

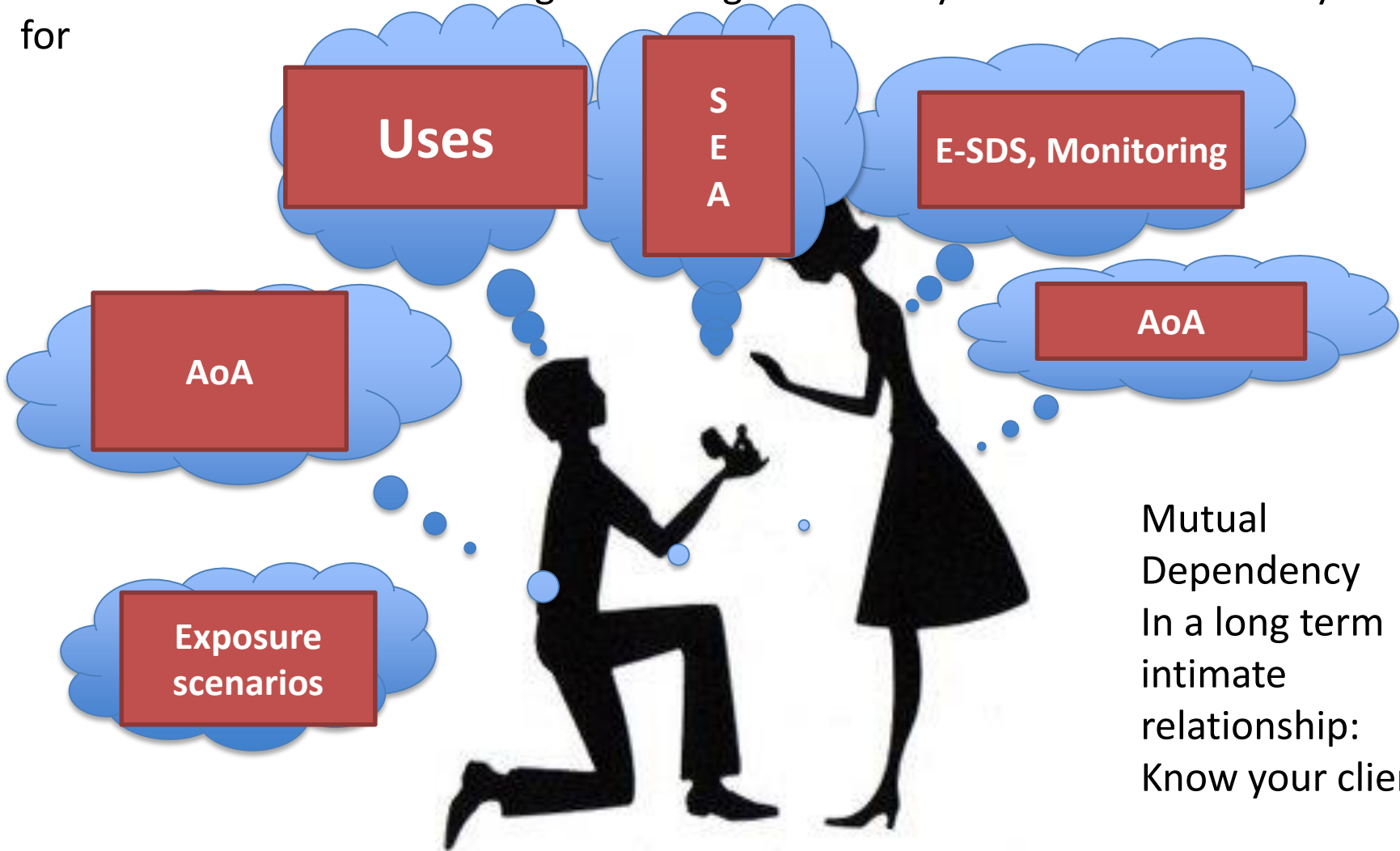


# Upstream applications, lessons learned gathering the socio-economic data for the upstream applicant

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



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

# Summary

- Summary of experience
- AoA
  - ✓ How to obtain information
  - ✓ Different DU = different (lack of) alternatives
    - **Barriers**
- SEA
  - ✓ Non-use scenario
  - ✓ Estimating costs/benefits
    - **Barriers**
- Making the process worth it
- Conclusions

# Analysis of alternatives

## ➤ Downstream user as a resource

- Using an SVHC is a problem for any company, if they do it they must know WHY they do it;
- Use definition is critical to obtaining correct input from DU;
- DU can provide technical proof of (lack of) Alternatives
- If # DU > 10 - you must sample correctly;
- Dynamic relationship between Producer and DU-chain:
  - Producer sells a substance with certain characteristics and attributes - envisions hypothetical use;
  - DU - actually know what happens when the substance is used and when alternatives are employed instead

➤ Challenge is to integrate the anecdotal into a technical and economically valid conclusion

# Socio-Economic Analysis

- A deep understanding of the market/s where downstream users use the substance is the key for the SEA:
  - The SEA should be based on a macro-approach which is able to cover all the markets concerned by the uses applied for
  - Consultation with representative samples of downstream users is indispensable for deducing the likely responses of all the downstream users
  - The consultation is a long, complex and iterative process
  - Consultation requires continuing dialogue with downstream users who need to understand the logic of the SEA in order to provide meaningful inputs
  - Publicly available database (like Eurostat, Globocan, etc.) can be very useful for better understanding the markets and magnitude of certain impacts
  - Costs and benefits in the non-use scenario can never be assessed with precision, so the analysis of sources of uncertainties is a must.

# Barriers

## ➤ Legal - commercial

- ✓ Business secrets
- ✓ Relations with competing suppliers (of alternatives)
- ✓ Wholesalers - distributors

## ➤ Practical

- ✓ Downstream supply chain is very long - final customer is invisible to producer
- ✓ Downstream final user is 'unsettled' by authorisation process
- ✓ Downstream users struggle to understand the logic of the SEA (and this can make the consultation process a very time and energy consuming exercise)

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.

25 YEARS

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