Chemical Business Association

100 YEARS 1923 - 2023

REACHLAW

COMPLIANCE. SUSTAINABILITY.

How the European Space Sector Keeps Pace

REACHLaw support to the European Space Agency (ESA)



25th October 2023 | Chemical Regulations and Sustainability Symposium 2023 | Manchester, UK

How the European Space Sector keeps pace

Agenda

1. Introduction
2. Monitoring/Risk Assessment
3. Compliance
4. Advocacy
5. Outlook
6. Conclusions



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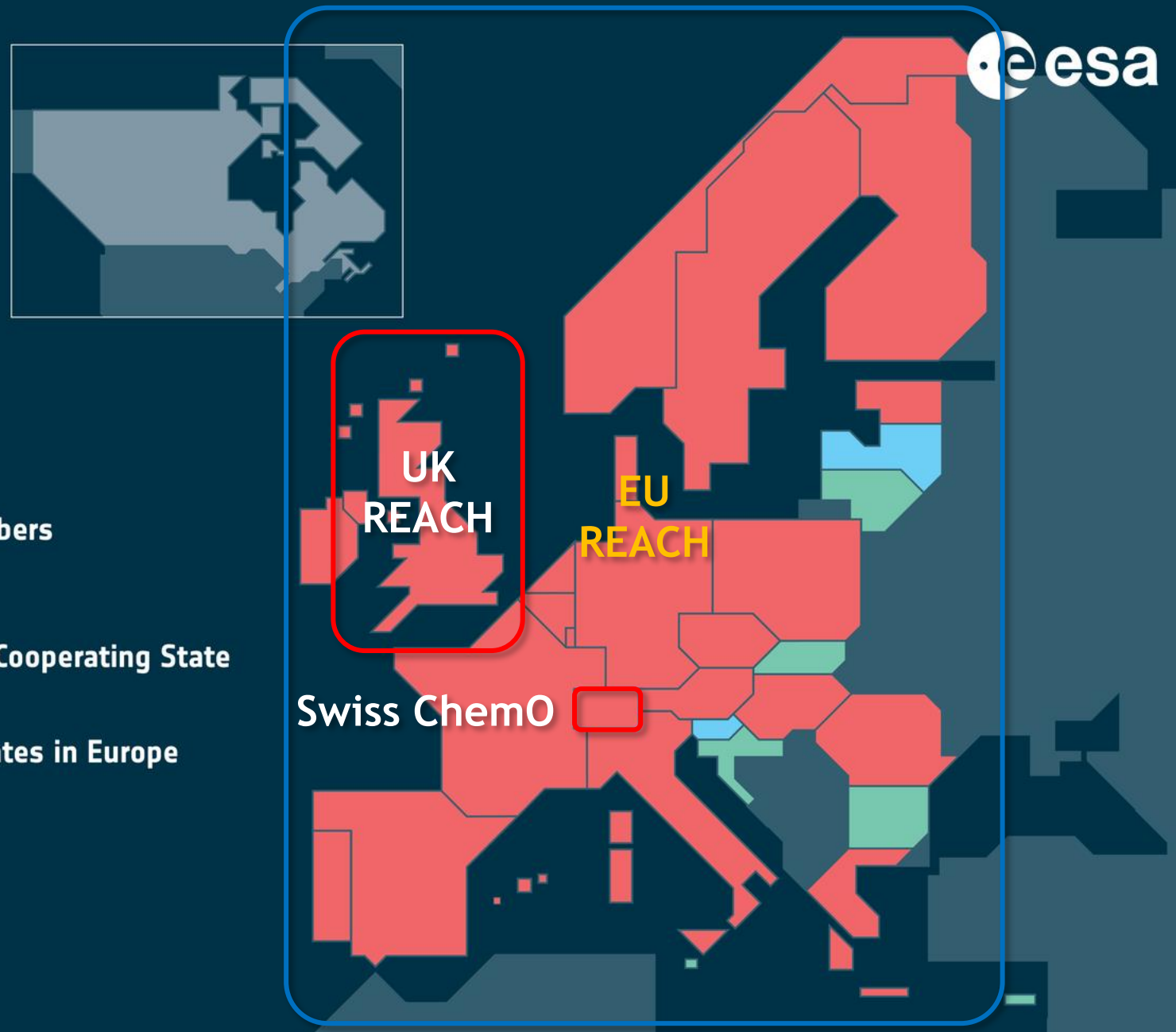
Regulatory Jurisdictions

- **EU REACH**
- UK REACH
- Swiss ChemO



Member States
Austria
Belgium
Czech Republic
Denmark
Estonia
Finland
France
Germany
Greece
Hungary
Ireland
Italy
Luxembourg
The Netherlands
Norway
Poland
Portugal
Romania
Spain
Sweden
Switzerland
United Kingdom

Associate Members
Latvia
Slovenia

Long-standing Cooperating State
Canada

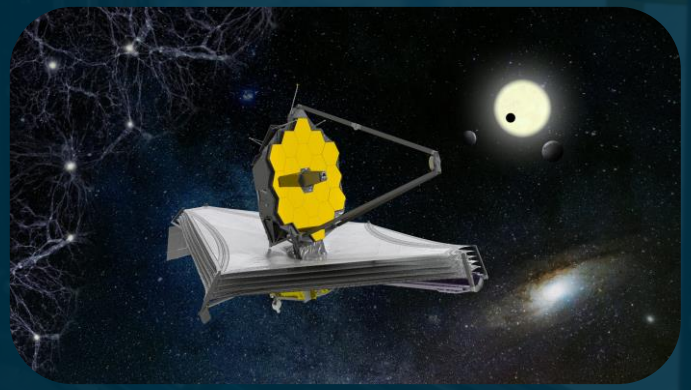
Cooperating States in Europe
Bulgaria
Croatia
Cyprus
Lithuania
Malta
Slovakia

Source: https://www.esa.int/ESA_Multimedia/Images/2021/06/ESA_Member_States

Introduction
European Space Agency

- ESA does **not** build anything, but is rather the end user
  - Industry builds spacecraft through a complex supply chain
- ESA projects can take >15 years
  - At odds with REACH timelines
- REACH-driven obsolescence can be very costly, so ESA helps industry mitigate these risks through the MPTB
  - Materials and Processes Technology Board of the European Space Components Coordination (ESCC)





Source: https://www.esa.int

Materials and Processes Technology Board (MPTB)

Members

- Consortium of materials experts from the space industry/agencies, chaired by ESA

Agencies

esa

cnes

DLR

asi agenzia spaziale italiana

Industry

ASD-EUROSPACE The Space group in ASD

AIRBUS DEFENCE & SPACE

ThalesAlenia Space

AVIO

ariane GROUP

OHB

beyond gravity

MT AEROSPACE

sener

TESAT

Observers

EUROPEAN DEFENCE AGENCY

MAP SPACE COATINGS

LEONARDO

Support/Project Management

REACHLAW

Materials and Processes Technology Board (MPTB) Task Forces

MPTB

Chaired by esa

Task Forces

Chaired by REACH LAW

- Chromates Task Force (STF)
- Lead Task Force (LTF)
- Waste Framework Directive/SCIP Task Force (WFD TF)
- Energetic Materials Working Group (EMWG) *including former Hydrazine TF*
- Chemicals Strategy for Sustainability Focus Group (CSS FG)
- REACH Restrictions Task Force (RTF) including PFAS, Bisphenols & D4/D5/D6

cnes

- Obsolescence Splinter Group (OSG)

esa

- European Space Materials Database Steering Board (ESMDB)
- Long Term Storage Splinter Group (LTS)
- Materials Space Environmental Survivability Working Group

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Monitoring/Risk Assessment
Overview

Communication



- MPTB plenary meetings, Regulatory updates:
  - EU REACH
  - Green Deal initiatives
  - UK REACH
  - Swiss ChemO
- MPTB Task Forces

Regulatory Monitoring



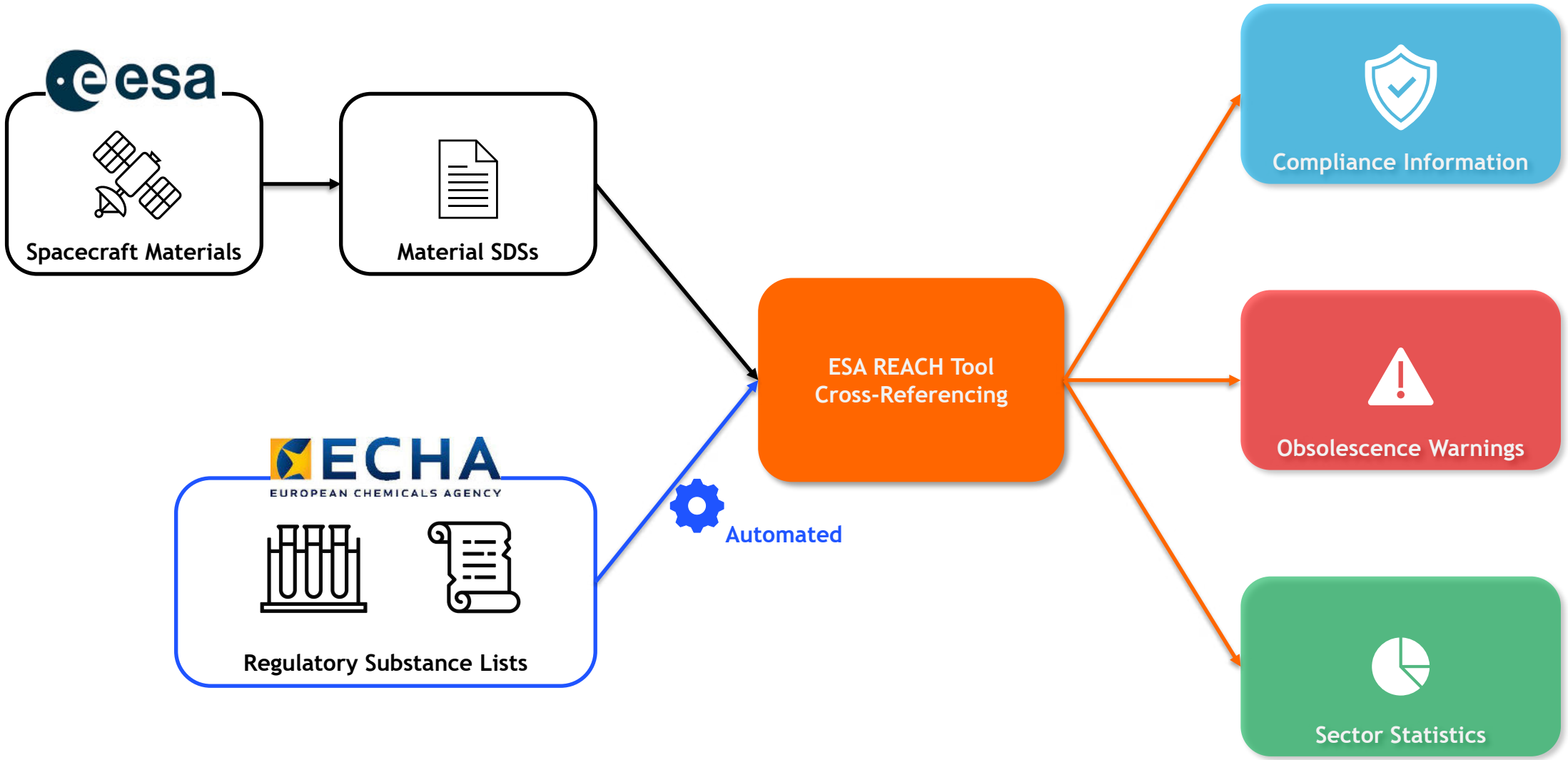
- Candidate List
- ECHA intentions
  - Restrictions
  - SVHC
- Chemical Watch

Obsolescence Management



- ESA REACH Tool
- Obsolescence Splinter Group
- Energetic Materials Working Group

Obsolescence Management ESA REACH Tool



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Compliance
Best Practice Guidance



Chromates

"Continued use of chromium trioxide in chemical conversion coatings for space hardware after the REACH authorisation sunset date"



Minimum Article 33 Template

"REACH Article 33 Declaration on Substances in Articles" [including SCIP]



SCIP Submission

"Best Practice Guidance for the European Space Sector to comply with SCIP Notification"

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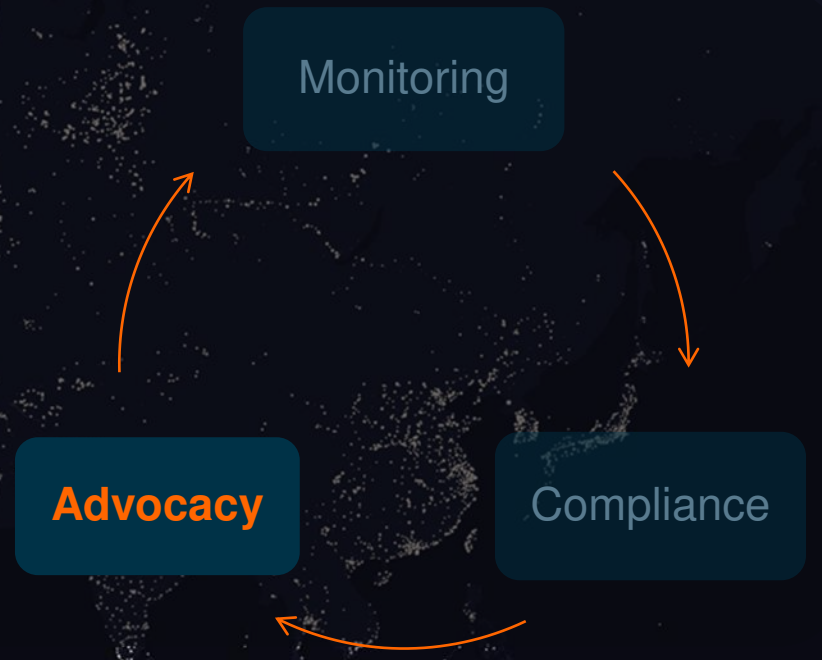


Advocacy
Space sector perspective

- ✓ Very low volumes
- ✓ Dependant on other sectors
- ✓ Strategic
- ✓ Little to no waste on Earth
- ✓ Closed systems
- ✓ Very low emissions

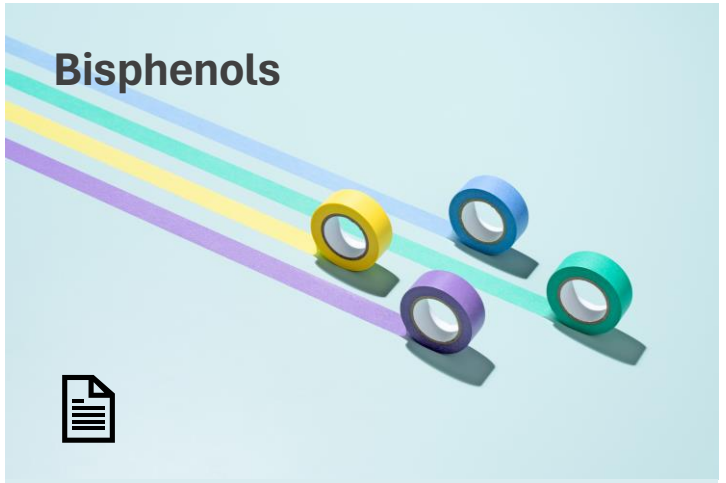
REACHLaw helps the European Space Sector's voice be heard through answering ECHA/EC **public consultations**



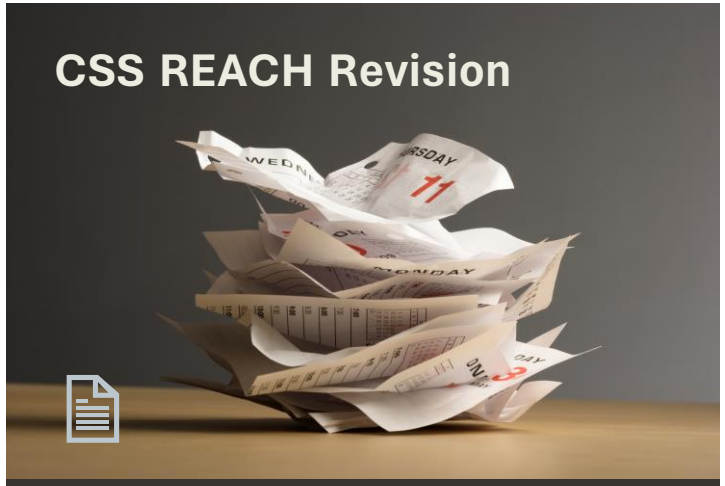
Advocacy
Recent Initiatives



"European Space Sector comments on the Annex XV restriction report for per- and polyfluoroalkyl substances (PFAS)"



"European Space Sector comments on the REACH restriction proposal for certain bisphenols"



"European Space Sector feedback on the CSS REACH Revision – Position Paper"

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How the European Space Sector keeps pace
Outlook

- Focus shifting to broad **group restrictions**
- Increasing EU vs UK regulatory **divergence**
- Further **sustainability** related requirements
  - Ecodesign/Life Cycle Assessment
- **Awareness** raising
  - SME training
  - 5th ESA REACH Workshop (Noordwijk, June 2024)



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How does the European Space Sector keep pace?

Conclusions



REACHLaw Support



Regulatory Monitoring



ESA REACH Tool



Best Practice Guidance



Space Sector Advocacy

How does the European Space Sector keep pace?
Further Reading

- Eurospace
- 4th ESA REACH Workshop
- Chemical Watch article on Automated Obsolescence Management



Thank you for listening!

Any Questions?

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REACHLAW

We Specialize in Chemical Regulatory Compliance and Sustainability