



Brussels, 22 June 2026

Ms. Reet Ulm
Delegate of the Estonian Permanent Representation to the EU
Rue Guimard, 11/13
1040, Brussels, Belgium

Dear Ms. Ulm,

RE: ASD clarification suggestions on Terphenyl, hydrogenated restriction ahead of the REACH Committee discussion

The Aerospace, Security and Defence industries association of Europe (ASD) welcomes the European Commission's proposal following the 2023 ECHA opinion on the proposed REACH restriction of Terphenyl, hydrogenated (PHT). While we are pleased to see many of our industry's specificities and key priorities being reflected in the decision proposal, we would like to put forward some questions and suggestions to ensure the interpretation of the provisions is clear in advance of the upcoming REACH Committee discussion on the file expected for 25 June.

In general, ASD is concerned that the different language between the paragraphs might lead to unharmonized interpretation of the provisions directly relevant to Aerospace. Specifically, while paragraph 2 of the proposed Annex XVII amendment refers to a 10-year deferral for "*civilian aerospace applications*", point (a) of paragraph 4 of the same annex refers only to the "*civilian aircrafts*" placed on the market in virtue of the provisions under paragraph 2.

In order to avoid any confusion, we would urge the co-legislators to ensure consistency in language by using "*civilian aerospace products*" rather than limiting the provision to the aircrafts. The suggested language would ensure that also the relevant aerospace parts and components (original equipment or spare parts) are covered by the provision, as well as other civilian aerospace products such as ground equipment (e.g. radars) and spacecrafts or satellites.

Moreover, we would suggest clearly outlining that maintenance, repair and overhaul (MRO) should be considered as covered by the provisions under paragraphs 2 and 4 due to the requirement to 'repair as produced' covering aerospace products.

Conclusion

Based on the justifications provided above, we urge the co-legislators to:

- **Replace in point (a) of paragraph 4 “civilian aircrafts” with “civilian aerospace products” for alignment;**
- **Clarify that maintenance, repair and overhaul (MRO) activities are also covered by the provisions in paragraphs 2 and 4 of the Annex.**

ASD remains ready to respond to any follow-up questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Camille Grand', is written over a horizontal line.

Camille Grand,

Secretary General of ASD