Socio-Economic Analysis in REACH

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"Challenges in applying SEA to assess applications for authorisation and restrictions, how would the system function without SEA?"



Challenges in SEA

- Change from a keyhole perspective to the bigger picture
- Include a wider perspective on costs and benefits in the socioeconomic analysis
- Do not disfavour users and producers of alternatives



"Challenges in applying SEA to assess applications for authorisation and restrictions, **how would the system function without SEA?**"



REACH §55 Aim of authorisation and considerations for substitution

The aim of this Title is to ensure the good functioning of the internal market while assuring that the risks from substances of very high concern are properly controlled and that these substances are progressively replaced by suitable alternative substances or technologies where these are economically and risks, and the technical and economic feasibility of substitution.

technically viable. To this end all manufacturers, importers and downstream users applying for authorisations shall analyse the availability of alternatives and consider their



Too much emphasis on SEA

- Anyone providing a "good business case" should not be granted authorisation
- If a suitable substitute exists in the SEA route no authorisation can be given, regardless of how high the socio-economic benefits are (§ 60.4)
- Given this- SEA gets too much focus in the process



Assessment of alternatives

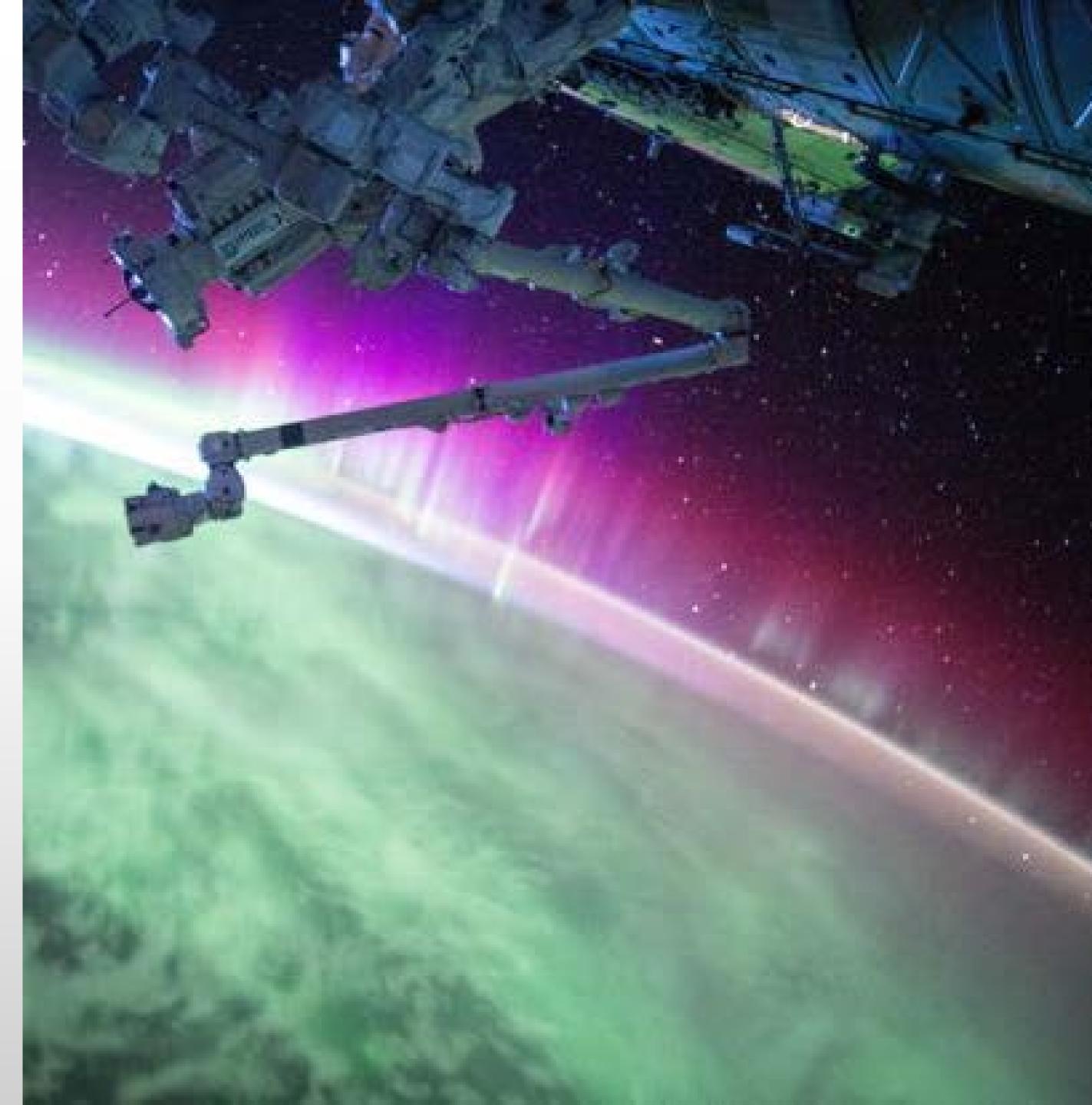
- Assessment of alternatives is key for REACH to fulfill its aims
- Assessment need to include:
 - Applicants perspective
 - o Third parties perspective
 - o Other information
- Burden of proof is on the applicantnot on the the alternative providers





Summary - see the bigger picture

- SEA is taking attention from the more important question of available alternatives
- No authorisation should be given when alternatives are available.
- A SEA should include the perspective of the applicant AND of alternative providers, society, environment and human health
 - the bigger picture



Thank you!

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