



How to live with REACH constraints for the space projects

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SUMMARY

- **Space projects status**
- **REACH business (organisation, tools, technical point and RH)**
- **Article 33 Issues**
- **Article 66 Issues**
- **Waste directive**
- **Conclusion**

Space projects status

Positive evolutions:

→ Better consideration at projects level

- Understanding of actions/files
- Reflex to ask supply chain

← “ECSS effects”

To be improved:

- Lessons learned from one project to the other
- SME and Labs activities
- Follow REACH evolution/project duration

← Traceability

← Authorisation, exemption

← Not a one shot

REACH business

Positive evolutions:

→ Efficient organisation at European level

- MPTB and WG's (lead, chromates, Hydrazine, obsolescence)
- Collaboration GIFAS , EUROSPACE, DGA, EDA
- REACHLaw support

Negative facts:

- Very long answer delay for authorisation/exemption file
- Twice a year candidate list evolutions → update needed

REACH business

Positive evolutions:

→ Efficient Tools

- Crosschecks
- Data bases → to share information → ESMDB/Matrex

Negative facts:

- Sometime no visibility on reformulation or very low substance level
- Redondant works ← Industrials, agencies

REACH business

Positive evolutions:

→ Organisation/RH

- Take into account in our business
- Dedicated RH

← CNES organisation

Negative fact:

- Anticipation → risk to wait the last moment to move

REACH business

Positive evolutions:

→ Technical aspect

- Solutions to obsolescence available
- Technical dedicated RH

← R&T studies

To be improved:

- Need to move on the design versus new materials/ new technologies
- Need to review process or move on procedure (Alodine) → the right need
- Share re-qualification between industrials/agencies

Article 33 Issues

Positive evolutions:

→ Better consideration within supply chain

- Asking/supply
- CNES support (templates, analysis)
- Better risk anticipation on materials and processes used in space sectors

To be improved: still labs and SME

- Are not enough aware of Article 33 and their obligations
- Are not organised and dimensioned to handle that work

Article 33 Issues

Negative facts:

- Article 33 management on ground hardware
 - No information
 - On the shelf materials/equipements

Specific business:

- International collaborations, many exchanges

Article 66 Issues

To improve:

- Wait first authorisation granted (chromates)
 - Process to set up
 - Time needed...
 - Low visibility on this constraint

Article 9 waste directive

Negative facts: low visibility

- Wait ECHA data base (2020)

- Supplier chain not aware
- Exemption or not for flight equipments
- Ground hardware
- Need RH
- Link with article 33 ?

Conclusions and outlooks

REACH brings many constraints and requirements on space projects for a long time

→ Risk anticipation on materials and processes used in space sectors

→ Article 33, 66 and waste directive management need to be improved

→ Feed back from ECHA and EC needed

Implies internal organisation implementation as well as extra human resource and specific competence set up.

Therefore we have to work together on how to share datas on materials and processes, how to ensure traceability of documents and exchange on our experience.

Thanks for your attention

