



European association for Surface Treatment on Aluminium

# **European Aluminium Surface Treatment and the current legislative context**

**Michiel Koot  
ESTAL Director**



European association for Surface Treatment on Aluminium

## My presentation today:

- ESTAL 2017 in a few words
- Current legislative challenges



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## Who is Michiel Koot ?

- Dutch citizen
- Former Anodiser
- Member of the Board of Dutch Surface Treatment Association
- Member of ESTAL Executive Committee
- ESTAL Director since October 2013



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## ESTAL leadership team 2017-2020

**José Almeida**  
ESTAL President  
2017-2020



**Dr. Metin Yilmaz**  
Vice-President  
2017-2020



**Michiel Koot**  
Director  
since Oct. 2013





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## ESTAL's role in 2017

- Defends the interests of anodisers and powder coaters (national associations & direct members)
- Welcomes suppliers of aluminium surface treatment as members
- Cooperates with quality label organisations (JTC)
- Since 1.1.2016 ESTAL is a Member of



EUROPEAN ALUMINIUM



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## ESTAL 2017: 11 Full members:



Hungarian Aluminium Surface Treaters' Association

H-1138 BUDAPEST Népfürdő st. 19/A. 1/4.

Tel +36 30 9 590 575 [www.afmsz.hu](http://www.afmsz.hu)



ASSOCIAÇÃO PORTUGUESA DO ALUMÍNIO



NEF



NORSKE ELOKSERINGSBEDRIFTERS FORENING





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## ESTAL 2017: 7 Associate members:

**Denmark**



**Sweden**

**sapa:**

Profil  
Gruppen.

**Slovenia**



**impol**  
Aluminium Industry

**Slovakia**

**sapa:**

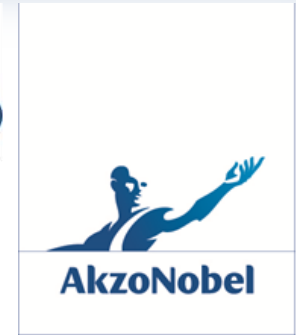
**Tunisia**





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## ESTAL 2017: 10 Sustaining members:







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## **2. Current legislative challenges**

- **Circular Economy Package**
- **REACH**
- **IED / BREF for surface treatment**

## **2.1 Circular Economy**

- EU Package: December 2015
- Circular economy = a system of resources utilization where reduction, reuse and recycling of elements prevails
- Proposals on waste: reduce landfilling, increase recycling and re-use



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## Circular Economy

- **Proposals on waste: reduce landfilling, increase recycling and re-use**
- **EA in favour of setting ambitious 2025 and 2030 targets for Construction and Demolition Waste (C&DW)**

## Circular Economy

- Opportunity for metals **and for aluminium!**



**Primary aluminium**



**Recycled aluminium**

## Challenges for Surface Finishing

### **Surface finishing processes fit for recycling?**

- Maintain high quality anodizing / coating
- Chemical substances, pigments

### **Recycled aluminium fit for surface finishing?**

- Residues of wastes / „pepper and salt“ alloy elements
- Primary vs recycled for anodisation:
- Primary vs. Recycled for powder coaters:

## Conclusions Circular Economy

Emphasis on the re-use and recycling in EU legislation:  
big **opportunity** for aluminium for building for surface  
treatment

However, **technical challenges** for good quality surface  
treatment of recycled aluminium

## 2.2 REACH

2006: Make Europe safer by phasing out or controlling (through authorisations) the use of dangerous substances

- **Registration:** “no data, no market” – 3 deadlines
- **Evaluation:** CoRAP (community rolling action programme)
- **Authorization:** SVHC, Candidate list, Annex XIV
- **Restriction:** Annex XVII

## 10 years REACH: Review / REFIT

- Criteria: Effectiveness, efficiency, relevance, coherence and EU Added value
- Basis for developing the non-toxic environment strategy.

### **Public consultation: ESTAL contributed concerns:**

- Risk of substance withdrawal
- Need for workable Safety data sheet
- Need for upstream authorization
- Predictability



## Concerns for alu surface treatment

*Registration:* Risk of substances disappearing from the market

*Evaluation* of substances relevant for surface treatment: TiO<sub>2</sub>, CeO<sub>2</sub>, Al<sub>2</sub>(SO<sub>4</sub>) SnSo<sub>4</sub>, H<sub>2</sub>SO<sub>4</sub>, Cobalt, Nickel compounds.

*Restrictions* for specific uses (e.g. for toys) files prepared by authorities, e.g. Cobaltsulphate?

## Concerns for alu surface treatment

Relevant for alu surface treatment: CR6 compounds

Substance to be included in *Annex XIV* (authorisation list)

- **Sunset dates:** substance cannot be used after sunset date unless authorisation given to an applicant for a specific use
- **Latest application date LAD:** (for phase-in substance)

## REACH: Chromates

- On Annex XIV (authorisation list) since 2013
- CrO<sub>3</sub>: Sunset date 21.9.2017  
(After 21.9.2017, CrO<sub>3</sub> can no longer be used, unless authorisation granted or applied for)
- Latest date for Application for Authorisations (AfA's) was 21.3.2017
- Many AfA's have been filed (CTAC Consortium, Grohe, Reachlow, Hapoc, Rimex...)

## Current status of the CTAC AfA

- Chromium Trioxide Authorisation Consortium CTAC (Lanxess and others) represents 100% of imports in EU.
- Upstream AfA for specified downstream uses
- ECHA authorities not happy with upstream approach
- No official decision expected before End of 2017.
- CrO<sub>3</sub> users should make sure that their CrO<sub>3</sub> supplier is a member of CTAC and work according to Best practice sheet published on [www.jonesdayreach.com](http://www.jonesdayreach.com)



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## ESTAL on Chromates

Substantial number of ESTAL powder coaters are still using CR6 as conversion layer before powder coating

Double track decision: *“CR6 has a long track record of extending the life of aluminium in buildings. Until alternative systems demonstrate a comparable track record, we believe its used should continue.”*

ESTAL monitors developments but is not involved in specific AfA.

## REACH: Registration for small volumes

- 1 tonne per year
- Final deadline: 31. 5. 2018
- Pre-registration possible until 31.5.2017
- Impact on downstream users?
- Risk of substances disappearing ?

## 2.3 IED Industrial Emissions Directive

- IED includes the former IPPC Directive (Integrated Pollution Prevention and Control)
- Aluminium finishing within scope of IED (chemical process vats > 30m<sup>3</sup>)
- BREF: Reference Documents on Best Available Techniques:  
New BREFs contain **CONCLUSIONS** which are legally binding for authorities when issuing permits.



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## IED Industrial Emissions Directive

- BREF's Conclusions will focus on Key Environmental Issues (KEI)
- Priority will be given to Emissions Levels Associated with BREF (so called BAT-AELs)
- BREF on surface treatment on metals and plastics (2006) likely to be reviewed from 2018 onwards.
- Alu Surface treatment industry should get organised





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## **CONCLUSIONS**

- **Circular Economy is a challenge and an opportunity for Aluminium and for Aluminium Finishing**
- **European legislations such as REACH and IED continues to have considerable impact on surface treatment**
- **ESTAL is monitoring European legislative development and is making the voice of its members heard.**



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