Experiences from industry associations
Lessons learned from public consultation, trialogue and opinion making

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Authorisation

- Complex and new procedure
  - « Many unknowns » for all participants in the process
  - Only « one chance » for industry to make a good application
    - Risk of overloading the application
    - Risk of depending from others
  - « Uncertainty » will remain until some authorisations have been granted
  - Different players in the game, speaking « different » languages
  - Open minded and constructive approach from ECHA

Public consultation

- Does it bring what was expected?
- Was the expectation realistic?

Public consultation

- **Major differences between « manufacturers, formulators and downstream users »**
  - **Alternatives available to the applicant**
  - **If not available for manufacturers but available for DU, the market will decide**
  - **Downstream users closer to « product choice » decision**

Public consultation

- Potential risk to become:
  - A new marketing tool from companies to promote their substances, not only potential alternatives, but also failures from the past
    - Dating services can be of help?
  - A catalogue of alternatives not fully tested yet
    - How to ensure the quality/relevance check on the proposals?

Public consultation

- « A clearly documented analysis » of alternatives including the alternatives tested and those failed in the use(s) will be very helpful
- « Not tested alternatives » are not feasible now, but reflection needed how to integrate them in future research activities

Trialogue

- **« Extremely helpful » in the process if very well prepared by the applicant**
- **Participants may have « different interests »**
- **They all « come from planet earth » discussing in « a Babylonian tower »**
  - What seems to be clear for industry, is not always clear for authorities and vice versa
- **Little time to prepare the answers on the questions, be well organised**

Trialogue

- Importance to provide visual support
  - 1 picture tells more than 1000 words
- It is like an examination: be clear, didactic and complete (1 opportunity)
  - Why proposed alternative is (not) suitable – functionality – specificity – quality system, etc…
  - How to proceed with information coming late?
- Closed session foreseen to share detailed confidential information (CSR, prices,…)

Opinion making

- So far done in a very professional way
- Potential Risks:
  - The trap of the detail is existing
  - The scientific « curiosity » of the Committees may result in only « gold plated » applications that are good enough
- Again, an application that is clear to industry is not always clear to experts

Opinion making

- Process runs quite smoothly and efficient
- Critical but realistic attitude towards “review times”
- Difficult cases still to come
- How to communicate horizontal learning lessons ? (e.g. authorisation and waste)

Opinion making

- In some discussions, observers could have been useful in explaining some points during the discussion
- Without changing the actual rules, at least the Committee members can ask observers to give a clarification if this need is felt