

Closing remarks

Seminar on applications for authorisation
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Applicants need to make strategic choices

- Applying for an authorisation is a core business decision. Ask yourself first what you would do if the Annex XIV substance can no longer be used in the EU
- Applicants need to decide on their strategy to develop and submit applications for authorisation. This is likely to be done on a case-by-case basis. In particular, applicants need to consider thoroughly and well in advance:
 - which uses to apply for,
 - what route(s) for authorisation they envisage,
 - whether or not to collaborate when developing their application, and
 - whether or not to apply jointly
- A strong case probably means an easier application: the substance clearly adds value and the remaining risks are small

Good communication within and outside your supply chain is crucial: up, down and side!

- Extensive communication in and between supply chains is crucial for preparing a well-defined application
- Similar actors outside your supply chain could provide important information and there might be an interest in working jointly on some aspects

Start early

- Some parts of the applications will probably require quite some time to develop, especially:
 - Analysis of Alternatives,
 - Socio-economic Analysis

Build on existing knowledge

- Applicants should, however, build on existing information. They may have collected this in the past

Do not overcomplicate your application

- E.g. in SEA: the role of monetisation of impacts is probably overplayed, you need to be able to show that 'costs would be high' and 'risks are low'. You can use contextual information and comparisons

Share experiences

- Sharing (even preliminary) experiences would also be very beneficial for those who are totally new in the authorisation process

Consider what is really confidential in the application

- Thoroughly consider what critical information should not be disclosed by ECHA
- Can you make your case without using confidential data?
- Transparency is very important for third parties
- The less information is claimed confidential the easier the application is handled by ECHA Secretariat and Committees
- Access To Document requests are very likely for untransparent applications
- All confidentiality claims should be solidly justified

Follow-up

- Notification of possible applications to ECHA and requests for PSIS is encouraged
- Additional information available through
 - ECHA's webpages including the Q&As,
 - National helpdesks,
 - ECHA helpdesk
 - Industry associations
- Use the AfA Partners' service to find collaborators

Thank you!

