Public Consultations on applications for authorisation

a perspective from the applicant

Alternatives and applications for authorisation

Remember:

Applications are made from the perspective of the applicant

Keep in mind:

- ❑ Technical function
- ❑ Constraints of the applicant
- ❑ Consultation is about alternatives. Of all responses
    1. 30% are about something else
    2. 30% are platitudes – (*I can do without it, I agree with the applicant, this is a bad substance*)
    3. 30% overlook critical technical functions
- ❑ Avoid bad for bad (like in TCE case)

READ THE Analysis of Alternatives

Two different scenarios

Producer application

(e.g. DCC, Olin)

- respond if you can add something concrete
- show the alternative works in the methodology of the applicant OR show why the applicant's methodology is wrong
- do not extrapolate a single use to a generally applicable alternative

Downstream user application

(e.g. Rolls Royce, Linxens, Yara, Roquette)

- be very specific (same as the applications)
- suggest technology solutions
- offer realistic solutions
- take into account your client base, manufacturing site, product etc... May not be the same as the applicant's

Experience

- Quality of responses to public consultation has been – unfortunately – poor
- Participation in the trialogue helps ECHA's SEAC
  - the system is adverserial
  - Good debate means consensus over outcome
- see it as a marketing opportunity
  - Your technology process
  - Your alternative substance
- if you don't speak up – dont cry afterwards you weren't heard

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