

STUDY ON THE IMPACTS OF AUTHORISATION

WHAT DID WE LEARN IN ORDER TO IMPROVE THE STUDY IN 5 YEARS TIME?

Stock-taking conference on the
implementation of REACH authorisation

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Apeiron
where Strategy, Science and Efficiency meet

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 The Economics Interface

OUTLINE

1

What did we learn?

2

Which uncertainties might be resolved in 5 years time?

3

How important are these data gaps and what can be done?

WHAT DID WE LEARN? - DATA SOURCES

1 Existing studies

2 Pre-survey engagement

3 Online surveys with NGOs and industry

4 Questionnaires to public authorities

5 Interviews

6 Market reports and statistics

WHAT DID WE LEARN? - DATA SOURCES

- **Existing studies** - Mostly qualitative information
 - Not that many studies specific on REACH Authorisation
 - Some of the more recent authorisation studies were being carried in parallel - difficult to incorporate their findings in a timely manner
 - But it did provide a base for comparing our findings with
- **Pre-consultation (emails and calls)** to raise awareness of the upcoming survey
 - Successful but very time consuming
 - Only a few NGOs have data on REACH authorisation
 - Lots of companies/sector groups were happy to speak but not many had necessary detailed data or were able/willing to share
- **Online survey**
 - Proved to be the approach that was able to provide get the most quantitative and monetary data
 - Was a very long survey - But in hindsight it should have been longer
 - It was very time consuming - Should have been a separate study done in advance
 - NGO survey - given small sample - would have been better to do a questionnaire

WHAT DID WE LEARN? - DATA SOURCES

- **Questionnaires with public authorities**
 - Successful as they are familiar with filling in questionnaires
- **Interviews**
 - Useful to provide further context/info to survey results
 - Useful for producing case studies
 - Did not reveal significantly more quantitative and monetary data
 - Time consuming and difficult to arrange over summer period
- **Market reports and statistics**
 - Public statistics not always substance specific (e.g. groups of substances)
 - Market reports and statistics are not specific to uses subject to authorisation
 - For substance specific case studies reports can be useful but not when trying to get a bigger picture on all SVHCs

WHAT DID WE LEARN - EASIER TO GET DATA AT SUBSTANCE LEVEL

1 EU LEVEL



- x - Publicly available statistics
- x - Market reports
- x - Interviews
- x/✓ - Online survey (dependent on sample size)
- x - Existing studies

2 SUBSTANCE (SVHC) LEVEL



- x - Publicly available statistics
- ✓ - Market reports
- ✓ - Interviews / questionnaires
- ✓ - Online survey
- ✓ - Existing studies

3 SPECIFIC USE OF AN SVHC



- x - Publicly available statistics
- x - Market reports
- ✓ - Interviews / questionnaires
- ✓ - Online survey
- ✓ - Existing studies

LEVEL OF QUANTIFICATION POSSIBLE

1 EU market changes

2 Substitution

3 Costs

4 Benefits

5 Impacts on SMEs

WHAT UNCERTAINTIES MIGHT BE RESOLVED IN 5 YEARS TIME

1 If some applicants were able to substitute or if they submit review reports

2 Benefits of substitution (currently it is too early to say at the moment)

3 Changes in exposure and emissions from continued uses of SVHCs (e.g. review reports)

4 Any evidence of closure and relocation of production within the EU

5 Costs and benefits of enforcements of REACH authorisation

6 Comparison with findings from this study (i.e. some form of baseline has been established)

PRIORITISES FOR DATA GAPS

1

Changes in exposure of SVHCs

2

Changes in emissions of SVHCs

3

Benefits of substitution
(A good or regrettable substitution?)

4

Evidence of closure and relocation and of diverted investment to non-EU sites

5

Competitiveness of EU companies

6

Comparison of the regulatory situation in other non-EU countries

ONE IDEA - A POST SUNSET DATE REPORT?

1 Report at substance level

2 Relevant for substances with lots of AfA's and/or high volumes being used

3 Applicants and alternative providers would have an incentive to input to it

4 Opportunity for NGOs to comment at substance level rather than per AfA

5 Information could also help applicants with their review reports / substitution efforts

6 May reduce concerns of granting longer review periods if EC get regular updates on the need for authorisation

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