
TEMPLATE
for third party submission of information on alternatives for
Applications for Authorisation

NON-CONFIDENTIAL

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7. OTHER COMMENTS

Producers of alternatives have in previous opinions on AfA been disregarded by the ECHA Committees as not providing relevant information or too little information. This has been interpreted by ECHA as the alternative is not suitable or available and therefore the opinion has been to grant authorisation in cases where alternatives are in fact available. This is against the intention of REACH and we hope this is a lessons learned. We therefore stress the importance of inviting alternative providers to the public consultation and the dialogue as well as have close contact with these companies throughout the process.

The socioeconomic aspects to be considered in this case must include society costs for continuous use of SVHCs as well as market implications for producers of alternatives if continuous use of SVHCs is granted. In order to get a complete picture of the economic impact, it is necessary to look beyond the costs of the applicant alone. Economic effect on alternative producers and users need to be accounted for as well. Company investments in the production or implementation of alternatives would lead to diminish profits if authorisation of the very same SVHC were to be granted. Anticipated sales will not materialise and, with a non-growing demand for the alternative, prices will not be lowered either.

The fact that if the applicant will loose market if authorisation is not granted means that an alternative producer most likely would gain market share, needs to be taken into consideration.

Moreover, if the committees become aware of suitable alternatives for some uses, they should narrow down the application to only cover uses where in fact there are no alternatives.

REFERENCES

APPENDIXES

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