

## Alternatives and substitution

• Use desciption is considered often to be too broad:

What could be done so that the uses are described in a meaningful manner?

- What should applicants and alternative providers do? When?
- What should regulators do (to support this)?
- Would a "negative list" (of "sub-uses" not covered, be helpful?)

- To what extent is it possible to know all uses in advance?
- Concerns are voiced that the AfA process favours applicants to the detriment of alternative providers. How can this be addressed?



## How can the authorisation process be more cost-effective?

**Costs** of applications have decreased over the years, as more experience has been gained.

- How could the costs of applying be reduced?
- Anything that ECHA/Commission could do?

## **Predictability**

- How useful is the current guidance and support from ECHA for preparing robust applications and third party contributions?
- What is missing?



• How can the supply chain communication be further improved, both downstream (to inform and involve DUs) and upstream (to prepare robust upstream applications)?



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