AeroSpace and Defence
Industries Association of Europe

Answer to Consultation

ASD's ANSWER TO ECHA CONSULTATION

-

GENERAL CONCLUSIONS FOR ALL BORON AND LEAD COMPOUNDS

About ASD

ASD represents the Aeronautics, Space, Security and Defence industries in Europe. Based in Brussels, the organisation's membership today comprises 16 major European aerospace and defence companies and 27 member associations in 20 countries (Austria, Belgium, Bulgaria, the Czech Republic, Denmark, Finland, France, Germany, Greece, Ireland, Italy, the Netherlands, Norway, Poland, Portugal, Spain, Sweden, Switzerland, Turkey and the UK). These industries reach a turnover of 186.8 billion euros, invest 17.6 billion euros in R&D, employ more than 750.000 people and counts over 3000 companies, 80 000 suppliers, many of which are SMEs.

Rue Montoyer, 10 , B-1000 Brussels, Belgium
Telephone: +32 2 775 81-10. Fax: +32 2 775 81-12
E-mail: info@asd-europe.org – www.asd-europe.org

GENERAL CONCLUSIONS FOR ALL BORON AND LEAD COMPOUNDS

In conclusion should the boron chemicals or lead oxide be placed into Annex XIV we request that a significantly longer sunset date (and LAD) be applied to allow aerospace to find, qualify and deploy replacements. Our view is that the extension should be seven years minimum compared to what is proposed today.

The fact that the aerospace industry is already (and will still be in the coming years) putting a huge amount of effort into the substitution of chromates will make it more vastly more difficult for the substitution of other substances also involved in the same corrosion protection systems at the same time. The potential for conflicting timescales is of serious concern to all our members.

****

Jan Pie
Secretary General
28 November 2014

Rue Montoyer, 10 , B-1000 Brussels, Belgium
Telephone: +32 2 775 81-10, Fax: +32 2 775 81-12
E-mail: info@asd-europe.org – www.asd-europe.org