

**From:** [REDACTED] (GROW)  
**Sent:** mardi 15 novembre 2022 10:19  
**To:** [REDACTED] (GROW)  
**Subject:** Minutes meeting with ACEA and CLEPA on chromium trioxide for automotive sector (CTAC use 3)  
**Attachments:** CTAC Sub UC3 - Questionnaire Results.pdf

**Meeting with ACEA and CLEPA on chromium trioxide for automotive sector (CTAC use 3)**  
**Thursday 10 November 2022, 10:00, TEAMS**

**Participants:**

ACEA and CLEPA: [REDACTED]  
[REDACTED]  
GROW: [REDACTED]  
ENV: [REDACTED]

**Presentation:** see attachment

**Positive message:** by 2025, half of the respondents to the survey indicated they will be able to transition to alternatives (mainly Cr(III)). Those who need more time, could apply for an authorisation on their own.

**Timing of refusal CTAC use 3:** GROW gave a general overview of the current status of authorisations, and referred to the opinions of RAC and SEAC and that a decision on CTAC\_use\_3 will soon be referred to the Member States in the REACH Committee as the margins for manoeuvre for the Commissions are currently very limited in view of the opinions of ECHA's scientific committees.

**Authorisation system/downstream applications:** Influx of authorisations from downstream users will be challenging in the future. In addition, even narrow downstream applications are difficult to get approved, i.e. broad uses even more difficult. GROW highlighted that in DU applications, it is important to calculate the risk realistically.

**Business case for plating in the EU:** If the downstream applications are not approved before the refusal is in force it is unlikely that businesses would restart production at the same sites. The interruption will prompt relocation to other areas.

**Decorative uses:** socio-economic aspects (employment in the EU), companies are already importing articles plated using Cr(VI) substances from third countries (China) because of the regulatory uncertainty in the EU.

**Court case:** GROW briefly mentioned that the advocate general issued its opinion on EP vs COM on CTAC use 1,2,4,5. The AG suggested that the decision should be annulled (following the line of the EP).  
**Follow up:** possible meeting beginning of 2023.

**Transparency registry:**

ACEA: 0649790813-47

CLEPA: 91408765797-03