R. SPITZKE · HARTCHROMTECHNIK GALVANISCHE OBERFLÄCHENVERFAHREN



R. Spitzke Oberflächen-und Galvanotechnik GmbH & Co KG

To all Customers

Barsbüttel, den 05.05.2025

News on the restriction of Cr(VI) (chromium trioxide)

Dear Customers.

After the EU Commission decided to transfer Cr(VI) substances from Annex XIV (authorization requirement) to Annex XVII (restriction) (see also customer information dated September 28, 2023), ECHA published a proposal on April 29 for a Europe-wide restriction of various Cr(VI) substances. The European Commission must now make a decision on this matter.

ECHA proposes to introduce a horizontal ban on Cr(VI) substances, with exceptions for six defined use categories, provided that companies comply with established limits for worker exposure and environmental emissions.

The six defined categories cover all applications we perform for our customers, ranging from formulation to electroplating of plastics and metal substrates.

For the restriction, ECHA has developed three alternatives (R01–R03), outlining the potential impacts on human health, the environment, the economy, and the EU internal market. Following a six-month public consultation, the EU Commission will make a decision based on the opinions of the RAC and SEAC committees.

We assume that Spitzke will comply with the expected exposure limits and will therefore be able to continue offering all current Cr(VI) coatings to its customers in the future.

Once the EU Commission has made its decision, the restriction is expected to take effect in 2028. Additionally, an 18-month transition period has been proposed, meaning that the restriction would not become legally binding for all companies until mid-2029 at the earliest.

Until then, only companies that have previously submitted an authorization application to ECHA on time will be permitted to continue operations. For Spitzke, this is the Hapoc application.

If you have any further questions, we are always happy to assist you.

Thomas Schüler

Geschäftsführund