Template for

**ANALYSIS OF ALTERNATIVES**

**to biocidal active substances meeting the substitution criteria under the Biocidal Products Regulation**

**Version 1.1**

**February 2023**

|  |  |
| --- | --- |
| Version | Changes |
| 1.0 | First version |
| 1.1 | Formatting issues fixed (headings, table of contents) |

**Preamble**

An analysis of alternatives (AoA) should be performed for active substances being candidate for substitution (CfS) according to Article 10 of the Biocidal Products Regulation (BPR, Regulation (EU) 528/2012). ECHA’s guidance on analysis of alternatives to biocidal active substances for applicants and MSCAs provides a set of elements considered important to evaluate the availability of suitable alternatives to CfS. The present template provides a structure for reporting this analysis.

**Instructions: public and confidential versions of the analysis of alternatives**

With the consent of the author of the AoA, ECHA will publish on its website the “public version” as a part of the information provided for the stakeholder consultation made according to Article 10(3) of the BPR. It is important that the public version of the analysis of alternatives has minimum redacted (blanked out) confidential information, if any. Confidential information can instead be reported in a slightly more generic, non-confidential manner e.g. by using non-confidential ranges for figures.

Any confidentiality claim should be duly justified. In case the author of the document wishes to provide confidential information to the eCA and BPC, then they must prepare two versions of the same AoA document: one containing confidential business information (clearly marked as such) and another “public version” which should blank out (redact) confidential business information. Please be aware that the confidential version of the AoA is still subject to access to documents requests under different pieces of legislation (see legal note below).

Always include justifications for each item that you have claimed as confidential in the “public version” of the AoA. Give a clear numbered reference to each piece of information claimed confidential. Redacted items should be limited to a minimum and cover only that information for which disclosure presents a direct threat to commercial interests. The size of redacted text/figure should correspond to the actual size of the text/figure which has been redacted (e.g., if an entire page has been redacted, it should be visible in the “public version” that an entire page has been blanked out).

If the redacted text concerns qualitative information, make sure that the public version still contains enough information to constitute a meaningful non-confidential summary. Use non-confidential ranges to replace exact confidential figures. If the text left visible after redaction would not be understandable to the reader without the confidential information, include a non-confidential description/summary of what has been redacted next to the redacted area [in square brackets].

The confidential AoA should be made available to the eCA as an unprotected Word (or rtf) file. As regards the public version, ensure that the redacted parts cannot be removed or the underlying text revealed by technical means.

The two versions of the format need to be identical apart from the parts containing confidential business information that are redacted in the public version. In the confidential version, confidential information should be readable and marked in red or highlighted in yellow. In the public version each redacted part should be clearly referenced with a number and this reference should be made visible. This is to allow an unambiguous link with the justifications for why the information should not be made publicly available. These justifications need to be provided in an annex to the confidential version of the AoA. Further instructions on the redaction and justifications for confidentiality are provided in the Legal Note and in the AoA template. The same approach should be taken for all documents provided as annexes (except for the annex with the justifications for confidentiality).

**Legal Note**

With the consent of the author of the AoA, ECHA will publish on its website the public version as a part of the information provided for the stakeholder consultation made according to Article 10(3) of the BPR. It is the applicants’ responsibility to ensure that no confidential business information is present in this document. ECHA does not assume any liability for damages resulting from the publishing of confidential information that you may have included in the public version.

Please note that the confidential version of the analysis of alternatives is subject to Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents and Regulation (EC) No 1367/2006 regarding the application of the provisions of the Aarhus Convention on Access to Information, Public Participation in Decision-making, and Access to Justice in Environmental Matters to Community institutions and bodies.

The justifications and motivations for not disclosing specific information in the public version will play a crucial role in ECHA’s assessment of what information should be disclosed following an access to documents request under the aforementioned Regulations. This holds without prejudice to ECHA’s final decision on the disclosure of the requested document in accordance with the aforementioned regulations.

**Instructions for how to provide a justification for confidentiality**

Any information submitted to ECHA is subject to Regulation 1367/2006 on the application of the provisions of the Aarhus Convention on Access to Information and to Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents. Therefore, applicants or MSCAs submitting analysis of alternatives are asked to provide a justification for confidentiality for each comment or attachment submitted to ECHA and Member State Competent Authorities. If the submitter’s justification is sufficient and falls under one of the exceptions envisaged in Regulation 1049/2001, there will in principle be no need to request further clarification from the submitter why a request for access to part or all information marked confidential in the submission should be denied. The submitter’s justification for confidentiality should contain the following three elements:

• Demonstration of Commercial Interest

Description of the nature of the third-party commercial interest and demonstration that this commercial interest is worthy of protection by the non-disclosure of information.

Demonstration of any specific measures the submitter has taken to keep the information claimed confidential secret to date.

• Demonstration of Potential Harm

Explanation of why release of the information claimed confidential would be likely to cause potential harm to the commercial interest and the specific nature of those harmful effects. A causal link between disclosure and such harmful effects should be clearly explained.

• Limitation to Validity of Claim

The period of time for which the claim will be valid: until a certain date, until the occurrence of a particular event (which should be clearly specified), or indefinitely.

See also the ECHA Guidelines for assessing the confidentiality of the information contained in the Competent Assessment Report (CAR) and Product Assessment Report (PAR): <https://echa.europa.eu/documents/10162/992289/guidelines_assess_bpr_conf_claims_en.pdf/3c579364-5a0b-b098-06bf-3323f5b8a496?t=1632295766830>

Template for

ANALYSIS OF ALTERNATIVES

to biocidal active substances meeting the substitution criteria under the Biocidal Products Regulation

**Legal name of submitter:** [Legal names of submitter]

**Date:** [Date when the document was completed, normally the date of submission]

**Substance candidate**

**for substitution:**  [Include active substance name, EC and CAS number]

[To update the table of contents (TOC), click into the table, “Update table of contents” and “Update entire table”]

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**List of abbreviations**

[Please insert here manually the list of abbreviations]

Declaration

The applicant is aware of the fact that evidence might be requested by ECHA or the relevant Member State Competent Authority to support information provided in this document.

Also, we request that the information redacted in the public version of the analysis of alternatives is not disclosed. We hereby declare that, to the best of our knowledge as of today ([DATE]) the information is not publicly available, and in accordance with the due measures of protection that we have implemented, a member of the public should not be able to obtain access to this information without our consent or that of the third party whose commercial interests are at stake.

Signature: Date, Place:

[NAME, TITLE]

SUMMARY

[Summarise (max. 2 pages) the main elements and conclusions of the analysis of alternatives:

* A summary of the intended uses, the function of the substance, types of biocidal products, end-uses, markets, etc.;
* The steps taken to identify possible alternatives to the substance function (incl. R&D efforts, providers of alternatives, data and literature searches, etc.);
* Identification of potential alternatives and the availability and suitability of these alternatives for the substance function for the intended uses;
* If alternatives do not exist or are considered not to be suitable for the intended uses, a summary justifying these conclusions;
* To the extent possible, if alternatives were identified as currently not suitable for the use applied for, the key actions needed to make immature alternatives suitable and available, the timescale for these actions, and the conditions under which substitution could become feasible both from a technical and economic perspective;]

SCOPE OF THE ASSESSMENT AND OVERVIEW OF THE APPROACH

(See Guidance section 3.1)

[Summarise the scope, boundaries and overall approach you adopted to analyse the alternatives. This relates to the geographical scope, intended uses covered, types of alternatives, types of biocidal products and end-products, hazard, other sustainability endpoints and assessment criteria considered, life-cycle considerations, methodologies applied, level of stakeholders’ engagement, etc.]

ANALYSIS OF THE SUBSTANCE FUNCTION(S), TYPES OF USES, TECHNICAL REQUIREMENTS AND MARKETS FOR THE PRODUCTS

CfS active substance identification and properties

(See Guidance section 3.2.1)

[Present the CFS substance identity for which the analysis of alternatives is performed. Summarise the most relevant substance identifiers, physical properties, hazard classifications and hazard concerns, Product Types and the list of intended uses.]

Description of the function provided by the CfS active substance

(See Guidance section 3.2.2)

[Present a description of the function provided by the CfS active substance, including:

* what the active substance is doing (task) and how (mode of action);
* a summary of its efficacy towards the target organism(s)[[1]](#footnote-2);
* other useful functions than the biocidal action that the active substance might have;
* the necessary conditions under which the function(s) is(are) performed
* are there features of the treated articles/end-product that determine the requirement for use of the substance? Would using a different article or a different material for the article eliminate the need for the active substance?[[2]](#footnote-3)
* is there a real need for the functionality delivered by the substance?

If the above information varies among the different intended uses, it should be described per indented use. The methodology, data sources (preferably obtained from trusted, independent sources), assumptions made, uncertainties should be presented and justified.]

Intended uses and products

(See Guidance section 3.2.3)

[Describe the intended uses and related products:

* Overview
  + Overview of the intended uses of the active substance, the types of biocidal products[[3]](#footnote-4) in which it is used and the related treated articles/end-products[[4]](#footnote-5)
* Markets and supply chains[[5]](#footnote-6)
  + the market sectors for these biocidal products and treated articles/end-products (e.g. professional, general public),
  + countries/regions where the biocidal products, treated articles/end-products are commercialised,
  + volumes involved (active substance, biocidal products, treated articles/end-products) and the economic value,
  + which are the main producers and users,
  + market trends
* Application methods and rates, risk mitigation measures for each intended use (how is the active substance used in the biocidal products, treated articles/end-products)
* Combinations with other active substances, if relevant

In addition to the information above, for a given product type (PT), the core identification elements of an intended use can be summarised in a table such as below:

|  |  |  |
| --- | --- | --- |
| 1 | Product Type | e.g. PT 19 |
| 2 | Where relevant, an exact description of the authorised use | e.g. Repellent |
| 3 | Target organism(s) (including development stage) | e.g. Mosquito (adult) |
| 4 | Field of use | e.g. indoor use |
| 5 | Category(ies) of users | e.g. General public |
| 6 | Application method(s) | e.g. Spraying |

]

Description of the technical requirements that must be achieved by the product(s)

(See Guidance section 3.2.4)

[Provide a detailed description of the technical requirements that serve as a basis for assessing the technical feasibility of the alternatives. (e.g. efficacy towards the target organism, usability in a certain temperature range, compatibility with a certain material), including tolerances of these requirements (i.e. an acceptable range) for the product(s) concerned.

If applicable, the additional requirement such as the ones below should be listed:

* Regulatory or legal requirements for technical acceptability (e.g., maximal regulatory limits or regulatory approval by national authorities);
* Internationally recognised standards for technical performance (e.g., EN or ISO standards);
* Certification requirements;

If several industrial/market sectors are concerned and if they have different technical requirements, the discussion should reflect this variety.]

ANNUAL TONNAGE

[Indicate the average annual tonnage used for the use applied for. Please consider any future variation of quantities used. If you can justify why the tonnage should be confidential, indicate besides this confidential tonnage figure a tonnage band. In the public version of the AoA the confidential tonnage figure can be redacted, just leaving the tonnage band visible to the public. If you indicate bands, you may use at a minimum the standard ones below[[6]](#footnote-7):

<1 tonne per year

1-10 tonnes per year

10-100 tonnes per year

100-1000 tonnes per year

>1000 tonnes per year

However, to provide as meaningful information as possible please use as precise bands as possible, for instance:

If the actual (confidential) annual tonnage for use is 25 tonnes per year, you may use in the public version as a tonnage band of 20-30 tonnes per year.]

IDENTIFICATION OF POTENTIAL ALTERNATIVES

(See Guidance section 3.3)

Description of efforts made to identify possible alternatives

Stakeholders’ involvement

[Document the stakeholders’ involvements undertaken during the analysis. Include when you consulted third parties, their names and company contact details (including e-mail addresses) but do not provide names of persons. In particular provide the details of:

* Companies providing the alternative substances, technology or service;

As relevant, provide details of how you have consulted the supply chain(s), in particular your clients and downstream users. Provide information about the surveys you have done with your customers or other stakeholders about the availability of similar products made without the CfS substance or other alternatives. Please also provide details of other organisations contacted. Report any information about companies that possibly have already substituted. Provide a summary in this section and use Appendix 1 for details.

The details of these consultations should be documented in the relevant sections of the analysis of alternatives.

* When you consulted third parties, include company names and contact details (including functional mailbox e-mail addresses) but do not provide names of persons.
* Provide as much details as possible about companies that provide alternative substances, technologies, or services to meet the function of the active biocidal substance for which an alternative is sought;
* As relevant, provide details of how you have consulted (parts of) the supply chain(s), in particular the customers and/or downstream users and any other organisations contacted;
* Provide information about any surveys you have done with the customers and other actors regarding the availability of alternatives;
* Describe how you assessed the users’ acceptance of alternatives that you have been investigating (e.g., by running customers’ surveys, performing market analysis, or indicating the relevant sectoral technical standards, pre-agreed performance criteria, etc.).
* Please also provide details of other organisations such as trade associations, consumer interest groups etc. that you have contacted.
* Report the information collected in the relevant sections of the analysis of alternatives.

]

Research and development

[Include information on past and/or planned research and development activities undertaken by the applicant, suppliers of biocidal substances or products, suppliers of alternatives, downstream users, regulators, universities, research institutes and others.

Provide high-level non-confidential information on past, current and/or planned R&D activities undertaken to identify potential alternatives. These activities can be undertaken by the applicant, suppliers of biocidal substances or products, suppliers of alternatives, downstream users, regulators, universities, research institutes and others by using in-house information, publicly available information and/or by communicating within and outside the supply chain.]

Data searches

[Describe the timing, extent and results of data searches on possible alternatives.

Such information can come from:

* Scientific literature, academic/trade journals
* Publicly available tools and databases
* EU and non-EU programmes on chemical safety
* Patents databases
* Other sources

]

Identification of alternatives

(See Guidance section 3.3.2)

Screened alternatives and selection for further assessment

[List all possible alternatives substances and non-chemical alternatives that have been identified for the intended uses of the CfS active substance. A list of the criteria that served for this first selection of potential alternatives should be presented.

Describe and justify in detail the key criteria used to select a sub-set of potential alternatives for a more in-depth analysis (shortlisted alternatives).

In addition to the detailed description and justification of the criteria used, summarise the information, including the reasons why the alternatives have been selected or rejected should be clearly stated, in two tables as presented below:]

Table : Initial list of chemical and non-chemical alternatives and outcome of the selection for further assessment

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Intended use number | Alternative number | Name of the alternative | CAS or EC Number (where applicable) | Description of the alternative | Reason for selection/rejection for further assessment |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Table : Shortlisted chemical and non-chemical alternatives for further assessment

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Intended use number | Alternative number | Name of the alternative | CAS or EC Number (where applicable) | Description of alternative |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

[Add any figure, if relevant]

Figure

SUITABILITY AND AVAILABILITY OF POTENTIAL ALTERNATIVES

(See Guidance section 3.4)

[Organise the analysis of suitability and availability of alternatives by intended use and potential alternative, distinguishing alternative substances from non-chemical alternatives. Use the same use categorization as presented in section “3.3. Intended uses and products”.

For each alternative, under the different assessment modules (technical/economic feasibility, reduction of risk, availability) make clear to which Product Type, intended use, types of biocidal product and end-product/application the assessment relates to.]

INTENTED USE 1

Chemical alternatives

#### Alternative substance 1

Substance ID and properties (or Description of alternative technique)

[Indicate a description of the alternative active substance in a similar manner as done for the CfS (i.e., chemical name, IUPAC name, CAS/EINECS number, or other identifiers), a summary table of properties relevant for the overall risk to human health and the environment (e.g., physico-chemical properties, classification and labelling information, etc.).]

Reduction of overall risk

[Present an assessment of whether the substitution to the alternative would result in reduced overall risks to human health, animal health and the environment. In the risk assessment of the alternative, consider all the relevant risks and effects associated with the alternative. These may also be related to other aspects affecting the overall risk reduction capacity of the substitution to the alternative, such as changes in energy or raw material consumption or physical conditions.

Describe the methodology of comparing the risks of the CfS substance and the alternative. Document the data used, its quality and reliability, the assumptions made, the uncertainties in the analysis and their impact on the conclusions of the assessment.]

Conclusion on the reduction of overall risk of using the alternative

[Provide your conclusion and justifications whether using the alternative present a significant lower overall risk for human health, animal health and for the environment or not. This means if the alternative has a significantly better profile for the human or animal health or for the environment (depending on the main concern(s) of the CfS) and not significantly worse for any of those three aspects.]

Technical feasibility

[Based on the outcome of the stakeholders’ involvement, literature searches, data collected and the technical requirements specified, a transparent assessment of the technical feasibility of the alternative should be presented. It should be shown how the criteria for equivalent function were applied to the potential alternative to determine its technical feasibility (including efficacy) and how the information gathered from the stakeholders’ involvement was integrated in the assessment. The methodology, data sources (preferably obtained from trusted, independent sources), assumptions made, uncertainties and their effects on the conclusions on the technical feasibility of the possible alternative should be described.

The possible process or method changes required for a substitution to the alternative substance or non-chemical alternative and how these affect the technical feasibility of the alternative should be described. The following changes (positive, negative or neutral) affecting the technical feasibility of substitution should be identified in the present assessment :

(a) Any adaptations or changes in the technology, process, procedure or device, modification of end product or other solutions necessary to replace the relevant product (e.g. the requirement for new/additional equipment, risk mitigation measures, energy, personnel changes and training needs, raw materials, waste, etc.).

(b) Any other changes in terms of compliance with legislation on worker safety, relation with community, etc.

(c) Any change in time for effect or higher amounts of alternative BPs needed to achieve the control of the target organism[[7]](#footnote-8).

In addition, to the extent possible, information and discussion on the potential effect of the substitution on the resistance of the target organisms should be inserted.

The technical feasibility assessment of an alternative should include the qualification of the changes whether these constitute significant disadvantages or not.]

Conclusion on the technical feasibility of the alternative

[Based on the above, a conclusion on the technical feasibility of the alternatives for the intended uses should be drawn.

It should be clarified if the alternative can be considered technically feasible for sub-sets of the intended use or specific markets but not for others.

If it is concluded that the alternative is not technically feasible for the intended use or a sub-set of the intended use, possible actions (including R&D, production trials, etc.) from the applicant or other actors and timeframe within which technical feasibility could be achieved should be described if known, including obstacles or difficulties expected.]

Economic feasibility

[Report qualitatively or quantitatively the direct and/or indirect costs associated with the transitioning to the alternatives for the intended use.

Data should preferably be presented on a unit basis that allows a comparison of the different alternatives and with the CfS (e.g. cost per square meter of treated surface and per year). The sources of data and its quality and reliability, the assumptions and uncertainties in the methodology of analysis and their impact on the conclusions of the assessment should be described.

The quantitative cost assessment may also include:

• The investment and recurrent costs for using the product with the alternative substance or non-chemical alternative, including how they may change over time.

• Other costs of substitution to the alternative – including equipment, training, energy use, regulatory costs, potential downtime and handling to the extent these are not covered under recurrent costs.

Include the qualification of the changes whether these constitute significant disadvantages or not.]

Conclusion on the economic feasibility of the alternative

[Based on the above, a conclusion on the economic feasibility of the alternatives should be drawn.

It should be clarified if the alternative can be considered economically feasible for sub-sets of the intended use or specific markets but not for others.

To the extent possible, if it is concluded that using the alternative is technically feasible but not economically feasible, possible actions from the applicant or other actors and timeframe within which economical feasibility could be achieved should be described, including obstacles or difficulties expected.]

Availability

[Describe whether the alternative is available (in the required quantity) without undue delay. In the event it is concluded that the alternative is not available, discuss what it will take to make this alternative available. Include any obstacles or difficulties identified or expected.]

Conclusion on the availability of the alternative

[Conclude in a clear and transparent manner whether the alternative is available (in the required quantity) without undue delay. In the event it is concluded that the alternative is not available, it should be described which actions would be necessary to make this alternative available. Obstacles or difficulties identified or expected should be reported.]

Other relevant information

[Report here other information considered relevant and important for the assessment of the alternatives and which has not been reported in the other sections of the report (e.g. broader sustainability aspects or impacts to society).]

Conclusion on the suitability and availability of alternative 1

[Provide here the overall conclusion on the suitability and availability of alternative 1]

#### Alternative substance 2

[Repeat the same sections (6.1.1.1.1 to 6.1.1.1.7) as for alternative substance 1. Add additional sections for other chemical alternatives.]

Non-chemical alternatives

[Repeat the same sections (6.1.1.1.1[[8]](#footnote-9) to 6.1.1.1.7) as for alternative substance 1 but for non-chemical alternatives. Add additional sections for other chemical alternatives.]

Overall comparison of alternatives for intended use 1 (summary table)

[Insert an overall conclusion and a summary table comparing all the alternatives for intended use 1].

INTENTED USE 2

[Repeat the same section 6.1 for intended use 2 (chemical and non-chemical alternatives). Add additional sections for other intended uses.]

EFFORTS TAKEN BY THE APPLICANT TO DEVELOP NEW ALTERNATIVES

[Describe - to the extent feasible[[9]](#footnote-10)- the efforts taken by the applicant or at industry sector level to develop new alternatives and/or the identified needs for making it happen.]

OVERALL CONCLUSION

[Provide an overall conclusion of the report, covering all intended uses. This comprises:

* A brief description of the steps taken to identify possible alternatives (including R&D efforts) and alternative providers.
* The main conclusions of the analysis regarding the identification of possible alternatives and the suitability and availability of these alternatives for all the identified uses (preferably in the format of a table).
* In the event there are no suitable and available alternatives, a summary of the actions needed or underway to make possible alternatives suitable and available and the timescale for these actions.]

REFERENCES

[Provide list of references]

Annex I – Justifications for Confidentiality Claims[[10]](#footnote-11)

[Include justifications for each item that you have claimed as confidential in the “public version” of the AoA. Give a clear numbered reference to each piece of information claimed confidential. Redacted items should be limited to a minimum and cover only that information for which disclosure presents a direct threat to commercial interests. The size of redacted text/figure should correspond to the actual size of the text/figure which has been redacted (e.g., if an entire page has been redacted, it should be visible in the “public version” that an entire page has been blanked out). Use the table below to report the blanked-out references, corresponding page number and justification.].

|  |  |  |
| --- | --- | --- |
| Redacted item reference | Page number | Justification for confidentiality |
| Blank # 1 | … | …. |
| Blank # 2 | … | … |
| … | … | … |

Example:

Public version of the analysis of alternatives:

[…]

Page 6

Annual Tonnage

Confidential average annual tonnage for use 1: . [Blank #1] .

Annual tonnage band for use 1: 10-40 tonnes per year

This tonnage represents the applicant’s total annual tonnage sold in the EU from its three factories located in the EU.

[…]

Table of justification for confidentiality in the Annex of the confidential version of the analysis of alternatives:

|  |  |  |
| --- | --- | --- |
| Redacted item reference | Page number | Justification for confidentiality |
| Blank #1 | 6 | [insert here your justification] |
| Blank #2 | 11 | [insert here your justification] |
| Blank #3 | 11 | [insert here your justification] |
| … | … | … |

Annex II – stakeholders’ involvement

[Document the stakeholders’ involvement undertaken during the analysis. Include details on:

* (the parts of) the supply chain(s) consulted[[11]](#footnote-12);
* other organisations contacted;
* potential alternatives that have been identified through this process and evidence of (non)availability of alternatives.]

\_\_\_\_\_\_\_

Additional Annexes

[Include other complementary information that you consider relevant for the analysis of alternatives, e.g., list of data sources, data collection approach, summary of assumptions, methodologies, etc.].

1. E.g. to the extent known, from the applicant’s dossier or active substance assessment report, if available. [↑](#footnote-ref-2)
2. Details of required technical specifications should be provided in section “Description of the technical requirements that must be achieved by the product(s) and treated articles” [↑](#footnote-ref-3)
3. Only biocidal products authorised under the BPR or under the transitional measures. [↑](#footnote-ref-4)
4. These intended use descriptions and categorisations will be used in the section on suitability and availability of alternatives (each alternative assessed per intended use). [↑](#footnote-ref-5)
5. To the extent the information is known and not breaching competition law. Ranges can be provided if precise figures are confidential. There is no need to provide detailed information as the aim is to have a general picture of the market to understand the context and the importance of the use of the AS. More detailed information and analysis on this topic can be provided separately in a socio-economic analysis. Basic high-level information can often be available e.g. from business sector associations public data, open literature, biocidal product factsheets from ECHA’s website. More detailed information can also be obtained from paying market research consultancies. [↑](#footnote-ref-6)
6. These tonnage bands are usually not considered confidential [↑](#footnote-ref-7)
7. cases where the alternative takes a longer (or shorter) time to have an effect in eliminating/controlling the target organism or if higher (or lower) amounts of the active substance or biocidal product are needed to achieve the same result. [↑](#footnote-ref-8)
8. Section 6.1.1.1.1 “Substance identity and properties” is here replaced by “Description of the non-chemical alternative” which should comprise a description of the means of control or of the prevention method: its identity and biological properties, how the method is implemented, what it does precisely and under which conditions. [↑](#footnote-ref-9)
9. i.e. to the extent known and without breaching anti-trust law or other applicable legislation. [↑](#footnote-ref-10)
10. This annex will not be made publicly available on ECHA’s website as part of the BPR Art.10(3) third party consultation. [↑](#footnote-ref-11)
11. Sharing and publishing supply chain specific information may be subject to competition rules. [↑](#footnote-ref-12)