

Comments for Annex XV restriction report

Substance name

Certain chromium(VI) oxides, oxyacids and salts

EC Number

-

CAS Number

-

Scope

Restricting the use of certain chromium(VI) oxides, oxyacids and salts.

Before you fill in the form, read the **Consultation Guidance** and the specific **Information Note** as they explain both the process and the proposal itself.

[Link to the Consultation Guidance](#)

[Link to the Information Note](#)

Compulsory fields/tick boxes are marked with an asterisk (*)

* ☒ I have read the Consultation Guidance and Information Note

All non-confidential comments will be made publicly available once a month during the duration of the consultation.

The Consultation is intended to provide ECHA's Committees with scientific and technical information to assist them in the development of their opinions. Although other information can be submitted, any abusive comments will not be published monthly and only published at the end of the process without any response from the Dossier Submitter or the Rapporteurs.

Where did you learn about this consultation? (please select all that apply):*

ECHA

European Commission

National Authorities

Social media

Industry organisation ☒

NGOs and trade unions

Press

Other (please specify)

SECTION I. Personal information

We may contact you about your comment and to request additional information.

* First Name : **Gernot**

* Family Name : **Dr. Strehl**

Email: ***g.strehl@zwilling.com**

* Country : Please select country. **France**

Phone : **+49-151-2031-6055**

Any personal data submitted is subject to [ECHA's data privacy rules](#)

SECTION II. Organisation

I am submitting information: *

On behalf of a Member State Competent Authority

As an Individual

X On behalf of an organisation or institution

Type of organisation/institution:*

Please select organisation type.. Company National Authority Regional or local authority Academic institution National NGO International NGO **Industry or trade association** European institution International organisation Trade union Other contributor

Country where the organisation or institution is legally established: *

Please select country. **France**

Name of organisation / institution: **Federation of the European Cookware, Cutlery and Houseware Industries (FEC)***

Select one of the following options : *

X I agree to the disclosure of the name of my organisation/institution to the public

I want to keep the name of my organisation/institution confidential. (I also understand that it is my responsibility to ensure that I do not include the name of the organisation/institution in responses to general comments and in any responses to requests for specific information)

Note: the type and country of your organisation/institution will always be disclosed.

SECTION III. Non-confidential comments

It is possible to provide both general comments on the Annex XV restriction report subject to this Consultation and answers to the specific questions posed. In both cases, it is necessary to provide supporting evidence to allow ECHA's Committees to take your comments into account. It is important not to leave the submission of any socio-economic information until the consultation on SEACs opinion but already submit relevant comments at this stage.

General Comments

*X I understand that it is my responsibility not to include confidential information in responses to general comments and in any responses to requests for specific information (e.g. company name, email addresses, phone numbers, signatures etc.). ECHA will not be held liable for any damages caused by making non confidential responses publicly available.

Please provide your general comments in the box below

FEC welcomes the restriction proposal for certain chromium(VI) oxides, oxyacids and salts, because it will create a reliable environment for manufacturers and avoid efforts for individual authorizations on a case-by-case basis.

Specific Information Requests

1:

Please indicate which Use Categories (UC) from the list your comments apply to:

- *UC1: Formulation of mixtures*
- *UC2: Electroplating on plastic substrate*
- *UC3: Electroplating on metal substrate*
- *UC4: Use of primers and other slurry coatings*
- *UC5: Other surface treatments (ETP and others)*
- *UC6: Uses as functional additive/process aid (closed list of uses)*

* Compulsory Fields

X I have information on this topic

I don't have information on this topic

Articles used in our business sector belong to UC3. Important examples are chromium plated sharpening steels for knives and coated carbon steel/ Electrolytic-Chromium-Coated-Steel (ECCS) for non-stick cookware and bakeware.

FEC supports Option A, because we fear, that Option B might lead to a relocation of coating processes out of Europe, which in consequence would weaken our supply chain and lead to additional costs from tariffs and fees (CBAM).

Emerging alternatives to ECCS do not yet offer the same properties and performance. The productivity and availability is far below the current production method.

2:

Have you already contributed to the previous call(s) for evidence during the preparation of this restriction dossier? If so, in which way is your current contribution different or complementary to the previous one? (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

3:

Have you submitted an Application for Authorisation which has been or will be evaluated by the Committees? If yes, in which way is your current contribution different or complementary to your Application for Authorisation? (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

4:

Are you a downstream user of Chromium (VI) substances covered under an upstream Application for Authorisation by your supplier(s) and having submitted an Article 66 notification on your authorised uses? If so, in which way is your current contribution different or complementary to your notification? (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

5:

Please provide comments on substance identity, physical and chemical properties. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

6:

Please provide comments on substance manufacturing and uses. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

7:

Please provide comments on the hazard assessment. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

8:

Please provide comments on the emissions and exposure assessment. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

9:

Please provide comments on the risk assessment. (maximum 5000 characters)

* Compulsory Fields

☐ I have information on this topic

☒ I don't have information on this topic

10:

Please provide comments on the expected effectiveness in risk reduction of the different restriction options. (maximum 5000 characters)

* Compulsory Fields

☐ I have information on this topic

☒ I don't have information on this topic

11:

Please provide comments on the impact assessment (human health impacts, economic impacts, other impacts). (maximum 5000 characters)

* Compulsory Fields

☐ I have information on this topic

☒ I don't have information on this topic

12:

Please provide comments on practicality, including enforceability. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

13:

Please provide comments on monitorability. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

14:

Please provide comments on the uncertainty analysis. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

15:

If you have sites, or even production lines or rooms, in which **more than one** of the six Use Categories (UC) described in the Annex XV dossier are performed, please specify which ones. Please describe how these uses are segregated in the workplace if applicable. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

16:

Decorative uses: The restriction dossier presents an assessment of the impact of banning “functional uses of Chromium (VI) substances with decorative character” (UC 2, UC 3) in Appendix E.1.4. Please indicate whether you agree or disagree with the assessment and back your arguments with factual (technical, economic) data/figures.

Additional questions for UC 2: Electroplating on plastic substrate is considered as a representative use of Chromium (VI) substances in which the Chromium (VI) is aiming to provide a ‘decorative character’ to articles among their technical functionalities. This decorative character could be e.g. achieving a specific colour or shine.

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- **If you are an EEA-producer:** Do you produce articles that have, among the technical functionalities of Chromium (VI), to provide decorative character to your article? **If yes:**

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- Please provide a list of articles where the use of Chromium (VI) provides a decorative character to the article among its technical functions.
 - What is the market share of those articles compared to your total Chromium (VI)-related revenues?
 - What is the total amount of Chromium (VI) used to produce those articles (in tonnes per year)?
 - If you could not produce those articles in the EEA with Chromium (VI) substances, what would currently be your likely reaction?

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- **If you are an EEA-importer:** Do you import articles that are, or could be, coated with Chromium (VI) substances that have to meet particular aesthetic requirements required by European or international standards or customer requirements? **If yes:**

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- Please provide an indicative description of those articles and the total amount of articles imported (in tonnes per year).
 - What are the sales’ trends of those articles?

(maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

17:

For any relevant use **not identified in the restriction dossier**, please specify the Chromium (VI) substance and tonnage used in 2023, a short use description (including functionalities and products manufactured), the economic sectors involved and any evidence to support that the use is currently taking place in the EEA. In addition, please provide information on the exposure levels of workers and the general population resulting from this use, as well as on possible measures to reduce exposure and the costs you expect from the implementation of these measures. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

18:

If you produce in the EEA coatings on articles with a residual Chromium (VI) content (e.g. for self-healing purposes), or import articles into the EEA with a residual Chromium (VI) content, what is the concentration of Chromium (VI) in the coating and what is the concentration of Chromium (VI) in the article? Please specify what kind of articles (e.g. provide a list) you produce/import with a residual Chromium (VI) content. What is the market share of those articles compared to your total Chromium (VI)-related revenues? What is the total amount of these articles produced or imported (in tonnes of articles per year, or, alternatively, in tonnes of Chromium (VI) content per year)? (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

19:

Please provide information on any additional instructions, procedures, guidelines, good practice examples, etc (not already mentioned in the dossier), that describe the conditions for using Chromium (VI) substances, such as risk reduction measures and operational conditions, and that enable you to meet the exposure and emissions limits. Please provide these as a link to the internet source. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

20:

Do you consider that the costs of **monitoring** for workers and releases to the environment provided in the restriction dossier are representative of the current costs for monitoring campaigns in the EEA? **If not**, please provide further details supporting your response (number of samples, testing methods and cost in euros for each monitoring campaign, specifying if it applies to workplace measurements and/or measurements of the emissions to the environment). (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

21:

What are the current limits of quantification (LOQs) of the methods you use to monitor workplace exposure and environmental emissions? If so required, and if measurements would have to be done with an LOQ that is < 10% of the exposure and emission limits proposed in the different options in the Annex XV dossier, would you be able to reduce the LOQs to match these values (possibly requiring to change the sampling and analytical methods)? (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

22:

Are you aware of any other chromium (VI) substances, not in the scope of the restriction, which could be used as alternatives for the uses described in the restriction dossier? If yes, please indicate which substances appear suitable and for which uses. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

23:

If you have already substituted Chromium (VI) substances in your processes and products, please provide details on the original use of the Chromium (VI) substances and the alternative you are using instead, on the investment required and actions undertaken to substitute Chromium (VI) substances in your operation, as well as on potential recurrent costs arising from the use of alternatives. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

24:

If you have (partly) relocated the activities that require use of Chromium (VI) substances out of the EEA, or if you are planning to do so, please explain your motivation (e.g. has this been motivated by the possibility to continue using Chromium (VI) substances, or have you chosen to invest in alternative substances/technologies to Chromium (VI) in these non-EEA sites?) (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

☒ I don't have information on this topic

25:

How do you expect that the restriction will affect the use of Chromium (VI) substances in your company (decrease, remain constant, increase)? Please justify your response. (maximum 5000 characters)

* Compulsory Fields

I have information on this topic

X I don't have information on this topic

SECTION IV. Confidential comments

Confidential information will only be used by ECHA, including its Committees, by the Member State competent authorities and by the European Commission.

When you insert a confidential comment, please justify the reasons for confidentiality of the information in the field below. This will facilitate ECHA's work if it receives requests for access to documents.

* I have the following reasons enumerated in Article 4(1) or 4(2) of [Regulation \(EC\) No 1049/2001](#) regarding public access to documents why the information submitted as confidential cannot be disclosed to persons requesting access to documents (please explain below in the commenting field those reasons; a reason could be that the protection of your commercial interests, including intellectual property, would be undermined).

Please provide your confidential comments in the box below: