



**VIA ELECTRONIC FILING**

**September 23, 2013**

**To the European Chemicals Agency,**

**RE: ECHA Consultation for REACH Annex XIV: Aluminosilicate Refractory Ceramic Fibres (AI-RCF)**

The Aerospace Industries Association (AIA) is pleased to submit comments on the draft recommendation for inclusion of Aluminosilicate Refractory Ceramic Fibres (AI-RCF) onto Annex XIV. Founded in 1919, AIA is the premier trade association representing over 350 major aerospace and defense manufacturers and suppliers and approximately 844,000 aerospace and defense workers. Our members represent the United States of America's leading manufacturers and suppliers of civil, military, and business aircraft, helicopters, unmanned aerial systems, missiles, space systems, aircraft engines, material, and related components, equipment services, and information technology.

Aluminosilicate Refractory Ceramic Fibres are currently used as heat and fire shields and as friction and thermal insulation materials, which are critical for aerospace and defense products such as engines, wheels, brakes, and engine nacelles. Other known applications include, but are not limited to high temperature coatings, foams, papers, adhesive tapes, and blankets.

AI-RCF is a critical substance that introduces serious safety and economic viability concerns if unavailable. Currently offered AI-RCF alternatives are limited and not suitable for all aerospace applications. In one specific aerospace application, smoke was generated, which was an unacceptable result. Other proposed alternatives have proven deficient in strength, friction, thermal protection, and fibre sizing (treatment) properties. Metallic replacements are heavier and do not provide comparable thermal insulation characteristics. Additional time is needed by the aerospace industry to continue to seek suitable alternatives for each application. Where potential alternatives have been identified, the evaluation, qualification and certification will take an additional five to ten years to complete, as extensive validation and certification for these systems is required by the United States Federal Aviation Administration (FAA) and the European Aviation Safety Agency (EASA). Implementation following certification takes several additional years. Developing alternatives for maintenance of legacy, out-of-production products is even more challenging, since the original design basis and requirements may not be fully understood or readily available.

The aerospace industry is committed to reducing the use of AI-RCFs where technically feasible. AIA member companies employ state of the art control and protective measures that minimize risks to workers and the environment. However, the



extensive industry resources are currently focused on chromates authorization application development.

Furthermore, the lack of EC or CAS numbers associated with this category of substance presents significant added burden to industry needing to identify all uses and users of these substances in complex supply chains.

Given the critical need for ongoing uses of AI-RCFs, the AIA asks for consideration of the industry's challenges as downstream users and establish application and sunset dates that are a minimum of five years after the chromate authorization dates in order to minimize the impact and allow industry to apply the lessons learned from the prior authorization applications to the process for AI-RCFs.

We appreciate your consideration of these comments. If you have any questions or need additional information, please do not hesitate to contact me at [leslie.riegle@aia-aerospace.org](mailto:leslie.riegle@aia-aerospace.org) or by phone 703-358-1088.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leslie Riegler', is positioned below the word 'Sincerely,'.

Leslie Riegler  
Director of Environmental Policy  
Aerospace Industries Association