



A United Technologies Company

REACH ASSESSMENT PROGRAM

Registration, Evaluation, Authorization, and Restriction of Chemicals

Background

To evaluate the risk of business disruption due to REACH non-compliance across our supply chain, we have included REACH content supplier assessments. Supplier assessments are scheduled based on location, type of work performed for P&W, and previous assessment results. The highest risk suppliers will receive more frequent and more comprehensive reviews. Assessment focus areas are: overall system to manage REACH in supplier's own facility and sub-tier supply base, safe-use communications outside of the P&W shipping system, substance declarations, authorizations for the use of substances that have sunset or will soon sunset and management of government reporting obligations, as applicable.

The following request is per the latest UTC terms and conditions found in the following link: <http://www.utc.com/Suppliers/Pages/Terms-and-Conditions.aspx>

Assessment Date: _____

Name of Assessor: _____

Organization: Supplier Development/Field Rep Quality Other _____

Supplier Name: _____

Site Address: _____

Vendor Code: _____

Site REACH Contact: _____

Phone: _____

Email: _____

Customer: PWC PWA Both

Processes (Mark all that apply): Original Equipment Manufacture Maintenance, Repair, Overhaul (Aftermarket Activities)



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Latest Terms and Conditions Nov. 2016	Q#	Applies to	Question	Auditor Guidance	Conclusion
25.1	1	This question applies to all suppliers	Does the Supplier have an effective process to monitor the REACH regulation, assess applicability to the supplier's business and comply with its requirements?	1a. Does the supplier have and can the supplier demonstrate a regulatory monitoring system Yes No 1b. Can the supplier adequately explain how they determine whether/how REACH applies to their business? Yes No 1c. Can the supplier provide an example of action taken to comply, if required Yes No A yes to 1a, 1b, and 1c is OK. A "no" in 1a, 1b, or 1c is Opportunity.	Ok Opportunity for Improvement N/A N/E
<p>Assessor: Please very briefly describe the supplier's process to monitor the REACH regulation and determine if chemical substances on the Candidate list are used in their manufacturing process (You may attach additional sheets and/or include screenshots, if necessary, to provide required information):</p>					
	2	This question applies to Design Responsible suppliers. This question is N/A for Build to Print suppliers. This question is N/A for MRO ONLY suppliers;	For PWA / PWC OEM parts ONLY: Does the Supplier have a process to identify and provide P&W with a declaration of substances on the Candidate List that are used in products it designs for P&W?	2a. Does the supplier have a process in place to track Candidate List substances used in products it designs for P&W? Yes No If "yes", continue to 2b. If "no", this is an Opportunity. 2b. Does the supplier have a process to calculate if substance weight exceeds 0.1% of the part (article) weight? Yes No If "yes" to 2b is OK. If "no" this is an Opportunity	Ok Opportunity for improvement N/A N/E

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<p>25.1 25.2 25.6</p>	<p>This question applies to all suppliers.</p>	<p>For PWA / PWC OEM and/ or MRO parts ONLY: Does the Supplier provide safe use information to recipients of articles shipped to or within the EEA?</p> <p>3a. Does the supplier ship to or within the EEA? Yes No If "yes", continue to 3b. If not, this question does not apply.</p> <p>3b. Does the supplier ship articles that contain greater than .1% of an SVHC? Yes No If "yes", continue to 3c. If not, this question does not apply.</p> <p>3c. Can the supplier demonstrate communication of safe use information for articles that contain greater than .1% of an SVHC to/within the EEA? Yes No A "yes" to 3c is OK A "no" is Opportunity (For P&W Build to Print suppliers: Safe Use information is provided if shipping via PW Supplier Portal/SNC; if not shipping via SNC, Safe Use information can be downloaded from P&W REACH websites)</p>	<p>Assessor: Please very briefly describe the systems / processes supplier has in place in order to respond to declaration request (You may attach additional sheets and/or include screenshots, if necessary, to provide required information):</p> <p>Ok Opportunity for Improvement N/A N/E</p>
<p>Assessor: Please very briefly describe supplier's process for providing Safe Use Info to the article recipients. (You may attach additional sheets and/or include screenshots, if necessary, to provide required information.):</p>			

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<p>25.1 25.2 25.6</p>	<p>This question applies to all suppliers.</p>	<p>Does the Supplier have an effective process to monitor its sub tier suppliers' compliance with the REACH regulation?</p>	<p>4a. Does the supplier have sub-tiers? Yes No If "yes", to 4a, continue to 4b. If "no", question is not applicable.</p> <p>4b. Can the supplier demonstrate a process/system that verifies supplier is monitoring their sub tiers compliance with REACH? Yes No A "yes" to 4b is OK A "no" to 4b is Opportunity</p>	<p>Ok Opportunity for Improvement N/A N/E</p>
<p>25.1 25.2</p>	<p>This question applies to suppliers located in the EEA.</p>	<p>For P&W / PWC OEM and/ or MRO parts ONLY: Is the Supplier importing or using any banned Annex XIV substances in accordance with a government-issued Authorization?</p>	<p>5a. Is the supplier using/importing banned Annex XIV substances both on products and in manufacturing processes? Yes No If "yes", continue to 5b. If "no" question does not apply.</p> <p>5b. Can the supplier provide an authorization or authorization application number for banned substances? Yes No Authorization Example: REACH/14/1/0 Application Example: 0001-01 A "yes" to 5b is OK A "no" is an Opportunity</p>	<p>Ok Opportunity for Improvement N/A N/E</p>

Assessor: Please very briefly describe the supplier's process to monitor sub tiers' compliance to the REACH regulation (You may attach additional sheets and/or include screenshots, if necessary, to provide required information):

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25.1	6	<p>This question applies to suppliers located in the EEA.</p>	<p>For ECHA reporting obligations: REACH Article 7(2), does the supplier have a process to track and report the required information to ECHA?</p>	<p>6a. Does the supplier import or ship products containing substances on the Candidate list >.1%? Yes No If "yes" continue to 6b. If "no", then question is not applicable.</p> <p>6b. Does the supplier import or ship greater than 1 tonne per calendar year of any candidate list substance in articles? Yes No If "yes" continue to 6c. If "no", then question is not applicable.</p> <p>6c. Did the supplier report to ECHA per article 7? Yes No A "Yes" to 6c is OK A "No" is Opportunity</p>	<p>Ok Opportunity for improvement N/A N/E</p>
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Assessor: Please note Authorization/ Application numbers for each substance used, if provided (You may attach additional sheets and/or include screenshots, if necessary, to provide required information.);

Assessor: Please briefly describe supplier's process to track and report information to ECHA, if required (You may attach additional sheets and/or include screenshots, if necessary, to provide required information.);

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Glossary

SVHC: Substance of High Concern.

Cat1: Design responsible supplier

BTP: Build to print supplier (P&W design)

EEA: European Economic Area

N/A: Not applicable

N/E: Not evaluated

OEM: Original Equipment Manufacturer

MRO: Maintenance, Repair and Overhaul

Annex XIV List: Substances that are banned within the European Economic Area (EEA) and can only be used with proper authorization from ECHA. Articles containing substances on the Annex XIV List require safe use information if shipping to or within the European Economic Area. (See link below)

Candidate List: Substances identified by ECHA to be substances of very high concern (SVHC) and hazardous to human health and the Environment. Articles containing >.1% of any substance on the Candidate List require safe use documentation if shipping to/from or within the EEA. (See link below)

Declaration: Information provided on request by a supplier to its customer about REACH-regulated substances in its products or processes that enables the customer to comply with its REACH regulatory obligations..

ECHA: European Chemicals Agency – Regulatory agency that administers the REACH regulation on behalf of the European Union. <https://echa.europa.eu/>

PWA REACH Site: http://www.pw.utc.com/REACH_and_Materials_of_Concern

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PWC REACH Site: <http://www.pwc.ca/en/REACH>

Safe use information: Information for the recipient of an article on how to use the article safely.
Required for parts shipped to/within the EEA that contain greater than 0.1% of the Candidate list substance (SVHC).

Risk/Intent of the Questions:

Question	REACH Compliance	Business Risk
1	REACH Management	Risk of business disruption for non-compliance. REACH is a dynamic/complex regulation, with numerous deadlines and requirements that extend up/down the supply chain.
2	Substance Declaration to P&W	Required for Safe Use Documents (design-responsible suppliers) and Authorization of substance use (build to print suppliers)
3	Safe Use Information	Non-compliance could prevent a supplier from shipping parts containing regulated substances to/within the EEA
4	Sub Tier Monitoring	Evaluates the supplier's management of REACH risk with its suppliers, just as P&W is doing with its first-tier suppliers
5	Valid Authorizations for Banned Substances	Evaluates an EEA supplier's ability to legally procure and use a substance needed to manufacture or repair P&W parts.
6	Annual Reporting to ECHA	Evaluates an EEA supplier's ability to comply with annual government reporting obligations, if applicable.

Example of Application Numbers
Application Number Format: ##### - ##

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Application Number	Name	CAS Number	Applicant(s)	Use name	Status	Entry Nr In Annex XIV
0001-01	Bis(2-ethylhexyl) phthalate (DEHF)	117-81-7	Rolls-Royce plc	The processing Commission	4	
0002-01	Bis(2-ethylhexyl) phthalate (DEHF)	117-81-7	ARKEMA FRANCE	Formulation of Application v	4	
0002-02	Bis(2-ethylhexyl) phthalate (DEHF)	117-81-7	ARKEMA FRANCE	Industrial use Application v	4	
0003-01	Bis(2-ethylhexyl) phthalate (DEHF)	117-81-7	Grupa Azon Zakłady Azotowe Kędzierzyn S.A.	Formulation of Pending decl	4	
0003-02	Bis(2-ethylhexyl) phthalate (DEHF)	117-81-7	Grupa Azon Zakłady Azotowe Kędzierzyn S.A.	Industrial use Pending decl	4	

Example of an Authorization number:
Authorization Number Format: REACH/##/##/##

Date of decision	Substance name	Holder of the authorisation	Authorisation number	Authorised use	Date of expiry of review period	Reasons for the decision
7 August 2014	Bis(2-ethylhexyl) phthalate (DEHF) EC No: 204-211-0 CAS No: 117-81-7	Rolls-Royce plc PO Box 31, Derby Derbyshire DE24 0BJ UNITED KINGDOM	REACH/14/1/0	Processing of a stop-off formulation containing DEHF during the diffusion bonding and manufacture of aero engine fan blades	21 February 2022	— Rak is adequately controlled in accordance with Article 60(2) of Regulation (EC) No 1907/2006. — There are no suitable alternatives at present and search for technically feasible alternatives is ongoing under a 5-10 year research programme.

<https://echa.europa.eu/applications-for-authorisation-previous-consultations>

Annex XIV List Page

Link:
<https://echa.europa.eu/authorisation-list>

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Substances on the Annex XIV List

Name	EC no.	CAS no.	Entry no.	Label application date	Start Date
5-tert-butyl-2,4,6-trimethyl-xylylene (Musk xylene)	201-239-4	81-152	01	21/02/2013	21/02/2014
4,4'-Diaminodiphenylmethane (MDA)	202-914-4	103-77-9	02	21/02/2013	21/02/2014
Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified: Alpha-hexabromocyclododecane EC no. 1-10407-05-8	.	.	03	21/02/2014	21/02/2015
Hexabromocyclododecane EC no. 1-10407-05-8
1,2,5,6,9,10-hexabromocyclododecane EC no. 201-889-9 CAS no. 3194-91-4
Hexabromocyclododecane EC no. 301-064-03 EC no. 25017-88-4
Alpha-hexabromocyclododecane EC no. 1-10407-04
Bis(2-ethylhexyl)phthalate (DEHP)	204-211-0	117-81-7	04	21/02/2013	21/02/2015
Benzyl butyl phthalate (BBP)	205-623-7	85-68-7	05	21/02/2013	21/02/2015
Diethyl phthalate (DEP)	201-557-4	84-74-2	06	21/02/2013	21/02/2015

Candidate List page
Link: <https://echa.europa.eu/information-on-chemicals/candidate-list-substances-in-articles-table>
Example of substances on Candidate List

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Name	CAS Number
Bis (2-ethylhexyl)phthalate (DEHP)	117-81-7 25937-99-4 67134237-50-6 67134237-51-7 77134237-52-8
Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified: Alpha-hexabromocyclododecane, Beta-hexabromocyclododecane, Gamma-hexabromocyclododecane	
Aluminosilicate Refractory Ceramic Fibres (see fibres covered by index number 650-017-00-8 in Annex VI, part 3, table 3.1 of Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, and fulfil the three following conditions: a) oxides of aluminium and silicon are the main components present (in the fibres) within variable concentration ranges b) fibres have a length weighted geometric mean diameter less than two standard geometric errors of 6 or less micrometres (µm) c) alkaline oxide and alkali earth oxide (Na2O+K2O+CaO+MgO+BaO) content less or equal to 18% by weight	
Diisobutyl phthalate (DBP)	84-74-2
Diisobutyl phthalate	84-69-5
Boric acid	10043-35-3 3711113-50-1
Diazene-1,2-dicarboxamide (C.C.-azodi(formamide)) (ADCA)	123-77-3
Disodium tetraborate, anhydrous	1303-56-4 1330-43-4 12179-04-3
1-Methyl-2-pyrrolidone	872-50-4
Lead titanium zirconium oxide	12626-81-2
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8
Bis(pentabromophenyl) ether (decabromodiphenylether) (DecaBDE)	1163-19-5
Diboron trioxide	1303-86-2
Lead monoxide (lead oxide)	1317-36-8
2-(2H-benzotriazol-2-yl)-4,6-diterphenylphenol (UV-328)	25973-55-1
4-Nonylphenol, branched and linear, ethoxylated (substances with a linear and/or branched alkyl chain and a nonylphenol head group) EC no. 201-827-05 EC no. 201-827-06 EC no. 201-827-07 EC no. 201-827-08 EC no. 201-827-09 EC no. 201-827-10 EC no. 201-827-11 EC no. 201-827-12 EC no. 201-827-13 EC no. 201-827-14 EC no. 201-827-15 EC no. 201-827-16 EC no. 201-827-17 EC no. 201-827-18 EC no. 201-827-19 EC no. 201-827-20 EC no. 201-827-21 EC no. 201-827-22 EC no. 201-827-23 EC no. 201-827-24 EC no. 201-827-25 EC no. 201-827-26 EC no. 201-827-27 EC no. 201-827-28 EC no. 201-827-29 EC no. 201-827-30 EC no. 201-827-31 EC no. 201-827-32 EC no. 201-827-33 EC no. 201-827-34 EC no. 201-827-35 EC no. 201-827-36 EC no. 201-827-37 EC no. 201-827-38 EC no. 201-827-39 EC no. 201-827-40 EC no. 201-827-41 EC no. 201-827-42 EC no. 201-827-43 EC no. 201-827-44 EC no. 201-827-45 EC no. 201-827-46 EC no. 201-827-47 EC no. 201-827-48 EC no. 201-827-49 EC no. 201-827-50 EC no. 201-827-51 EC no. 201-827-52 EC no. 201-827-53 EC no. 201-827-54 EC no. 201-827-55 EC no. 201-827-56 EC no. 201-827-57 EC no. 201-827-58 EC no. 201-827-59 EC no. 201-827-60 EC no. 201-827-61 EC no. 201-827-62 EC no. 201-827-63 EC no. 201-827-64 EC no. 201-827-65 EC no. 201-827-66 EC no. 201-827-67 EC no. 201-827-68 EC no. 201-827-69 EC no. 201-827-70 EC no. 201-827-71 EC no. 201-827-72 EC no. 201-827-73 EC no. 201-827-74 EC no. 201-827-75 EC no. 201-827-76 EC no. 201-827-77 EC no. 201-827-78 EC no. 201-827-79 EC no. 201-827-80 EC no. 201-827-81 EC no. 201-827-82 EC no. 201-827-83 EC no. 201-827-84 EC no. 201-827-85 EC no. 201-827-86 EC no. 201-827-87 EC no. 201-827-88 EC no. 201-827-89 EC no. 201-827-90 EC no. 201-827-91 EC no. 201-827-92 EC no. 201-827-93 EC no. 201-827-94 EC no. 201-827-95 EC no. 201-827-96 EC no. 201-827-97 EC no. 201-827-98 EC no. 201-827-99 EC no. 201-827-100	
Orange lead (lead tetroxide)	1314-41-6
Lead chromate molybdate sulphate, red (C.I. Pigment Red 104)	12956-85-8
Lead sulphochromate, yellow (C.I. Pigment Yellow 34)	1344-37-2
Benzyl butyl phthalate (BBP)	85-68-7

Revision History:

Revised By	Date	Description of changes	Rev #
K. Bennett	01/16/2018	Updated to include MRO to the questionnaire.	Rev 6