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| SONACA 🡪 SUPPLIER | | | **X** | Application | **X** | **R**  **E**  **P**  **L**  **Y** | **REQUIRED** 🡪 | | | | | YES | x | NO |  |
| SUPPLIER 🡪 SONACA | | |  | Information |  | Application | | |  | REQUIRED BY | | | | |
| AUTHOR : | | **SONACA REACH TEAM** :  F. Desrumaux / L. Pereira / D. Ghysselinckx / E. Le Fort. | | | | Information | | | **X** | **30/08/2017** | | | | |
| APPROVAL : | | L. DEJAIE | | | | SUBJECT: | | | | | | | | | |
| ADRESSEE | Company : | | **Letter to : TIER 1 SUPLIERS of SONACA** | | | **REACh BAN DATE FOR USE OF CERTAIN CHromates**  **Obsolescence risk mitigation** | | | | | | | | | |
| Recipient : | | **Quality Manager** | | |
| Additional Distribution: | | SONACA \ Reach TEAM  SONACA \ L. Geerts  SONACA \ O. Delneufcourt  SONACA \ L. Philippe | | |
| Contract / Program / Affected material | | | All A/C programs, surface treatment processes. | | | | | | |
| 1. **REFERENCES**   [REF 1] : REACh regulation,  [REF 2] : SONACA Qualified Supplier List,  [REF 3] : The below list of 14 surface treatment processes submitted to compulsory qualification :   |  |  | | --- | --- | | **Specification** | **Process Designation** | | NE 40-030 | CP - Chromic Acid Anodizing | | ADET 0072 | CP - Chromic Acid Anodizing | | AIPS 02-01-001 | Chromic acid anodizing of aluminium alloys | | PS 6.5501 | CP - Chromic Acid Anodizing - Bengough Process | | PS 6.5502 | CP - Chromic Acid Anodizing - BF4 Process | | PS 6.5541 | CP - Chemical Conversion | | NE 40-006 | CP - Chemical Conversion | | ADET 0079 | CP - Chemical Conversion | | ADET 0175 | CP - Chemical Conversion - Touch-up | | AIPS 02-05-001 | Chemical Conversion Coating | | PS 6.5561 | CP – Passivation | | NE 40-081 | CP – Passivation | | PS 6.5601 | CP - Electrolytic Cadmium Plating | | NE 40-010 | CP - Electrolytic Cadmium Plating | | PS 6.5605 | CP - Vacuum Cadmium Plating |   [REF 4] : Sonaca General Quality Requirement for Suppliers (QRS 00.00) requiring those processes to be exclusively carried out by Qualified Suppliers dully registered in [REF 2].   1. **DISCUSSION**   The purpose of this letter is to identify any possible supply chain perturbation caused by the ban date of certain chemical substances in name of REACh regulation.  As tier-1 supplier of SONACA, your company could produce parts that include one or several surface treatment processes referenced in [REF 3]. The application of these processes induces the usage of chemical products containing **Chromium Trioxide,**  S**odium Dichromate** , **Potassium Dichromate**, **strontium chromate** or **Dichromium tris(chromate)** substances. In application of REACh regulation [ref 1], these 2 substances are known as being subjected to a risk of programmed obsolescence.  To mitigate this risk and its consequences (i.e. supply chain disruption), SONACA S.A. has worked on identifying alternatives or substitutive processes, and short and medium terms solution to secure industrial operations. In that framework, all the qualified suppliers from [REF2] have been asked to share their mitigation strategy for each one of these 3 processes. Mitigation strategy could be, either :   * Usage of identified alternative or substitutive process, where existing, or * Rely on the authorization demand introduced by CTAC (solution requiring prerequisite and conditions), or * Cessation of activity related to this process.   As a 2ndstep **we would like to know the scope and way for mitigation selected or preferred by your company for the surface treatments in [REF 3], carried out by your company or ordered qualified supplier in [REF 2]**.  Purpose is to anticipate the risk of obsolescence by an agreed action plan and, to avoid disconnect, to cross check Tier-1 strategy VS Surface treatement supplier strategy.   1. **ACTIONS**   Please would you complete the attachments #1. Then, where relevant, complete attachments #2, #3 and #4 and return them to SONACA (mail reply) before the required date specified in letter header.   1. **ATTACHMENT #1/4 SCOPE**  |  |  |  |  |  | | --- | --- | --- | --- | --- | | **Your company name :** | |  | **Questions :** | | | **Specification** | **Process Designation** | | Is this process used in production for SONACA parts ? | Surface Treatment *company name* or “*internally performed*” | | NE 40-030 | CP - Chromic Acid Anodizing | | ***Yes / No*** |  | | ADET 0072 | CP - Chromic Acid Anodizing | | ***Yes / No*** |  | | AIPS 02-01-001 | Chromic acid anodizing of aluminium alloys | | ***Yes / No*** |  | | PS 6.5501 | CP - Chromic Acid Anodizing - Bengough Process | | ***Yes / No*** |  | | PS 6.5502 | CP - Chromic Acid Anodizing - BF4 Process | | ***Yes / No*** |  | | PS 6.5541 | CP - Chemical Conversion | | ***Yes / No*** |  | | NE 40-006 | CP - Chemical Conversion | | ***Yes / No*** |  | | ADET 0079 | CP - Chemical Conversion | | ***Yes / No*** |  | | ADET 0175 | CP - Chemical Conversion - Touch-up | | ***Yes / No*** |  | | AIPS 02-05-001 | Chemical Conversion Coating | | ***Yes / No*** |  | | PS 6.5561 | CP – Passivation | | ***Yes / No*** |  | | NE 40-081 | CP – Passivation | | ***Yes / No*** |  | | PS 6.5601 | CP - Electrolytic Cadmium Plating | | ***Yes / No*** |  | | NE 40-010 | CP - Electrolytic Cadmium Plating | | ***Yes / No*** |  | | PS 6.5605 | CP - Vacuum Cadmium Plating | | ***Yes / No*** |  |   YES reported in front of Chromic Acid Anodizing process => Please complete Attachement 2/4.  YES reported in front of Chemical Conversion process => Please complete Attachement 3/4.  YES reported in front of Passivation / Cd plating processes => Please complete Attachement 4/4.   1. **ATTACHMENT #2/4 For chromic anodizing**  |  |  | | --- | --- | | For chromic anodizing | | | 1. Use of a chromium trioxide free alternative   *If YES, precise the selected alternative (TSA, other ….)* | YES - NO  ……………………………………………………….  ………………………………………………………. | | 1. Rely on the authorization demand introduced by CTAC   *If YES, confirm that you fulfill the 2 following points\*:*   * *You are supplied by a chemical supplier covered by the Authorization*   *(http://asd-europe.org/sites/default/files/atoms/files/ASD%20Supply-Chain%20Communication%20on%20Authorisation\_160215.pdf)*   * *You comply with the workplace safety and environmental requirements described in the Chemical Safety Report (Use 4/5)*   *(*[*https://echa.europa.eu/documents/10162/d0faca3c-50cf-4bdc-96be-e39b5114c54b*](https://echa.europa.eu/documents/10162/d0faca3c-50cf-4bdc-96be-e39b5114c54b)*)* | YES - NO  YES - NO  YES - NO | | 1. Cessation of the activity   *If YES, list the impacted parts* | YES - NO  ……………………………………………………….  ……………………………………………………….  ……………………………………………………….  ………………………………………………………. |   \* Evidence will be kept and will be auditable at any time by Sonaca   1. **ATTACHMENT #3/4 For chemical conversion**  |  |  | | --- | --- | | For chemical conversion | | | 1. Rely on the authorization demand introduced by CTAC   *If YES, confirm that you fulfill the 2 following points\*:*   * *You are supplied by a chemical supplier covered by the Authorisation*   *(http://asd-europe.org/sites/default/files/atoms/files/ASD%20Supply-Chain%20Communication%20on%20Authorisation\_160215.pdf)*   * *You comply with the workplace safety and environmental requirements described in the Chemical Safety Report (Use 4/5)* * *(*[*https://echa.europa.eu/documents/10162/d0faca3c-50cf-4bdc-96be-e39b5114c54b*](https://echa.europa.eu/documents/10162/d0faca3c-50cf-4bdc-96be-e39b5114c54b)*)* | YES - NO  YES - NO  YES - NO | | 1. Cessation of the activity   *If YES, list the impacted parts* | YES - NO  ……………………………………………………….  ……………………………………………………….  ……………………………………………………….  ………………………………………………………. |  1. **ATTACHMENT #4/4 For type II passivation after cadmium plating**  |  |  | | --- | --- | | For Type II passivation after cadmium plating | | | 1. Rely on the authorization demand introduced by CTAC   *If YES, confirm that you fulfill the 2 following points\*:*   * *You are supplied by a chemical supplier covered by the Authorisation*   *(http://asd-europe.org/sites/default/files/atoms/files/ASD%20Supply-Chain%20Communication%20on%20Authorisation\_160215.pdf)*   * *You comply with the workplace safety and environmental requirements described in the Chemical Safety Report (Use 4/5)* * *(*[*https://echa.europa.eu/documents/10162/d0faca3c-50cf-4bdc-96be-e39b5114c54b*](https://echa.europa.eu/documents/10162/d0faca3c-50cf-4bdc-96be-e39b5114c54b)*)* | YES - NO  YES - NO  YES - NO | | 1. Cessation of the activity   *If YES, list the impacted parts* | YES - NO  ……………………………………………………….  ……………………………………………………….  ……………………………………………………….  ……………………………………………………….. |   ------------- END OF MEMO ------------------ | | | | | | | | | | | | | | | |
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