AIA REACH Working Group Update

ASETS Defense Sustainable Surface Engineering
August 27-30, 2012

Scott Fetter
Member, AIA REACH Working Group
Lockheed Martin
# AIA REACH Working Group Update

**Authors:**
Lockheed Martin Aeronautics, F-35 Materials and Processes, Pinellas Park, FL, 33782

**Meeting:** ASETSDefense 2012: Sustainable Surface Engineering for Aerospace and Defense Workshop, August 27-30, 2012, San Diego, CA. Sponsored by SERDP/ESTCP.

**Abstract:**
• **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
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  • Identify products that may be withdrawn from the market, identify obsolescence concerns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

- **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
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

3M  Boeing
Bombardier  Embraer
GE  GIFAS
Goodrich  Honeywell
Lockheed  Meggitt
NGC  Pratt-Whitney
Rockwell  Raytheon
SAFRAN  SAAB
Textron  Spirit
NASA  Triumph
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
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
For More Information, Contact AIA:
Lisa Goldberg
lisa.goldberg@aia-aerospace.org
703-358-1050