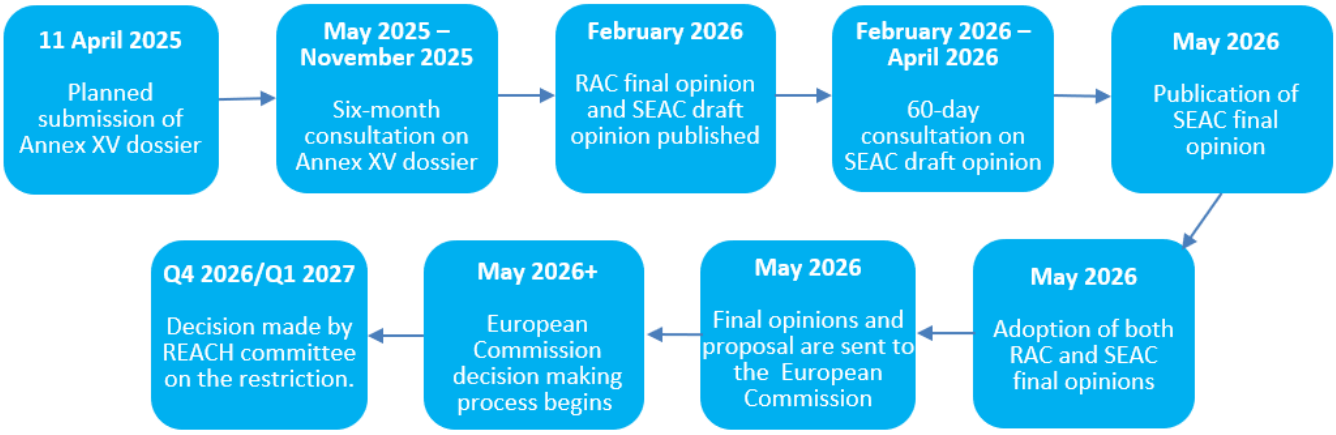
EU REACH Chromates Restriction Factsheet

Background

Chromium VI substances have faced increasing regulatory scrutiny over the past decade. Under the EU REACH regulation (EC) 1907/2006, multiple chromates were added to REACH Annex XIV (Authorisation list) in 2015, 2017, and 2019. Due to a higher-than-expected number of REACH Authorisation applications for Cr(VI) substances, ECHA's capacity has been exceeded. To address this, the European Commission asked ECHA to submit an Annex XV REACH Restriction dossier for chromic acid and chromium trioxide, later updating the mandate to include all eleven Chromium VI substances on the Annex XIV list. This expansion aims to avoid regrettable substitution. If enforced, it would be the first-time substances are moved from the Authorisation list to the Restriction list.

Estimated Restriction timeline



Chromates listed within the mandate

The chromium VI compounds that are included in the EU REACH Restriction proposal, along with their Authorisation list (i.e. REACH Annex XIV) entry number are as follows:

- Chromium trioxide (16)
- Dichromic acid (17)
- Chromic Acid
- Sodium dichromate (18)
- Potassium dichromate (19)
- Ammonium dichromate (20)
- Potassium chromate (21)
- Sodium chromate (22)
- Dichromium tris(chromate) (28)
- Strontium chromate (29)
- Potassium hydroxyoctaoxodizincatedichromate (30)
- Pentazinc chromate octahydroxide (31)
- Barium chromate
- Acids generated from chromium trioxide and their oligomers
- Oligomers of chromic acid and dichromic acid

Substances not currently listed in the Authorisation List under EU REACH, such as barium chromate, could also be incorporated into the restriction proposal. The European Commission's extended mandate calls for the inclusion of substances not presently listed in the Authorisation List but considered susceptible to fostering regrettable substitution.

Of further note, the extended mandate currently excludes the three lead chromate entries, which are commonly used as pigments in paints.

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Advice for industry stakeholders

Given the uncertainties and potential impacts of the Chromium VI compounds Restriction, RPA recommend industry stakeholders consider the following actions:

- Contributing to the public consultation on the Annex XV report. This is expected to open in May 2025 and run until November 2025.
- Continue to monitor developments on the Restriction and provide detailed and substantiated information to additional forthcoming consultations (SEAC opinion consultation expected between February and April 2026).
- Continue to assess whether substitution to safer alternatives can be made across your product ranges.
- Ensure that you have risk management measures in place when using Chromium VI compounds and ensuring the measures are effective in limiting exposure and emissions (engineering improvements).
- Define your ongoing business strategy surrounding Chromium VI compounds.

RPA's experience with REACH

RPA have been involved in REACH Applications for Authorisation covering more than 75 uses of chromate substances across the EU and UK, these cover uses product formulations, uses in the steel making sector for food and construction sectors, aerospace & defence uses, uses in industrial gas turbines used to produce energy, uses as part of electrolytic manufacture of sodium chlorite and potassium chlorate and functional chrome plating with decorative character. We are the consortium lead for the ADCR Consortium for their applications for authorisation.

On the Restriction, front RPA have also been involved in multiple projects relating to Restriction profiles. Examples include working on the universal PFAS Restriction. The team have worked with governments helping them to analyse consultation data whilst also helping industry clients to submit reliable information as a part of the ECHA public consultations.

The study team have a high degree of understanding of the challenges that have been faced and the regulatory context of Restrictions, including knowledge of proposed derogations, data gaps and basis of the regulatory action. This knowledge gives the team a strong basis for assessment of data and an ability to identify gaps where stages of the lifecycle of products may have been missed from submitted comments.

If you need further help

RPA can help stakeholders navigate the chromates restriction process, drawing on our extensive experience. We can help with:

- Preparing responses to call for evidence
- Helping prepare contributions to public consultations
- Stakeholder mapping of supply chains
- Helping to apply for and obtain specific derogations to allow sectoral uses to continue
- We can also prepare talks and webinars for companies to help them better understand the restrictions process

If you have any questions, please don't hesitate to email us at chemicals@rpaltd.co.uk.

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