



European Association of Automotive Suppliers

# **CTACSub AfA Use 3 decorative plating on metal and plastic**

*ACEA/CLEPA Questionnaire - Results*

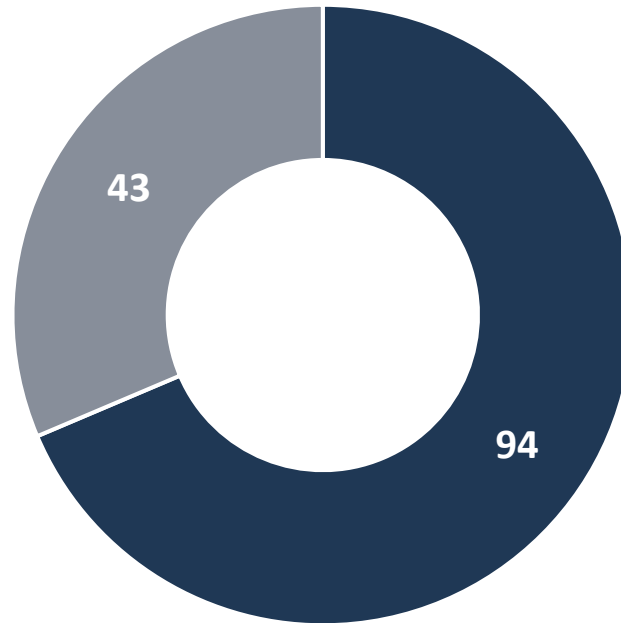
22/09/2022



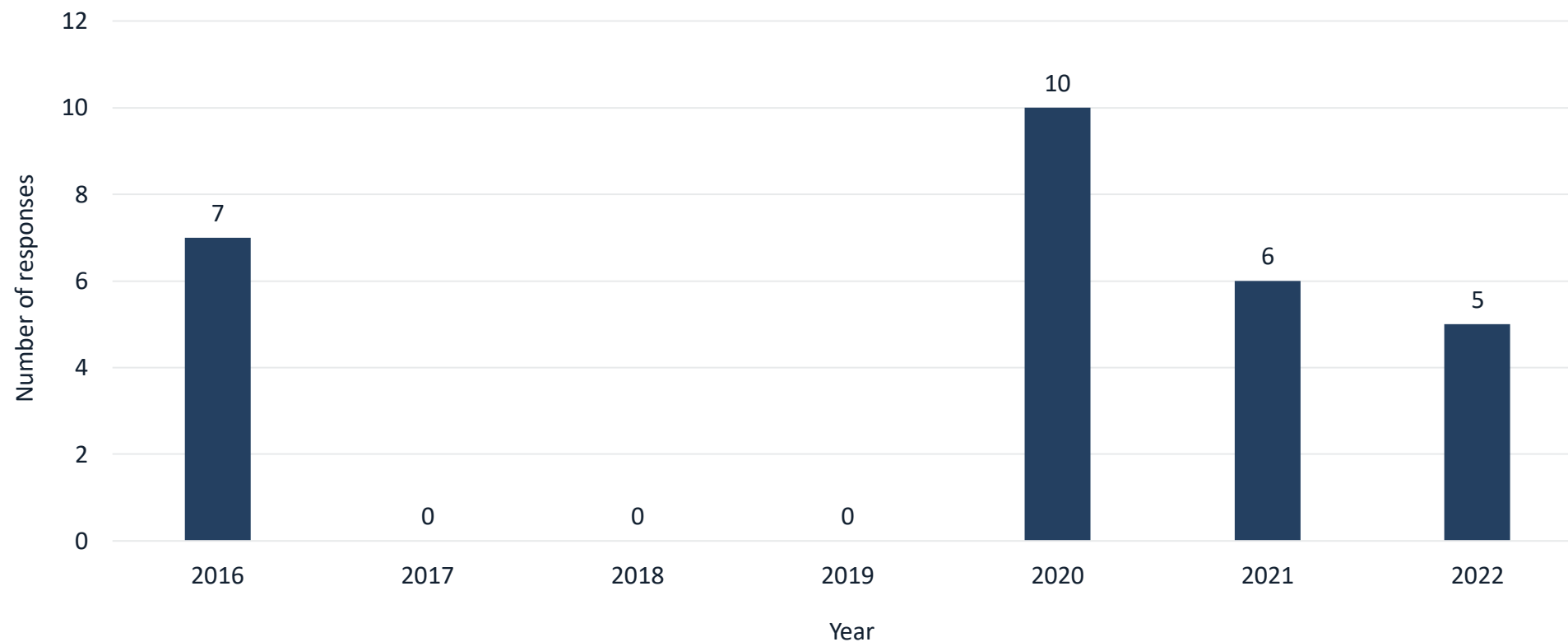
# Did you already file an individual application on your use beside CTACSub?



■ No  
■ Yes

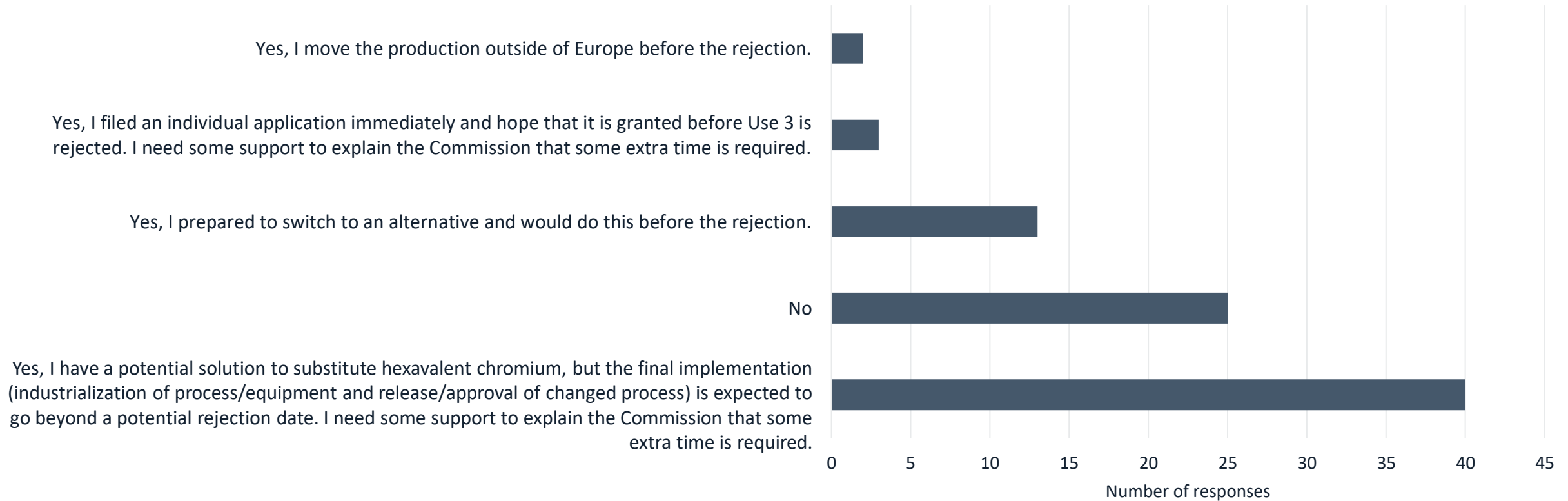


## (If you answered Yes) When did you file your application?

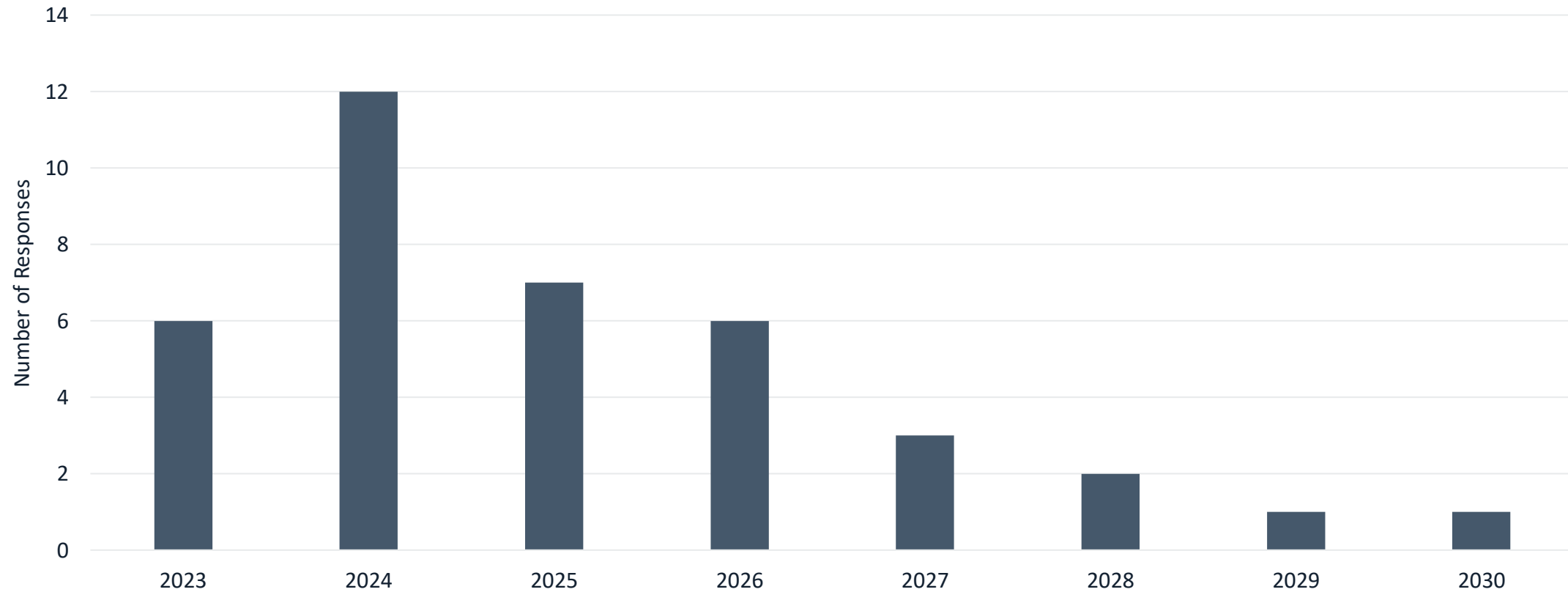


*\* Based on 28 written replies*

# (If you answered No) Do you have any solution to continue the production of automotive parts?



# If you need extra time to switch, until when:



*\* Based on 38 written replies*

# Additional comments provided (1/2)



*“We believe that the performance of chromium 6-based galvanising treatment is not replaceable for both the automotive and hospital sectors, the main sectors in which we are involved. The excellent containment and control of risks of use in production sites achieved over the last decade should really be compared with all the uncertain and insufficiently tested variables we face by forcing a switch to chromium3.*

*This goes against the three cornerstones of the circular economy: reducing raw material consumption, designing products with longer life cycles and recycling. This leads all producers of goods to also be responsible for the end of the product, I believe we are in the crucial stages of our future.*

*It will be a good test of wills at all levels that we can consciously break down the limit of simply continuing to talk about the circular economy in favour of doing something to achieve concrete goals for the global community.” (provided by email)*

# Additional comments provided (2/2)



*“We’ve just filled in survey but I would like to add some comments because this situation (refusal of mentioned application for authorization) could have serious consequences for our business. In survey we marked that we are preparing to implement chrome III but we need more time to industrialize our nickel-chrome line.*

*First of all chrome III is not good alternative for us because our company is a platter of mufflers and exhaust systems (blends) and the layer of Chrome based on Cr+3 technology doesn’t fulfil all requirements eg. Temperature resistance (discoloration in high temperature).*

*Secondly we are medium sized, family company hiring 60 employees with yearly turnover 2 500 000 EUR and we can’t afford for own authorisation and authorisation via CTACSub for Use 3 was the best solution for our company and many others small and medium companies.*

*The risk for us is that even if we invest in Chrome III technology market will not accept worse quality of products and in consequences we will lost this business (the risk to produce outside EU).” (provided by email)*