



Socio- economic analysis in REACH – from a NGO perspective

Vito Buonsante, Client Earth
Sonja Haider, ChemSec
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@clientearth www.clientearth.org



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chemsec
INTERNATIONAL CHEMICAL SECRETARIAT



@chemsec

www.chemsec.org

SEA in REACH



- Relative importance of SEA vs the Analysis of Alternatives
- Flexible perspective of Technical and Economic Feasibility
- Include a wider perspective on costs and benefits in the socioeconomic analysis
- Do not disfavour users and producers of alternatives



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.*

Assessment of alternatives



- Assessment of alternatives is key for REACH to fulfill its aims
- Assessment of alternatives is a mandatory element in REACH (authorisation and restrictions)
- SEA are not mandatory [and have a residual role]



Missed opportunities



- Adaption to changes is underestimated in performance of products and to initial higher prices
- The concept of economic feasibility of alternatives is rigid, difficult to match and does not drive innovation
- Burden of proof is on the applicant-not on the the alternative providers



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



SEA's bias to present



- The future is not less important than the present
- Lack of adaptability
- Qualitative assessments missing
- Too big focus on costs, little on benefits
- Lack of precaution
- ...



See the Bigger Picture



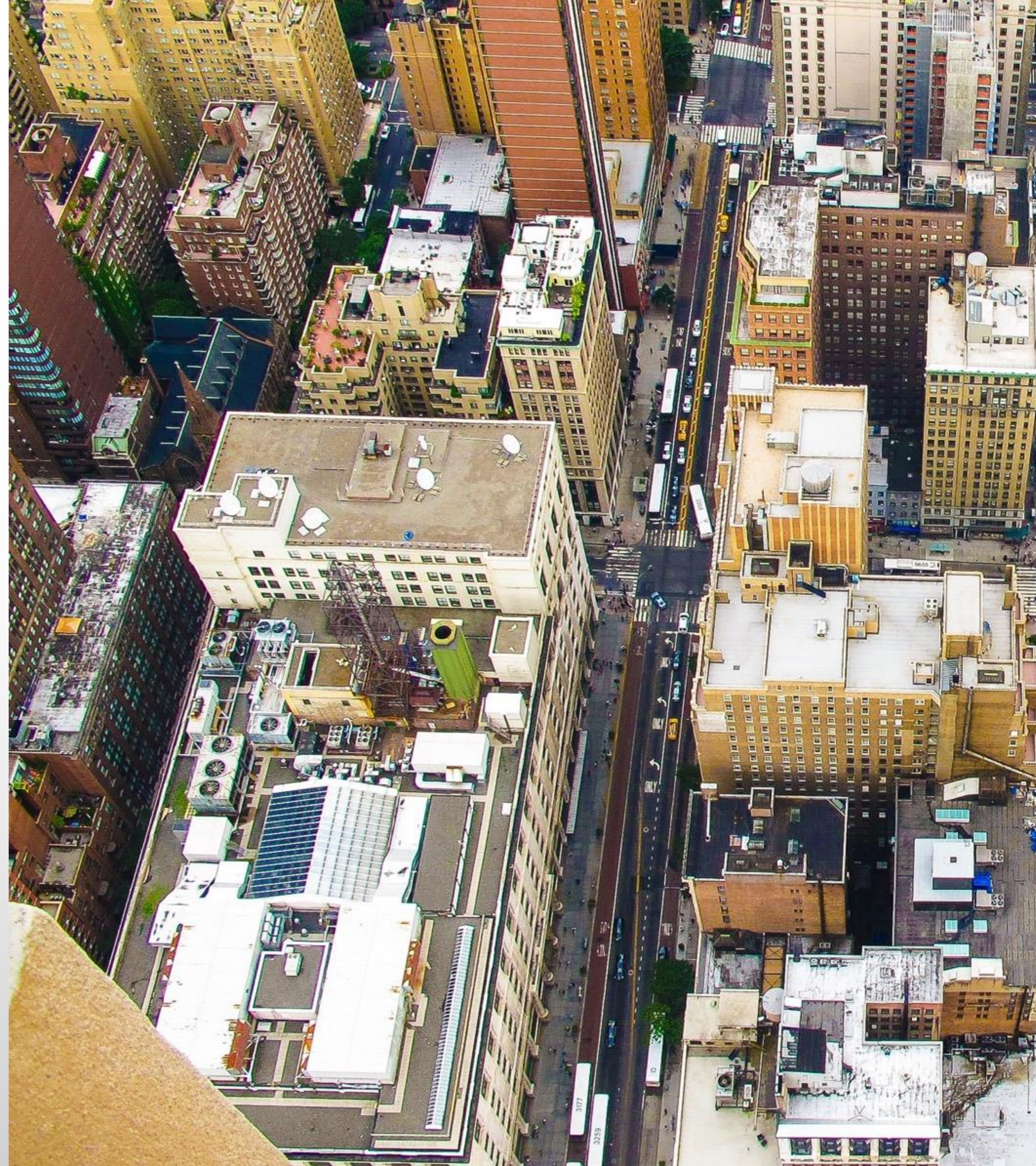
- Broadening the picture by inclusion of economical effects on
 - Alternative producers
 - Alternative users
- Examples:
 - Lead chromates in pigments
 - DEHP



Cap on costs for society



- „Benefits outweigh the risks“ – Which amount of costs has a society accept to bear?
- 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)
- Example: Chromium Trioxide, CTAC





Narrow the scope

- „Upstream applications“ need well-defined scope to reduce lack of data, knowledge on supply chain applications, applications
- Match of alternatives must be possible

Positive Effects of Authorisation



- Innovation potential
- Safer and healthier materials and products
- Phasing-out of hazardous chemicals and their negative effects
- Transparency in supply chains and for end consumers



Summary



- Flexible perspective of Technical and Economic Feasibility
- Assessment of alternatives
- Recognition of adaptability
- Future generations matter
- Broaden the picture of SEA
- Size of societal costs matter
- Well-defined scope allows a match with existing alternatives



Thank you for listening

Email | vbuonsante@clientearth.org

Email | sonja.haider@chemsec.org

Web | clientearth.org

Web | chemsec.org

