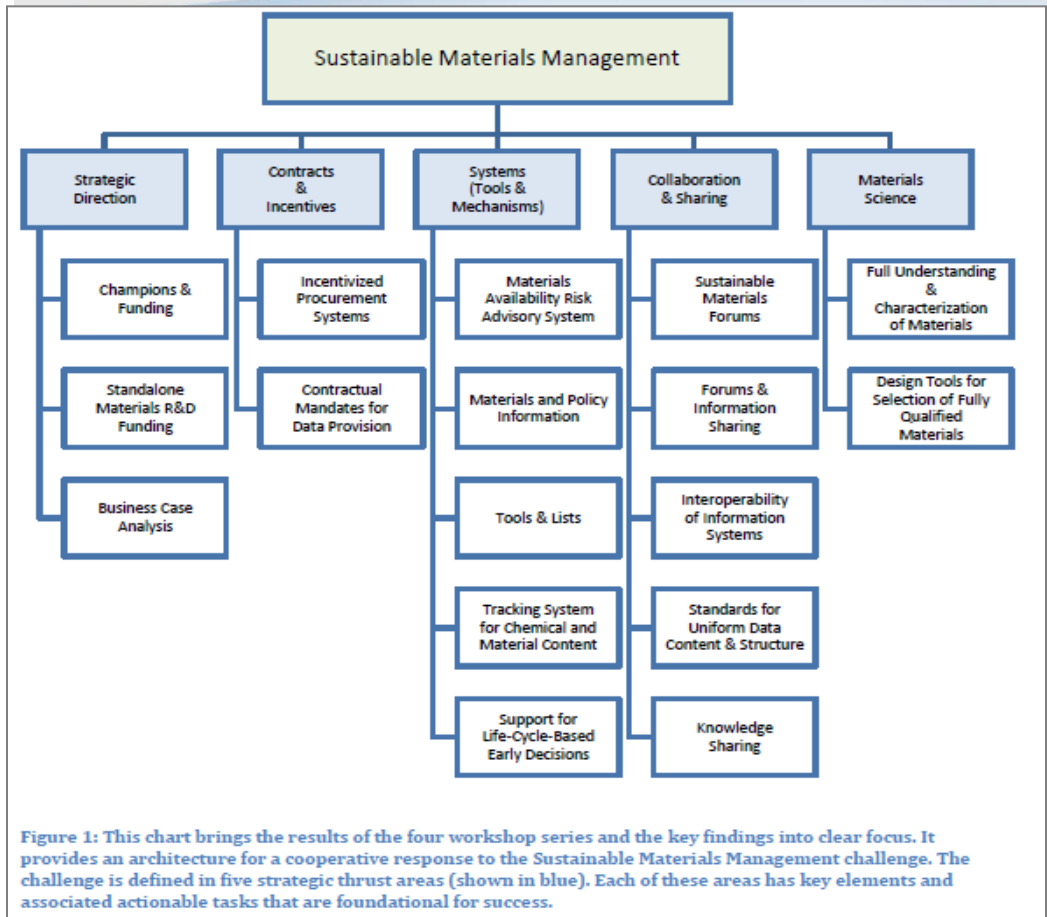
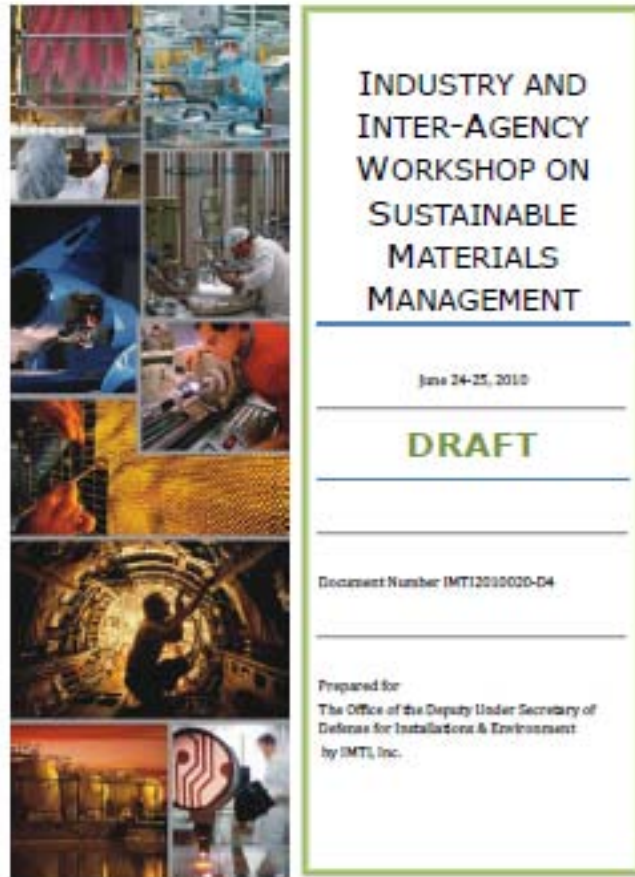
- Continue to assess the current state and readiness to comply with EU REACH legislation. This effort includes working with ASD (Aerospace & Defense Industries Association of Europe) and EU Aerospace Industries

Track, Collaborate, Communicate

- **G1: Registration, SVHC and Authorization Collaboration**
 - Assist industry in ensuring that uses of aerospace chemicals are registered
 - Identify industry-wide authorizations for commonly used SVHCs
 - Support required information exchange (Declarable Substances)
 - Standards Support
 - Review Dossiers for Substances of Concern to Aerospace and Submit Comments to ECHA
- **G2: Business Impact of REACH**
 - Identify products that may be withdrawn from the market, identify obsolescence concerns
 - Relate other business concerns for REACH impacts to appropriate AIA committees
 - Create Business Case and Supporting Documentation
- **G3: Legal Interpretations**
 - Defense Exemption Activities in the EU
 - Munitions Guidance Document
 - Articles Guidance Documents
 - Regulatory Definitions (e.g., Endocrine Disruptors, Nanomaterials)

- **G4: Development of Technical Alternatives (EMC)**
 - Increase participation on REACH-Eng team
 - Support advocacy for reducing the potential engineering impact of eliminated critical substances
- **G5: Information Technology Solutions (EEIC)**
 - Define industry attributes that can be used by member companies to select or develop IT tools for data management.
- **G6: Communication**
 - Collaborate with European Aerospace Industry Associations on REACH activities
 - Improve internal AIA Communication methods regarding REACH
 - Improve external Communication methods with key stakeholders regarding REACH
 - Improve Industry Collaboration Tools
 - Collaborate with AIA Committees and Councils
 - Present on activities at select conferences and symposiums

Customer Collaboration



- **Joint Workshop:** AIA/DoD/NASA : 6/2010
- **Separate Workshops:** DoD - 6/2009; AIA -8/2009; NASA – 2/2010
- **Partners in Environmental Technology Symposium:** Nov 29 – Dec 1, 2011



AIA Rapid Response Network

- Reviewed Aerospace Usage of Substances for:
 - TSCA Significant New Use Rule (SNUR) Proposal to Restrict deca-BDE Usage within US
 - AIA Comments Filed July 27
 - ASD Partnership
 - Developing Protocol for Working with EU Companies to Assess Potential Industry Impacts without Compromising ITAR, Proprietary, and other AIA Member Requirements
 - ECHA Proposals
 - March 2012 – 13 new Proposed SVHCs
 - *Input collected to determine potential aerospace impacts*
 - June 2012 – Currently Reviewing Substances Proposed in June for Authorization List
 - *Input will be used to file comments by September*
 - August 2012 – Notice of Substances proposed for ECHA Registry of Intentions for SVHC List
 - *Proactive review prior to formal ECHA proposal to SVHC list*

Joint AIA/ASD REACH Workshop

- February 28 – March 2, 2012
- Lockheed Martin's Global Training and Logistics Facility, Orlando, Florida
- Approx 60 Industry Attendees from 28 Companies/Agencies
- US, Europe (UK, France), Canada, Brazil



<i>3M</i>	<i>Airbus</i>	<i>Boeing</i>
<i>Bombardier</i>	<i>EADS</i>	<i>Embraer</i>
<i>GE</i>	<i>GD</i>	<i>GIFAS</i>
<i>Goodrich</i>	<i>Harris</i>	<i>Honeywell</i>
<i>Lockheed</i>	<i>Materion</i>	<i>Meggitt</i>
<i>NGC</i>	<i>Pratt-Whitney</i>	<i>Raytheon</i>
<i>Rockwell</i>	<i>Rolls-Royce</i>	<i>SAAB</i>
<i>SAFRAN</i>	<i>Sikorsky</i>	<i>Spirit</i>
<i>Textron</i>	<i>Timco</i>	<i>Triumph</i>
<i>NASA</i>		

Workshop Key Take Aways

- Chemical legislation change continues globally
 - Increasing global impact from region-specific regulations
 - Impact increasing on supply chains & existing products/chemicals
- Management focus has moved from EH&S to cross-functional teams
- AIA/ASD work rate and cooperation has increased
- We need better coordination of communications with key stakeholders
- We can cooperate in common approaches, collaborative developments and understanding why we are doing what we are doing
- Registration has impacted (global) supply chains
 - Reformulations have taken place, expected to continue
 - Classification and Labeling Provisions (CLP) is a route for introducing new SVHCs
 - Globally Harmonized System Implementation in the EU
- Authorisation
 - Time is short to find a way forward, and there are many uncertainties
 - Users downstream of the applicant are covered if use is covered

- Tracking chemical management regulations/programs outside REACH/EU:
 - USA
 - TSCA
 - States
 - CA Green Chemistry
 - Global
 - China
 - Korea
 - Brazil
 - Others
 - Increasing partnerships w/ customers and suppliers to
 - Develop/Qualify/Implement alternatives
 - Recognize aerospace industry product needs



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