

EU REACH Management System: Procedure

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1.0 **PURPOSE/SCOPE**

This procedure outlines how Collins Aerospace will ensure Articles shipped within European Economic Area (EEA), into the EEA, and to contract customers will meet the provisions of Registration, Evaluation, Authorization and restriction of Chemicals (**REACH**) Regulation European Commission (EC) No 1907/2006 and UTC requirements.

2.0 **RESPONSIBILITY**

It is the responsibility of Strategic Business Unit (SBU) leadership to ensure compliance to this procedure. Each SBU and their associated functional groups (e.g. engineering, supply chain, EH&S, contracts etc.) are responsible to implement this procedure and the controls necessary to show compliance. In cases where program magnitude, scope or type warrant an alternate approach, tailoring or exemption from this procedure's requirements shall be reviewed and approved by SBU leadership, with concurrence from Green Products Office. Tailoring or exception decisions shall be documented per SBU policies and meet all contractual and regulatory requirements.

Responsibilities for the requirements of this procedure shall be defined and documented by SBU/site and approved by SBU/site leadership.

3.0 **REFERENCES**

None

4.0 **DEFINITIONS/ABBREVIATIONS**

4.1 Definitions

- Article: An object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition.
- Article 33: EEA regulation that requires all EEA producers, importers and other suppliers of Articles to communicate sufficient information to allow safe use.
- Article 66: EEA regulation that requires a downstream user of a substance of very high concern on the Authorization List (REACH Annex XIV) under an authorization held by an actor up its supply chain to notify its use to ECHA.

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- Authorization List: Candidate list substances which are included in Annex XIV of REACH and receive a sunset date after which the substance cannot be used or imported into the EU without authorization from ECHA.
- Candidate List: The European Chemicals Agency (ECHA) has identified the list of substances that may have serious effects on human health and the environment. These are primarily substances which are carcinogenic, mutagenic or toxic to reproduction as well as substances with persistent and bio-accumulative characteristics. Other substances of equivalent concern include, for example, endocrine disrupting chemicals. The Candidate List is issued and normally updated twice per year.
- European Commission (EC): The executive branch of the European Union who is responsible for proposing legislation and implementing decisions for the European Union.
- European Chemical Agency (ECHA): A regulatory agency of the European Union who manages the technical and administrative aspects of European Union environmental regulations including REACH.
- European Economic Area: (EEA) a free-trade zone created in 1994, composed of the states of the European Union together with Iceland, Norway, and Liechtenstein.
- EU: European Union
- REACH: REACH (Registration, Evaluation, Authorization and restriction of Chemicals) is the European Union regulation for chemical usage, which went into effect in June 2008. The European Chemicals Agency (ECHA), located in Helsinki, Finland was formed in 2006 to manage technical, scientific and administrative aspects of REACH including providing information on chemicals to ensure their safe use, competitiveness and consistency across the European Union and member states of the European Economic Area. The ECHA website is a source of information on REACH. This site provides the latest technical guidance, tools, data on chemicals and the Regulation. Reference link: <https://echa.europa.eu/web/guest/home>.
- Strategic Business Unit (SBU): This refers to the high-level internal divisions within Collins Aerospace.
- Site: Engineering Office responsible for interpretation and implementation of Product Environmental requirements throughout Collins Aerospace
- SVHC: Substance of Very High Concern
- Safe Use Instruction (SUI): A document which communicates safe use information to the recipient of a shipment meeting the criteria of the REACH. REACH Article 33 drives the use of SUI to communicate information on substances in articles.
- Tonne: Metric ton equal is equivalent to approximately 2,204.6 pounds, 1.10 tons (US) or 0.984 tons (old UK).
- w/w: weight/weight

5.0 **REQUIREMENTS**

5.1 Applicability of REACH Regulation

Compliance with REACH is required for all Collins Aerospace SBU sites located within the EEA which manufacture and/or import articles. Compliance with REACH is not required by law for SBU operations located outside the EEA, however as Collins Aerospace products are utilized worldwide and have the potential of being imported into the EEA, REACH reporting compliance

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may be necessary as a result of a contract requirement or mutual agreement. Collins Aerospace shall provide our customers with the REACH data required for compliance to ECHA REACH regulation.

5.2 Determination of Substances in Articles

Collins Aerospace is required by either regulations (EEA sites) or contracts (non-EEA sites) to report any Candidate List substances which exceeds 0.1% threshold w/w in a given Article.

The REACH regulation requires substance reporting information to be provided as a greater-than statement (for reporting purposes only).

In order to comply with regulations, SBUs must ensure the latest revision of the European Chemicals Agency (ECHA) Candidate List is used for all review activity. The latest Candidate List can be found at: <http://echa.europa.eu/web/guest/candidate-list-table>

Collins Aerospace Engineering has the authority and expertise to identify specific substances remaining in products/Articles using risk based processes or by direct calculation. Where engineering has determined through a risk-based review that certain product/Article has a very high likelihood of triggering the REACH reporting threshold, the Article can be reported as exceeding the weight threshold.

5.3 Notification of Substances in Articles (EEA Sites Only)

A submission to ECHA of specific information on Candidate List substance and its uses in Articles is required only if the following 3 conditions are met:

- Substance is included in the REACH Candidate List, and
- Collins Aerospace Engineering has identified the substance is present or at high risk of being present in Articles produced and/or imported at a concentration above 0.1% w/w, and
- The total amount of the substance present in all Articles produced and/or imported, which contain more than 0.1% w/w of the substance, exceeds 1 tonne per year for the producer/importer as a legal entity.

If the SBU site is a downstream user of a substance of very high concern on the Authorization List (REACH Annex XIV) under an authorization held by an actor up its supply chain, the SBU site must notify its use to ECHA under Article 66 of REACH.

Note: Notification of substances in Articles shall be made to ECHA no later than 6 months after it has been included on the Candidate List.

5.4 Communication of information on Substances in Articles

Per Article 33 of REACH, SBU's must provide information to allow safe use for downstream users of Articles if the following two conditions are met:

- Substance is included in the REACH Candidate List, and
- Collins Aerospace Engineering has identified the substance is present or at high risk of being present in Articles produced and/or imported at a concentration which exceeds 0.1% w/w.

SUIs must be created, reviewed and approved through a Collins Aerospace centralized process that has been established by the Collins Aerospace REACH PMO and Green Products Office to ensure consistency across Collins Aerospace. SBUs must use the global REACH SharePoint site

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to access the SUI request form:

https://global.utas.utc.com/sites/OPS_REACH/Lists/SafeUseInstructionRequest/AllItems.aspx

Safe use instruction can be accessed from the following location:

<https://utcaerospacesystems.com/reach-compliance/>

The obligations to communicate information on substances in Articles also apply to packaging materials (e.g. shipping containers), ground support equipment, and test equipment.

Collins Aerospace will provide the information in a format and process that will ensure the information is readily available to the recipient of the Article.

Providing the information electronically will be the preferred format. However, any method in which the customer receives the information will be acceptable.

Examples of how substance declaration and Safe Use Instructions can be communicated:

- Shipping documents
- Company website
- E-mail
- Inclusion in packaging

5.5 Obligation to Retain Information

Each SBU shall assemble and retain all the information required to carry out its duties for a period of at least 10 years after they last manufactured, imported, supplied or used the REACH Candidate List substance or preparation.

The information required is with respect to the Candidate List substance, preparation or formulation information captured from the supplier and used to determine compliance under the REACH regulation.

The SBU shall keep this information secure and available for review.

6.0 **SUPERSEDED DOCUMENT(S)**

COL-ENG-PRO-0006-00

7.0 **FLOWCHART(S)**

None

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8.0 **REVISION HISTORY**

00	Initial Issue	January 2, 2019
01	Kaizen Event minor edits	February 3, 2020

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