AIA REACH Working Group Update

ASETS Defense Sustainable Surface Engineering
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**AIA REACH Working Group Update**

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Approved for public release; distribution unlimited

About

- **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, 1\textsuperscript{st} and 3\textsuperscript{rd} 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
Plan Elements

• **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  - Identify products that may be withdrawn from the market, identify obsolescence concerns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)
Plan Elements

• **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

- Partners in Environmental Technology Symposium: Nov 29 – Dec 1, 2011

Figure 1: This chart brings the results of the four workshop series and the key findings into clear focus. It provides an architecture for a cooperative response to the Sustainable Materials Management challenge. The challenge is defined in five strategic thrust areas (shown in blue). Each of these areas has key elements and associated actionable tasks that are foundational for success.
Networked Activities

■ AIA REACH-IT
  – REACH IT Scenarios and Guideline Document Completed
  – Setting up Wiki environment

■ AIA Rapid Response Network
  – Excellent work in establishing and piloting a consistent public consultation response system
  – Looking into teaming with ASD on this activity

■ National Aerospace Standards Committee
  – Created a REACH Standards Group to review existing NAS specifications that call out REACH impacted chemicals
  – Prioritizing standards for revision
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

![Image of attendees](image)

- 3M
- Bombardier
- GE
- Goodrich
- Lockheed
- NGC
- Rockwell
- SAFRAN
- Textron
- NASA
- Airbus
- EADS
- Boeing
- Embraer
- GIFAS
- Honeywell
- Meggitt
- Raytheon
- SAAB
- Spirit
- Triumph

- GD
- Materion
- Pratt-Whitney
- Rolls-Royce
- Sikorsky
- Timco
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
What’s Next?

• 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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