

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

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
 - Third parties perspective
 - Other information
- Burden of proof is on the applicant- not on the the alternative providers



Summary

- see the bigger picture

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- 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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