

Introduction

Workshop on Streamlining Applications for Authorisation
17 November 2015

Thierry Nicot
European Chemicals Agency, Helsinki



Outline

 Developments since Lessons Learned Conference





2. Key principles



3. Upstream application – some thoughts



4. Take home







1. Since Lessons Learned conference

- The process
- Applications costs
- ECHA's actions
- Task Force



The process works

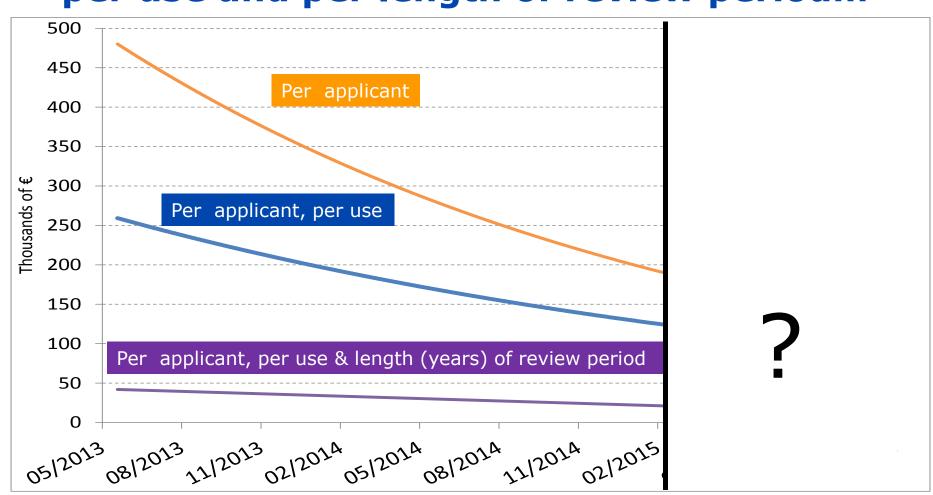
- ECHA's committees have completed 56 opinions
- The average time taken by the committees was 8 months
- Commission granted authorisation for 10 uses
- The process clearly has had positive impacts

We can do better

- The applications need to be even more 'fit for purpose'
- The task force on the workability of AfA will make suggestions

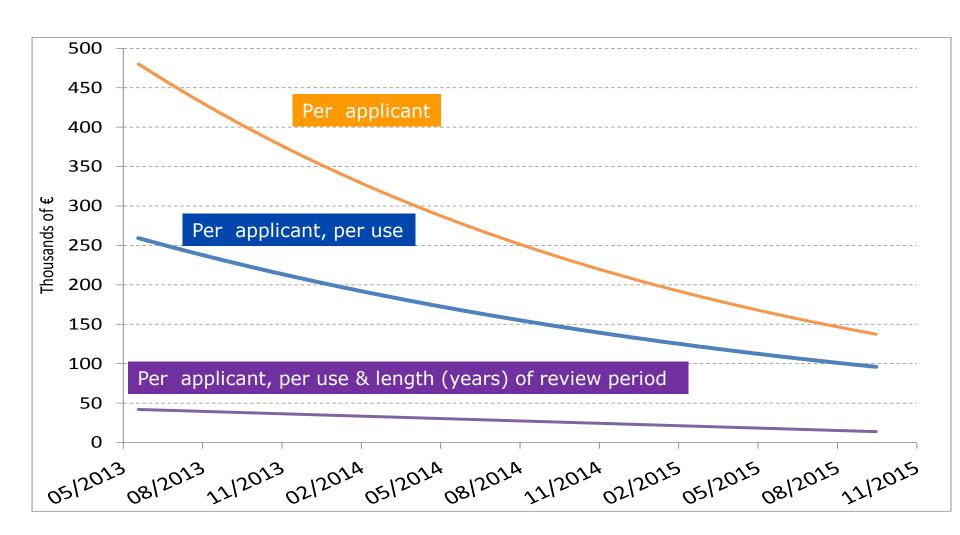


Application effort and costs per applicant, per use and per length of review period...





... have about halved in 2 years





ECHA's actions

- Seminars/workshops
- Guidance, clarification notes, reference DNELs/Dose-Response Relationships
- Continued to hold Pre-Submission Information Sessions (PSIS)
- Made available examples of Analysis of Alternatives and Socio-Economic Analysis





Task force on workability of applications

- 2 special cases:
 - Low volumes: Commission preparing an implementing act
 - Legacy spare parts: the Commission plans to propose an extension of the latest application and sunset dates
- Addressed other issues
 - Discussions with automotive, aviation and process chemicals industries
 - Essential nutrients
- Meeting on 18 November, 2015



2. Key principles

- Application effort should (always) be "fit for purpose"
- Appropriate scrutiny of the applications
 - Have high competence in ECHA including its Committees
 - Have clear, well justified and consistent opinions that the Commission can use without delay
- Trust of all
 - Transparency and overall scrutiny of stakeholders



3. Upstream applications

- Essential to keep the system manageable
- Main challenge: collect and present information from possibly very complex – supply chains
- The use descriptions and their scope have usually been (very) broad
- Typical or representative sites/exposure scenarios could be a way out
 - Comprehensive description of the OCs/RMMs backed by measured data
 - These are the conditions that the DUs need to adhere to



Limited knowledge of supply chain

Application

Substitution

Authorisation Downstream notifications and increased communication in supply chain

Review

1

Increased incentive to apply for more specific uses while substituting and reducing the risks

Upstream applications:

Substitution

Authorisation

Review

Authorisation Even more specific uses with more accurate description, substitution



4. Take home

- The process works and has had visible positive impacts
- Application effort and costs have halved
- We need to improve in particular for "upstream" applications
 - Hope that this workshop will give ideas on how to do this
- Task Force will work on this, too



Thank you

Subscribe to our news at echa.europa.eu/subscribe

Follow us on Twitter @EU_ECHA

Follow us on Facebook Facebook.com/EUECHA

