

**16 November 2022**

**SEAC/M/56/2022 FINAL**

**Final**

**Minutes of the 56<sup>th</sup> meeting of the Committee for Socio-economic Analysis**

**6–9 September  
and  
13-14 September 2022**

## **I. Summary Record of the Proceeding**

### **1) Welcome**

María Ottati, Chair of the Committee for Socio-economic Analysis (SEAC), ECHA, welcomed the participants to the 56<sup>th</sup> meeting of SEAC.

The Chair informed the participants that the meeting would not be recorded. The list of attendees is given in Part III of the minutes.

### **2) Adoption of the Agenda**

The Chair introduced the final draft agenda of SEAC-56. The agenda was adopted without modifications (in line with SEAC/A/56/2022). The Chair mentioned that the meeting would be partly chaired by the Deputy Chair Kalle Kivelä.

The final agenda is attached to these minutes as Annex III. The list of all meeting documents is attached to these minutes as Annex I.

### **3) Declarations of conflicts of interest to the Agenda**

The Chair requested members and their advisors participating in the meeting to declare any conflicts of interest with any of the specific agenda items. Two members and one advisor declared potential conflicts of interest regarding the substance-related discussions under Agenda Item 5.2b-2. Two members declared potential conflicts of interest regarding the substance-related discussions under Agenda Item 5.2b-1. These members did not participate in voting under those Agenda Items, as stated in Article 9(2) of the SEAC Rules of Procedure.

The Chair declared her absence of conflict of interest for all items of SEAC-56 plenary meeting. She noted that the Deputy Chair was involved in the preparation of the Annex XV dossier for the PFASs in Firefighting Foams restriction proposal, and would therefore not participate in discussions, but that he had no conflict of interest for the other items on the agenda.

The list with declared conflicts of interest is given in Annex II of these minutes.

### **4) General SEAC procedures**

#### **a) Report on SEAC-55 action points and written procedures**

The Chair informed the participants that all action points of SEAC-55 had been completed or would be followed up during the on-going SEAC-56 meeting.

The Chair also informed the Committee that the final minutes of SEAC-55 had been adopted by written procedure and had been uploaded to S-CIRCABC as well as on the ECHA website.

Representatives of the Commission updated the Committee on SEAC-related developments in the REACH Committee and in CARACAL. The Commission also provided an update on the REACH review.

## **5) Restrictions**

### **5.1 General restriction issues**

#### **1. Status update from Working Group on qualitative assessments**

A representative from the Working Group on qualitative assessments provided an update on and SEAC discussed the progress made towards drafting a paper on SEAC's evaluation of qualitative assessments in Annex XV restriction dossiers. The members supported the approach taken and proposed some further ideas to be developed in the paper by the working group (related to scientific references, prioritising impacts, how to combine qualitative with quantitative evidence etc.). The Secretariat will launch a written commenting round on the revised paper prior to SEAC-57 and table it for agreement at the December 2022 plenary meeting.

#### **2. Updated RAC and SEAC Working procedures on restrictions**

The Secretariat provided a presentation on and SEAC discussed the revisions of the RAC and SEAC working procedure on opinion development. The working procedure was revised based on the opinion cycle approach and integration of the RAC working group into the opinion development process. Furthermore, SEAC took note of and discussed the updates in the opinion format for assessing restriction proposals. SEAC members and regular stakeholder observers provided further feedback for developing the working procedure and of the opinion template.

SEAC agreed on the revised working procedure for RAC and SEAC for opinion development on Annex XV restriction dossiers and the document will be published on the ECHA website. SEAC members were requested to continue providing feedback on the new opinion template, where relevant.

### **5.2 Restriction Annex XV dossiers**

#### **a) Conformity check and key issues discussion**

##### **1) Medium-chain chlorinated paraffins (MCCP) and other substances that contain chloroalkanes with carbon chain lengths within the range from C14 to C17**

The Chair welcomed the Dossier Submitter's representatives from ECHA. She informed the participants that the restriction dossier was submitted in July 2022 and concerns the manufacture, use and placing on the market of substances, mixtures and articles containing C14-17 chloroalkanes with PBT- and/or vPvB-properties.

The conformity check process was launched on 18 August and the SEAC commenting round finished on 29 August (no comments received from SEAC members). The Chair informed the participants that RAC would conclude on the conformity of the Annex XV dossier at RAC-62.

The Dossier Submitter's representatives provided an introductory presentation on the restriction proposal. The SEAC rapporteurs then presented the outcome of the conformity check and the recommendations to the Dossier Submitter. The Committee agreed that the dossier conforms to the Annex XV requirements. The Chair informed the Committee that

the six-month consultation of interested parties on the restriction proposal will be launched on 21 September 2022.

## **b) Opinion development**

### **1) Terphenyl, hydrogenated – First draft opinion**

The Chair welcomed the Dossier Submitter's representative from Italy. She informed the participants that the restriction dossier was submitted in April 2022.

The SEAC rapporteurs then presented the first draft opinion. Members commented on the scope/ the derogation for uses in the aerospace industry, on the lack of information on alternatives for the use as a heat transfer fluid and uses in the aerospace industry. The Commission commented on the clarity of the wording of the derogations. Members discussed the justification for the transition period for the aerospace industry. Members also commented on the difficulties to evaluate the analysis of alternatives for the use as a plasticiser, due to the limited information. Members and the Commission commented on the uncertainties related to the emissions from the use as a heat transfer fluid. Regular stakeholder observers (EEB and ClientEarth) commented on the appropriateness of restriction compared to authorisation.

The Chair concluded that there was general support by SEAC on the justification for action on Union-wide basis and that a restriction under REACH is the most appropriate EU-wide measure. Regarding the costs assessment, SEAC supported the Dossier Submitter's approach, but also recognised that the cost assessment for some parts of the dossier would require further scrutiny. SEAC discussed the benefits of the restriction if the most plausible scenario would be a regrettable substitution.

The (co-)rapporteurs were requested to prepare the second draft opinion by November 2022, considering the SEAC-56 discussions, the comments received from the SEAC written commenting round and the comments from the Annex XV report consultation.

### **2) *N,N*-dimethylacetamide and 1-ethylpyrrolidin-2-one – First draft opinion**

This agenda item was chaired by the Deputy Chair. The Chair welcomed the Dossier Submitter's representatives from the Netherlands. He informed the participants that the restriction dossier was submitted in April 2022.

The SEAC rapporteurs then presented the first draft opinion. An accompanying expert to a regular stakeholder observer (Cefic) and an occasional stakeholder observer (CIRFS) commented on whether the suggested restriction is the most appropriate EU-wide measure. Members, accompanying experts to regular stakeholder observers (Cefic, MedTech Europe), an occasional stakeholder observer and their accompanying expert (CIRFS) also commented on the cost assessment. An occasional stakeholder observer (CIRFS) also commented on the benefits.

The Chair concluded that there was provisional agreement by SEAC on the justification for action on Union-wide basis, on the scope of the restriction covering the two substances and that a restriction under REACH is the most appropriate EU-wide measure. Furthermore, SEAC supported the Dossier Submitter's estimates for the quantitatively assessed costs and the rapporteurs approach to describe alternatives.

The (co-)rapporteurs were requested to prepare the second draft opinion by November 2022, considering the SEAC-56 discussions, the comments received from the SEAC written commenting round and the comments from the Annex XV report consultation.

### **3) Per- and polyfluoroalkyl substances (PFASs) in firefighting foams – Second draft opinion**

The Chair welcomed the Dossier Submitter's representatives from ECHA and the RAC rapporteurs. She informed the participants that the restriction dossier was submitted in January 2022 by ECHA.

The RAC rapporteurs informed the Committee that RAC had discussed its second draft opinion at the RAC working group on restrictions and summarised the conclusions reached. RAC-62 will hear a report back from the working group on restrictions the following week.

The SEAC rapporteurs then presented the second draft opinion. The Commission commented on the scope of the proposed restriction. Accompanying experts to regular stakeholder observers (EEB and Cefic), invited experts (Lastfire and WFVD) and an occasional stakeholder observer (Eurofeu) commented on the availability of alternatives. Members and the Commission commented on costs and benefits. Members, the Commission, accompanying experts to regular stakeholder observers (EEB and Cefic), an invited expert (WFVD) and occasional stakeholder observers (Eurofeu, Eureau) commented on transitional periods, the proposed review of some transitional periods, proportionality, and practicality.

The Chair concluded that there were a number of topics to consider in the next version of the draft opinion, in particular regarding cost-effectiveness analysis, availability of alternatives and transition periods.

The (co-)rapporteurs were requested to prepare the third draft opinion by November 2022, considering the SEAC-56 discussions, the comments received from the SEAC written commenting round and the comments from the Annex XV report consultation.

### **4) Substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for shooting – Second draft opinion**

The Chair welcomed the Dossier Submitter's representatives from ECHA and the RAC rapporteurs. She informed the participants that the restriction dossier had been submitted in October 2021. The RAC rapporteurs informed the Committee that RAC had discussed its third draft opinion at the RAC62 working group on restrictions, and summarised the conclusions made. RAC will be expected to adopt its opinion at RAC-62.

The SEAC rapporteurs then presented the second draft opinion. The members commented on the scope and benefits (related to discounting) and the Commission observer commented on the scope (i.e., the legal interpretation of vessels used in EU waters) and the conclusion on the transition period. The Chair concluded that there was full support and agreement by SEAC on the Rapporteurs' conclusions on the scope of the restriction e.g. the 18 indicator PAHs proposed by the Dossier submitter was endorsed. Furthermore, SEAC supported the benefits assessment, and the rapporteurs will make editorials to

ensure that it is clear in the opinion that SEAC is not concluding on the appropriateness of discounting emissions (as done by the Dossier Submitter). The accompanying expert (DEZA) to regular stakeholder observers (CEFIC) commented on scope and on transitional period.

The Committee agreed on its draft opinion by consensus, with editorials as agreed at SEAC-56. The rapporteurs were requested, together with the Secretariat, to do the final editing of the SEAC draft opinion and to ensure that the supporting documentation (BD and RCOM) is in line with the agreed SEAC draft opinion. The Chair informed the Committee that Secretariat would launch the consultation on the SEAC draft opinion on 14 September 2022. Furthermore, SEAC is expected to adopt its final opinion at SEAC-57.

### **5) Lead in outdoor shooting and fishing tackle – State of play of the third-party consultation on the SEAC draft opinion**

The Chair welcomed the Dossier Submitter's representatives from ECHA, the regular and occasional stakeholders and their accompanying industry experts, invited experts, as well as the members of the SEAC support group which was established to support the rapporteurs in the development of the opinion. The SEAC rapporteurs presented an update on the state of play of the third-party consultation on SEAC draft opinion.

Furthermore, the Chair reminded all participants that the SEAC opinion development has been extended until December 2022 and SEAC is expected to adopt its opinion at SEAC-57.

### **6) 2,4-dinitrotoluene – Final draft opinion**

This agenda item was chaired by the Deputy Chair. He welcomed the Dossier Submitter's representatives from ECHA and the RAC rapporteur. He informed the participants that the restriction dossier was submitted in August 2021 under Art 69(2) of REACH and had followed a simplified opinion development approach. The SEAC rapporteur then presented the draft of the final opinion to the Committee.

The Committee adopted its final opinion by consensus. The rapporteur was requested, together with the Secretariat, to do the final editing of the SEAC draft opinion and to ensure that the supporting documentation (BD and RCOM) is in line with the adopted SEAC final opinion.

### **5.3 Appointment of (co-)rapporteurs for restriction dossiers**

SEAC was provided a brief report back on the upcoming restriction proposals.

## **6) Authorisation**

### **6.1 General authorisation issues**

#### **a) Update on incoming/future applications**

The Secretariat presented information on incoming/future applications for authorisation and review reports, expected workload in 2022 and beyond, and timelines.

SEAC took note of the update on the new applications for authorisation received during the August 2022 submission window and other AfA-related updates, and discussed options for streamlining the opinion-making process for AfAs.

#### **b) Update of technical guidance for rapporteurs**

The Secretariat presented and SEAC discussed the updated version of the technical guidance for rapporteurs.

The Secretariat will consider the discussion and update the document and will publish it on S-CIRCABC.

#### **c) Discussion on SAGA**

The Secretariat presented and SEAC discussed proposals on practical approaches to deal with issues previously encountered in concluding on whether technically and economically feasible alternatives are generally available.

There was general support for the proposed approaches, and it was agreed that the issue of geographical boundaries for alternatives would be further discussed with the Commission and the conclusions brought to SEAC-57.

The Secretariat will consider the discussion and will update the relevant material (such as the technical guidance for rapporteurs), as well as publish it on S-CIRCABC.

#### **d) Discussion on economic feasibility**

The Secretariat presented and SEAC discussed a proposal for how to clarify the concept of economic feasibility.

There was general support from SEAC members for the Secretariat's proposal to create an entry in the Technical Guidance for Rapporteurs and to develop a Questions and Answers entry for publication on the ECHA website, and some comments on the scope of these. The representatives of Eurometaux and ClientEarth contributed to the discussion.

The Committee agreed that the Secretariat with the assistance of SEAC members will draft a Questions and Answers document to be referred to from the SEAC note on how the Committee evaluates economic feasibility in applications for authorisation. This Q&A document will be included in the agenda of the next SEAC-57 plenary meeting for discussion.

### **6.2 Authorisation applications**

#### **a) Discussion on key issues**

- 1) 14 applications for authorisation (chromium (VI) substances) and 1 review report (diglyme) from May (3) and August (11) 2022 submission windows - key issues discussion

The Secretariat, in cooperation with the SEAC rapporteurs, provided general information regarding the new applications for authorisation and review report, and specified the identified key issues in the applications listed below:

- 260\_CT\_SARREL (single use)
- 262\_CT\_Cromoplastica (two uses),
- 270\_CT\_Maier (two uses),
- 273\_CT\_MikroMetal (single use),
- 274\_CT\_SD\_ArcelorMittal (two uses),
- 275\_CT\_Sicrom (single use),
- 276\_CT\_Osmaplast (two uses),
- 277\_CT\_Ritmonio (single use),
- 278\_RR1\_Diglyme\_Isochem (single use),
- 279\_CT\_GalvanoPlus (single use),
- 280\_CT\_Tecnocrom\_Industrial (two uses),
- 281\_CT\_Electro\_Durocrom (single use),
- 282\_CT\_Hazet\_Werk (single use),
- 283\_CT\_KYB (single use),
- 284\_CT\_CGS (single use).

## **b) Agreement on draft opinion**

### 1. 253\_CT\_GEA-Westfalia (1 use)

This is an application for authorisation on a single use of chromium trioxide:

Use 1: Chromium trioxide-based functional chrome plating of machine components for centrifugal separator and decanter centrifuges.

SEAC members discussed the need to evaluate what the applicant's competitors in the same market segment are doing in terms of availability of alternative substances or technologies.

The Committee agreed on the draft opinion by consensus. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinion. The Secretariat will send the draft opinion to the applicant for commenting.

### 2. 254\_CT\_Ratier-Figeac (2 uses)

This is an application for authorisation on two uses of chromium trioxide:

Use 1: Industrial use of chromium trioxide for functional chrome plating of aircraft safety critical steel ball screws used in airplane's actuators, to decrease friction ratio, and enhance wear, corrosion, and endurance resistance, enabling targeted service life.

Use 2: Industrial use of chromium trioxide for the chromic acid anodizing of aluminum spars as critical surface preparation phase for bonding with aircraft safety critical propeller blades to secure reliable bonding performance and enhance spars corrosion resistance.

SEAC members discussed a length of the review period and lost profits for Use 1.



The Committee agreed on the draft opinions by consensus. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinions. The Secretariat will send the draft opinions to the applicant for commenting.

### 3. 255\_CT\_Chrom-Mueller (3 uses)

This is an application for authorisation on three uses of chromium trioxide:

Use 1: Industrial use of chromium trioxide for high ratio aspects inside hard chromium coating of firearms barrel bores subject to thermal, mechanical and chemical stresses, in order to provide wear resistance properties, as well as low friction coefficient, hardness, resistance to corrosion and gas erosion properties.

Use 2: Industrial use of chromium trioxide in the hard chromium coating of complex outer surfaces of firearm auxiliary parts subject to mechanical, chemical and thermal stress in order to provide optimized sliding properties as well as heat, corrosion and wear resistance properties.

Use 3: Industrial use of chromium trioxide in the hard chromium coating of complex outer and inner surfaces of firearms auxiliary parts requiring a customised and selective coating technique and subject to thermal, mechanical and chemical stresses, in order to provide wear resistance and barrier properties, as well as post-processing capability and resistance to hot combustion gas erosion.

SEAC members discussed impacts of not granting the authorisation, lengths of the review periods and certain aspects of performance of parts plated with an alternative technique.

The Committee agreed on the draft opinions with editorials agreed at SEAC-56 by consensus. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinions. The Secretariat will send the draft opinions to the applicant for commenting.

### 4. 256\_CT\_KaVo-Dental (1 use)

This is an application for authorisation on a single uses of chromium trioxide:

Use 1: Chromium trioxide based functional chrome plating of dental instruments applied by professionals for dental treatment.

SEAC members discussed performance of one of the alternative methods and economic factors for its rejection, as well as the opinion's consistency with the other adopted opinions in the same field of activities. A representative of ClientEarth contributed to the discussion.

The Committee agreed on the draft opinion by consensus. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinion. The Secretariat will send the draft opinion to the applicant for commenting.

### 5. 257\_CT\_Qualipac (1 use)

This is an application for authorisation on a single use of chromium trioxide:

Use 1: Industrial use of chromium trioxide for the etching of polypropylene (PP) substrates, as a pretreatment step of the electroplating process, for the luxury sector and other applications.

SEAC members discussed the length of the review period, availability of alternative substances and technologies, quality of economic and technical infeasibility conclusions by

the applicant, substitution activities by the applicants A representative of ClientEarth contributed to the discussion.

The Committee agreed on the draft opinion with editorials agreed at SEAC-56 by simple majority. A minority position of a SEAC member is published in Annex X to these minutes. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinion. The Secretariat will send the draft opinion to the applicant for commenting.

#### 6. 258\_CT\_Schulte (2 uses)

This is an application for authorisation on two uses of chromium trioxide:

Use 1: Chromium trioxide-based functional chrome plating of large components and small components with complex geometries and/or requiring special approval procedures for their application in demanding sectors such as medical, aerospace, defence and mining industry.

Use 2: Chromium trioxide-based functional chrome plating of small components with simple geometries not requiring special approval procedures for their application in demanding sectors such as hydraulic systems, food, paper and chemical industry.

SEAC members discussed the applicants' research and development activities and their costs, lengths of the review periods, scopes of the two uses the applicants have applied for, the applicants' involvement in substitution activities, as well as a particular alternative shortlisted by the applicants. A representative of Eurometaux contributed to the discussion.

The Committee agreed on the draft opinions with editorials agreed at SEAC-56 by consensus. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinions. The Secretariat will send the draft opinions to the applicants for commenting.

#### 7. 259\_CT\_ST-SRL (1 use)

This is an application for authorisation on a single uses of chromium trioxide:

Use 1: Use for electroplating of different types of substrates with the purpose to create a long-lasting high durability surface with bright (shiny) or matte look (functional electroplating with decorative character).

SEAC members discussed availability of suitable alternatives in general and economic and technical feasibility of alternatives. A representative of ClientEarth contributed to the discussion.

The Committee agreed on the draft opinion with editorials agreed at SEAC-56 by consensus. The rapporteurs, together with the Secretariat, will do the final editing of the SEAC draft opinion. The Secretariat will send the draft opinion to the applicant for commenting.

### **c) Adoption of opinion**

#### 1. 231\_CT\_Kesseboehmer (1 use)

This is an application for authorisation on a single use chromium trioxide:

Use 1: Use of chromium trioxide for decorative/functional application in the furniture, sanitary and automotive sector.

It was received by the Committee in May 2021. SEAC agreed on the draft opinion during SEAC-54 plenary meeting. On 14 July 2022 the applicant submitted comments on the draft opinion.

The Committee discussed representativity of the customers' survey by the applicant. A representative of Eurometaux contributed to the discussion.

The Committee adopted the opinion by consensus. The rapporteurs, together with the Secretariat will do the final editing of the SEAC opinion. The Secretariat will send the opinion to the Commission, the Member States and the applicant, and publish it on the ECHA website.

## 2. 241\_CT\_Gessi (1 use)

This is an application for authorisation on a single use chromium trioxide:

Use 1: Use of chromium trioxide for electroplating of metal substrates with the purpose of creating a long-lasting high durability surface with bright look for kitchen and bathroom sanitaryware (functional plating with decorative character).

It was received by the Committee in August 2021. SEAC agreed on the draft opinion during SEAC-54 plenary meeting. On 18 July 2022 the applicants submitted comments on the draft opinion.

SEAC members discussed a few comments on the draft opinion by the applicants about availability of alternatives and the Committee's responses, as well as consistency of the Committee's opinions for the same industrial sectors. A representative of Eurometaux contributed to the discussion.

The Committee adopted the opinion by consensus. The rapporteurs, together with the Secretariat will do the final editing of the SEAC opinion. The Secretariat will send the opinion to the Commission, the Member States and the applicants, and publish it on the ECHA website.

### **6.3 Appointment of (co-)rapporteurs for authorisation applications (closed session)**

The pool of (co-)rapporteurs, as outlined in the restricted room document SEAC/56/2022/03 rev.1 was agreed by SEAC.

### **7) Requests under Article 77(3)(c)**

None.

### **8) AOB**

#### **a) Update of the work plan**

The Secretariat provided an update of the work plan for the future months.

#### **b) Update of the Restrictions Roadmap**

The Secretariat provided a brief update on the Restrictions Roadmap.

## **9) Action points and main conclusions of SEAC-56**

A table with the action points and main conclusions is given in Part II below.

**Main conclusions and action points  
SEAC-56, 6-9 September and 13 September 2022**

(Adopted at SEAC-56 meeting)

<b>Agenda point</b>	
<b>Conclusions / decisions / minority opinions</b>	<b>Action requested after the meeting (by whom/by when)</b>
<b>2. Adoption of the agenda</b>	
The agenda was adopted without modifications (SEAC/A/56/2022).	
<b>3. Declarations of conflicts of interest to the Agenda</b>	
Conflicts of interest have been declared and will be included in the minutes.	
<b>4. General SEAC procedures</b>	
<b>a) Report on SEAC-55 action points and written procedures</b>	
SEAC was informed of the status of the action points of SEAC-55.  Furthermore, SEAC took note of the oral report from the Commission on SEAC-related developments in the REACH Committee and the CARACAL meeting, as well as the progress of the REACH revision.	
<b>5. Restrictions</b>	
<b>5.1 General restriction issues</b>	
<b>1. Status update from Working Group on qualitative assessments</b>	
The Working Group on qualitative assessments updated SEAC on the progress made towards drafting a paper on SEAC's evaluation of qualitative assessments in restriction reports.	<b>The WG</b> to take the feedback from SEAC into account for the further development of the paper.  <b>SECR</b> to launch a written commenting round on the paper prior to SEAC-57 and table it for agreement at the December 2022 plenary meeting.
<b>2. Updated RAC and SEAC Working procedure on restrictions</b>	
SEAC agreed on the revised working procedure for RAC and SEAC for opinion development on Annex XV restriction dossiers.	<b>SECR</b> to take the SEAC discussions into account for the further development of the working procedure and of the opinion template.  <b>SEAC members</b> to continue providing feedback on the new opinion template, where relevant.

Furthermore, SEAC took note of and discussed the updates in the opinion format for assessing the restriction proposals.	
<b>5.2 Restriction Annex XV dossiers</b>	
<b>a) Conformity check and key issues discussion</b>	
<b>1. Medium-chain chlorinated paraffins (MCCP) and other substances that contain chloroalkanes with carbon chain lengths within the range from C14 to C17</b>	
SEAC agreed that the dossier conforms to the Annex XV requirements.  SEAC took note of the recommendations to the Dossier Submitter.	<b>SECR</b> to compile the RAC and SEAC final outcomes of the conformity check and upload this to S-CIRCABC IG.  <b>SECR</b> to inform the Dossier Submitter on the outcome of the conformity check.
<b>b) Opinion development</b>	
<b>1. Terphenyl, hydrogenated – First draft opinion</b>	
SEAC rapporteurs presented and SEAC discussed the first draft opinion.	<b>Rapporteurs</b> to prepare the second draft opinion, considering SEAC-56 discussions and SEAC written consultation, by early November 2022.
<b>2. N,N-dimethylacetamide and 1-ethylpyrrolidin-2-one – First draft opinion</b>	
SEAC rapporteurs presented and SEAC discussed the first draft opinion.	<b>Rapporteurs</b> to prepare the second draft opinion, considering the SEAC-56 discussions, by early November 2022.
<b>3. Per- and polyfluoroalkyl substances (PFASs) in firefighting foams – Second draft opinion</b>	
SEAC rapporteurs presented and SEAC discussed the second draft opinion.	<b>Rapporteurs</b> to prepare the third draft opinion, considering the SEAC-56 discussions and the outcome of the third-party consultation, by early November 2022.
<b>4. Substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for shooting – Second draft opinion</b>	
SEAC rapporteurs presented and SEAC discussed the second draft opinion.  SEAC agreed on the draft opinion by consensus (with editorials as agreed at SEAC-56).	<b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinion and to ensure that the supporting documentation (BD and RCOM) is in line with the agreed SEAC draft opinion.

	<b>SECR</b> to launch a 60 day consultation on the SEAC draft opinion on 14 September 2022.
<b>5. Lead in outdoor shooting and fishing tackle – State of play of the third-party consultation on the SEAC draft opinion</b>	
SEAC rapporteurs provided an update on the outcome of the 60 days third party consultation on the SEAC draft opinion.	<b>Rapporteurs</b> to prepare the draft of the final opinion, considering the outcome of the third-party consultation, by end of October 2022.  <b>SECR</b> to table the draft of the final opinion for adoption at SEAC-57.
<b>6. 2,4-dinitrotoluene – draft of the SEAC final opinion</b>	
SEAC rapporteur presented and SEAC discussed the draft of the final SEAC opinion.  SEAC adopted the final opinion by consensus.	<b>Rapporteur</b> , together with the <b>SECR</b> , to do the final editorial changes to the adopted SEAC opinion and to ensure that the supporting documentation (Background Document and responses to comments from the consultation) is in line with the adopted SEAC opinion.  <b>SECR</b> to compile the adopted RAC and SEAC opinions, and to forward it to the Commission.
<b>6. Authorisation</b>	
<b>6.1 General authorisation issues</b>	
a) Update on incoming/future applications	
SEAC took note of the update on the new AfAs received during the August 2022 submission window and of the SECR's proposals to streamline the opinion-making for Applications for Authorisation.	
b) Update of technical guidance for rapporteurs	
The Secretariat presented and SEAC discussed the updated version of the technical guidance for rapporteurs.	<b>SECR</b> to consider the discussion and update the document, and to publish it on S-CIRCABC.
c) Discussion on SAGA	
The Secretariat presented and SEAC discussed the suggested approach to evaluating SAGA.	<b>SECR</b> to consider the discussion and to update the relevant material (such as technical guidance for rapporteurs), and to publish them on S-CIRCABC.  <b>SECR</b> to discuss remaining open issues with <b>COM</b> .
d) Discussion on economic feasibility	

<p>The Secretariat presented a proposal for how to clarify the concept of economic feasibility.</p>	<p><b>SECR</b> with the assistance of <b>SEAC members</b> to draft Q&amp;A document.</p> <p><b>SECR</b> to include the document for discussion on the next SEAC-57 plenary meeting agenda.</p>
<p><b>6.2 Authorisation applications</b></p>	
<p><b>a) Discussion on key issues</b></p>	
<p>14 applications for authorisation (chromium (VI) substances) and 1 review report (diglyme) from May and August 2022 submission windows</p>	
<p>SEAC discussed the key issues identified in the applications for authorisation and the review report.</p>	
<p><b>b) Agreement on draft opinions</b></p>	
<p>1) 253_CT_GEA-Westfalia (1 use)</p>	
<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinion.</p> <p>SEAC agreed on its draft opinion on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinion.</p> <p><b>SECR</b> to send the draft opinion to the applicant for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinion has been agreed by RAC.</p>
<p>2) 254_CT_Ratier-Figeac (2 uses)</p>	
<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinions.</p> <p>SEAC agreed on its draft opinions on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinions.</p> <p><b>SECR</b> to send the draft opinions to the applicant for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinions have been agreed by RAC.</p>
<p>3) 255_CT_Chrom-Mueller (3 uses)</p>	
<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinions.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinions.</p>



<p>SEAC agreed on its draft opinions (with editorials agreed at SEAC-56) on this application for authorisation by consensus.</p>	<p><b>SECR</b> to send the draft opinions to the applicant for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinions have been agreed by RAC.</p>
<p>4) 256_CT_KaVo-Dental (1 use)</p>	
<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinion.</p> <p>SEAC agreed on its draft opinion on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinion.</p> <p><b>SECR</b> to send the draft opinion to the applicant for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinion has been agreed by RAC.</p>
<p>5) 257_CT_Qualipac (1 use)</p>	
<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinion.</p> <p>SEAC agreed on its draft opinion (with editorials agreed at SEAC-56) on this application for authorisation by simple majority.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinion.</p> <p><b>SECR</b> to send the draft opinion to the applicants for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinion has been agreed by RAC.</p>
<p>6) 258_CT_Schulte (2 uses)</p>	
<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinions.</p> <p>SEAC agreed on its draft opinions (with editorials agreed at SEAC-56) on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinions.</p> <p><b>SECR</b> to send the draft opinions to the applicants for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinions have been agreed by RAC.</p>
<p>7) 259_CT_ST-SRL (1 use)</p>	

<p>SEAC rapporteurs presented and SEAC discussed the SEAC draft opinion.</p> <p>SEAC agreed on its draft opinion (with editorials agreed at SEAC-56) on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b> together with <b>SECR</b> to do the final editing of the SEAC draft opinion.</p> <p><b>SECR</b> to send the draft opinion to the applicant for commenting.</p> <p><b>Rapporteurs</b> and <b>SECR</b> to consider the need to come back to discussions in SEAC after the opinion has been agreed by RAC.</p>
<p><b>c) Adoption of opinion</b></p>	
<p>1. 231_CT_Kesseboehmer (1 use)</p>	
<p>SEAC adopted its opinion on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b>, together with <b>SECR</b>, to do the final editing of the SEAC opinion.</p> <p><b>SECR</b> to send the opinion to the Commission, the Member States, and the applicant, and to publish it on the ECHA website.</p>
<p>2. 241_CT_Gessi (1 use)</p>	
<p>SEAC adopted its opinion on this application for authorisation by consensus.</p>	<p><b>Rapporteurs</b>, together with <b>SECR</b>, to do the final editing of the SEAC opinion.</p> <p><b>SECR</b> to send the opinion to the Commission, the Member States, and the applicants, and to publish it on the ECHA website.</p>
<p><b>6.3 Appointment of (co-)rapporteurs for authorisation applications (closed session)</b></p>	
<p>SEAC agreed on the updated pool of (co-) rapporteurs for applications for authorisation (considered as agreement on appointment in line with the restricted room document SEAC/56/2022/03_rev1).</p>	<p><b>SEAC members</b> to volunteer to the pool of (co-) rapporteurs for applications for authorisation.</p> <p><b>SECR</b> to upload the updated document to confidential folder on S-CIRCABC.</p>
<p><b>9. Action points and main conclusions of SEAC-56</b></p>	
<p>SEAC adopted the action points and main conclusions of SEAC-56.</p>	



<b>Stakeholder observers &amp; accompanying experts</b>
BALLACH Jochen as occasional stakeholder (CIRFS)
BARBU Luminita as occasional stakeholder (EDANA)
BOCK Ronald as accompanying expert to Plastics Europe for PFAS
de BADEREAU Vincent as occasional stakeholder (EPEE)
CONSOLI Elisa as accompanying expert to EPEE for PFAS
DUGUY H��l��ne as regular stakeholder (ClientEarth) EPEE
DYEKJAER Sidsel as regular stakeholder (ChemSec)
EICHLER-HAESKE Jens-Olaf as accompanying expert to CEFIC
FERNANDEZ Ana as regular stakeholder (EEB)
GANZ Ingo as accompanying expert to EDANA for DMAC/NEP
HANNEBAUM Peter as accompanying Expert to EUROFEU for PFAS
HOLLAND Mike as regular stakeholder (EAERE)
HOWICK Chris as accompanying expert to CEFIC for MCCP
H��K Frida as regular stakeholder (ChemSec)
J��NOSI Amaya as regular stakeholder (CEFIC)
KALLER Martin as accompanying expert to CEFIC for PFAS
KLEIMARK Jonatan as accompanying expert to ChemSec for PFAS
LOEBEL Oliver as occasional stakeholder (EurEau)
McMILLAN Neil as accompanying expert to ClientEarth for PFAS
PAIN Debbie as accompanying expert to EEB for Lead
PUUSTINEN Seppo as occasional stakeholder (FACE)
ROBIN Nicolas as regular stakeholder (Plastics Europe)
RUELENS Paul as occasional stakeholder (CropLife Europe)
SANTOS Roumiana as regular stakeholder (MedTech Europe)
SEBASTIANI Giuliana as accompanying expert to Eurometaux
WAETERSCHOOT as regular

<b>Advisors, invited experts, observers &amp; dossier submitters</b>
ASSMANN Mervi as advisor to Johanna KIISKI
AVERBECK Frauke (baua) as invited expert for PFAS
BEEKMAN Martijn (RIVM) as invited expert for PFAS
BLAINEY Mark (ECHA) as dossier submitter for 2,4 DNT
CARLSSON FENG Mattias (Swedish Chemicals Agency) as invited expert for PFA
CATONE Tiziana as dossier submitter for Terphenyl
CLEVER Michaela as advisor to Andreas L��UDEKE
CROMIE Ruth (UNEP/AEWA) as invited expert for Lead
DANNENBERG Carl (baua) as invited expert for PFAS
de BLAEIJ Arianne as advisor to Martien JANSSEN
DERELIEV Sergey (UNEP/AEWA) as invited expert for Lead
HARD Sebastiana as advisor to Silke GABBERT
HELMEDACH Achim as advisor to Karen THIELE
JONGENEEL Rob as dossier submitter for DMAC-NEP
LEFEVRE Sandrine (ECHA) as dossier submitter for Lead
LOGTMEIJER Christiaan (ECHA) as dossier submitter for Lead
MORO IACOPINI Sabrina as advisor to Stefano CASTELLI
NURMI V��in�� (ECHA) as dossier submitter for PAHs
PELTZER Eike (E.P. FIRE) as invited expert for PFAS
PETERS Oliver as advisor to Karen THIELE
URBAN Klaus as adviser to Michael B��CKER
RAMSDEN Niall as dossier submitter for PFAS
UUSI-RAUVA Christa (Aalto University) as invited expert

stakeholder (Eurometaux)

#### **IV. List of Annexes**

- ANNEX I. List of documents submitted to the members of the Committee for Socio-economic Analysis
- ANNEX II. Declared conflicts of interest
- ANNEX III. Final Agenda

**ANNEX I****Documents submitted to the members of the Committee for Socio-economic Analysis**

<b>Document</b>	<b>Number</b>
Final Draft Agenda	SEAC/A/56/2022
Appointment of (co-)rapporteurs for restriction dossiers	SEAC/56/2022/02 (restricted room document)
Appointment of (co-)rapporteurs for authorisation applications	SEAC/56/2022/03 (restricted room document)

## DECLARATIONS OF CONFLICTS OF INTEREST TO THE RESPECTIVE AGENDA ITEMS

The following participants declared conflicts of interests with the agenda items below (according to Article 9(2) of the SEAC Rules of Procedure):

<b><u>Name of participant</u></b>	<b><u>Agenda item</u></b>	<b><u>Interest declared</u></b>
Silke GABBERT	5.2b-2) N,N-dimethylacetamide; 1-ethylpyrrolidin-2-one (NEP)	Works for the MSCA submitting the dossier
HARD Sebastiana (Adviser to SEAC M Silke GABBERT)	5.2b-2) N,N-dimethylacetamide; 1-ethylpyrrolidin-2-one (NEP)	Worked on preparing the dossier
Martien JANSSEN	5.2b-2) N,N-dimethylacetamide; 1-ethylpyrrolidin-2-one (NEP)	Worked on preparing the dossier
Stefano CASTELLI	5.2b-1) Terphenyl, hydrogenated	Working for the MSCA submitting the dossier
Priscilla REALE	5.2b-1) Terphenyl, hydrogenated	Working for the MSCA submitting the dossier
KIVELÄ Kalle (Deputy Chair)	5.2b-3) PFAS in fire-fighting foams	Worked on preparing the dossier

30 August 2022  
SEAC/A/56/2022

**Final Draft Agenda**  
**56th meeting of the Committee for Socio-economic Analysis**

**6-9 September**  
**and**  
**13-14 September 2022**

**Hybrid meeting**

**Tuesday 6 September starts at 10.00**  
**Friday 9 September breaks at 12.30**  
**Tuesday 13 September resumes at 10.00**  
**Wednesday 14 September ends at 13.30**

**Item 1 – Welcome and Apologies**

**Item 2 – Adoption of the Agenda**

**SEAC/A/56/2022**  
***For adoption***

**Item 3 – Declarations of conflicts of interest to the Agenda**

**Item 4 – General SEAC procedures**

**b) Report on SEAC-55 action points and written procedures**

***For information***

**Item 5 – Restrictions**

**5.1 General restriction issues**

3. Status update from Working Group on qualitative assessments



**For information and discussion  
SEAC/56/2022/01**

4. Updated RAC and SEAC Working procedures on restrictions

**For information and agreement  
SEAC/56/2022/02**

## **5.2 Restriction Annex XV dossiers**

### **c) Conformity check and key issues discussion**

- 1) Medium-chain chlorinated paraffins (MCCP) and other substances that contain chloroalkanes with carbon chain lengths within the range from C14 to C17**

**For discussion and agreement**

### **d) Opinion development**

- 1) Terphenyl, hydrogenated – First draft opinion**
- 2) *N,N*-dimethylacetamide and 1-ethylpyrrolidin-2-one – First draft opinion**
- 3) Per- and polyfluoroalkyl substances (PFAS) in fire-fighting foams – Second draft opinion**

**For discussion**

- 4) Substances containing polycyclic aromatic hydrocarbons (PAHs) in clay targets for shooting – Second draft opinion**

**For agreement**

- 5) Lead and its compounds in ammunition and fishing tackles – State of play of third-party consultation on SEAC draft opinion**

**For information**

- 6) 2,4-dinitrotoluene – Final draft opinion**

**For adoption**

## **5.3 Appointment of (co-)rapporteurs for restriction dossiers**

**For information**

## **Item 6 – Authorisation**

### **6.1 General authorisation issues**

- e) Update on incoming/future applications
- f) Update of technical guidance for rapporteurs
- g) Discussion on SAGA
- h) Discussion on economic feasibility

**For information**

### **6.4 Authorisation applications**

d) Discussion on key issues

14 applications for authorisation (chromium (VI) substances) and 1 review report (diglyme) from May and August 2022 submission windows

***For discussion***

e) Agreement on draft opinion

8. 253\_CT\_GEA-Westfalia (1 use)
9. 254\_CT\_Ratier-Figeac (2 uses)
10. 255\_CT\_Chrom-Mueller (3 uses)
11. 256\_CT\_KaVo-Dental (1 use)
12. 257\_CT\_Qualipac (1 use)
13. 258\_CT\_Schulte (2 uses)
14. 259\_CT\_ST-SRL (1 use)

***For discussion and agreement***

f) Adoption of opinion

3. 231\_CT\_Kesseboehmer (1 use)
4. 241\_CT\_Gessi (1 use)

***For discussion and adoption***

## **6.5 Appointment of (co-)rapporteurs for authorisation applications (closed session)**

***SEAC/56/2022/03***

***Restricted room document***

***For agreement***

### **Item 7 – Article 77(3)(c) requests**

None

### **Item 8 – AOB**

a) Update of the work plan

***For information***

### **Item 9 – Action points and main conclusions of SEAC-56**

Table with Conclusions and Action points from SEAC-56

***For adoption***

## 1. Minority Position CT\_Qualipac (Use ID: 0257-01)

In this minority position I will focus on issues that are currently covered under the remit of SEAC. I will therefore not focus on the essentiality of the use applied for, which can be considered purely decorative.

When it comes to the evaluation of the AoA, SEAC is expected to answer the following two questions:

1. Has the applicant demonstrated that there are no alternatives with the same function and similar level of performance that are technically and/or economically feasible for the applicant by the date of adoption of the opinion?
2. Is there information available in the application for authorisation or the comments submitted by interested third parties in the consultation indicating that there are alternatives available that are technically and economically feasible in the EU?

The applicant identified the following key product performance requirements: Aesthetics, adhesion, thermal/chemical/mechanical resistance. According to my assessment the applicant has not sufficiently justified the importance of all requirements for the use applied for. While it is clear that aesthetics is the most important requirement for this decorative use, it is entirely unclear why high performance is required for adhesion, thermal/chemical/mechanical resistance. Since product performance requirements are key in delineating the scope of the alternatives, this deficiency undermines the credibility of the analysis of alternatives provided by the applicant.

Further to that, there is clear information available to SEAC that alternatives are available in general for the use applied for. Some indicative examples:

1. Saxonia Galvanik GmbH has recently submitted information that is extremely relevant for the use applied for ("plate on plastic", including Polypropylene PP). I refer to the third party consultations for CT\_Cristina, CT\_Paffoni or CT\_Rubinetterie3M. Saxonia also has a dedicated web page to Cr(VI)-free processes ([click](#)) as well as a "status quo" document ([click](#)).
2. Avanzare Innovacion Tecnologica received funding in 2018 for the project "*Chrome plating without toxic Cr(VI): An ecofriendly electroplating for automotive plastic parts*" ([click](#)).

Reference 1 and 2 above are a clear and specific indication that alternative technologies to Cr(VI)-etching have advanced considerably and most likely also moved beyond what is discussed in the application from Qualipac.

Reference 1 is of particular interest since it suggests that "*there are alternatives available that are technically and economically feasible in the EU*". It also strongly suggests that the applicant's AoA is not an exhaustive and/or sufficiently detailed assessment of all potential alternatives.

More generally, plating technology (with or without a pre-treatment step) has advanced considerably since the "Chemservice" application (formerly CTAC) submitted in 2015. In my view the current application does not sufficiently reflect this reality.

Based on all of the above, it is in my view clear that the applicant has NOT "*demonstrated that there are no alternatives with the same function and similar level of performance that are technically and/or economically feasible for the applicant by the date of adoption of the opinion*".

As such I cannot agree with the opinion as adopted by SEAC during the September 2022 plenary meeting.

Simon Cogen  
SEAC Member