



Information gathering from downstream users in the supply chain to prepare for authorisation

Julius Waller

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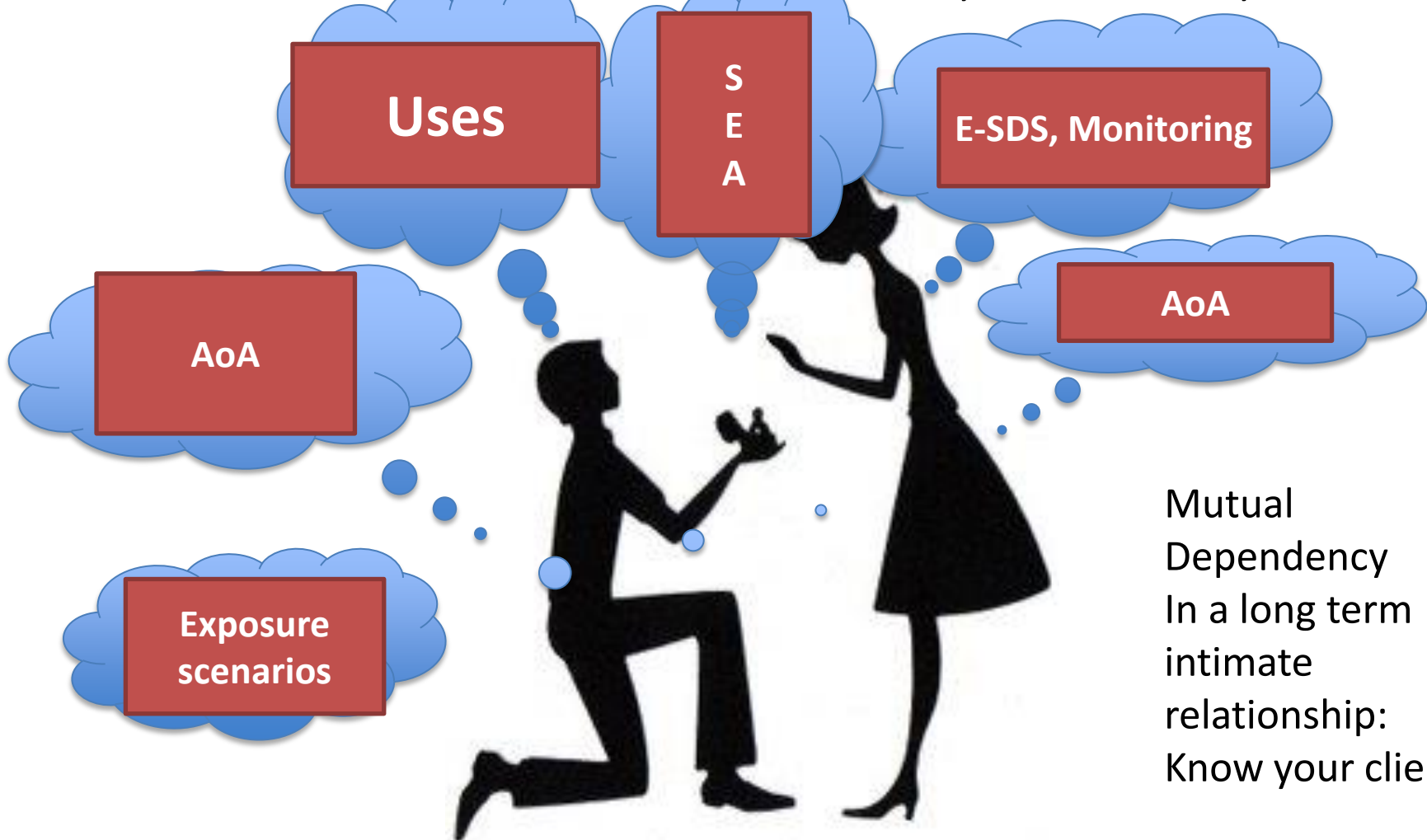
8th meeting of the exchange network on exposure scenarios



Questioning the downstream supply chain

- Summary of experience
- Where to start, what to ask?
- Challenges
 1. Sample size - choosing who to question
 2. Unforeseen barriers
 3. Your registration dossier
- Making the process worth it
- Conclusions

Authorisation is like... Marriage... Don't get into it if you don't what you are in for



Mutual
Dependency
In a long term
intimate
relationship:
Know your client

Where to start?

- Make an outline of your dossier - guide to questions
- Explain why you need their help
- Plan to go on site
 - a. At least in one place for every use (preferably 2 or 3)
 - b. Ask permission to see production
 - c. Ask permission to take pictures
 - d. Ask for technical, sales and production experts to be present as well as a seniorish manager
 - e. Plan a half day per site/downstream user
- Do a trial run at a *'friendly'* downstream user
 - 1) gathering general information on the relevant markets
 - 2) drafting questions before the visits.
- Refine your questions

What to ask?

Uses:

- Authorisation is from the perspective of the applicant (or DU)
- Understand DU position in the value chain

CSR/Exposure scenarios

- Seeing is believing - look at every step in reality
- Ask to obtain any studies, measurements, bio monitoring etc..
If necessary with help of Trade-Unions
- Look and ask questions as if you performed an Occupational Hygiene or Environmental assessment
- Check compliance with e.g. carcinogen, CAD etc..
- Workforce breakdown etc...

Some examples of what you might ask more...

Socio-economic analysis:

- Basic financials of the company including R&D
- How much does the '*to be authorised use*' account for?
- Cost break down of final product including the use, % cost of the '*to be authorised*' substance
- Price elasticity data

Analysis of Alternatives:

- Ask about substitution efforts
- Let them explain in their own words why they want to continue using the substance

Try to listen more than talk

Challenges

Sample size

- See at least one representative DU in each use, company size and geographical area
- Resort to written questionnaires after physical visits

Unforeseen barriers

- Wholesalers:
 1. Some will question your motives in part due to lack of awareness
 2. *'Chinese whispers'*
- Relationships are not necessarily good with all DU
- Business confidentiality
- Available monitoring data and work practices will differ widely
- Use of PPE and risk mitigation measures will be different
- Tolling manufacturers - new insights into alternatives or economics

It's the registration dossier...

Registration dossier and authorisation application must be in harmony

- Exposure scenarios in registration are too general
- Too many assumptions are the bane of a good SEA - they all need to be justified
- Dustiness, solubility need substantiation
- Not enough detail

If you are in a consortium - you will need to opt out

The logo for EPPA, consisting of the lowercase letters 'eppa' in a bold, blue, sans-serif font. The 'e' is stylized with a white dot.

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T +32 2 735 82 30

F +32 2 735 44 12

brussels@eppa.com

Place du Luxembourg | Luxemburgplein 2

1050 Brussels

Belgium

