

Evaluation of Substitution Plans – how is it done?

Following the request from the European Commission, on 5 October 2020 the Committee for Socio-economic Analysis (SEAC) was asked to prepare an assessment of credibility and completeness of the Substitution Plans¹ of 12 applications for authorisation. SEAC will assess only the additional information submitted as the Substitution Plans. These assessments would be linked as “addenda” into the relevant opinions.

Deadlines to submit substitution plans

Relevant submission deadlines are the following:

Substance	Applicant(s)	Use applied for	Submission in 2020
“Batch 1”			
Chromium trioxide	Hapoc GmbH & Co KG ('Hapoc 1')	Surface treatment	10 September
Chromium trioxide	Chemservice GmbH (and co-applicants)	Surface treatment	24 September
Chromium trioxide	REACHLaw Ltd	Surface treatment	24 September
MOCA	REACHLaw Ltd	Curing agent	10 October
“Batch 2”			
Chromium trioxide	Hapoc GmbH & Co KG ('Hapoc 2')	Surface treatment	10 September
DEHP	DEZA a.s.	Plasticizing	6 November
Sodium dichromate	ILARIO ORMEZZANO - SAI s.r.l.	Wool dyeing	10 November
Chromium trioxide	Gerhardi Kunststofftechnik GmbH	Surface treatment	6 November
Chromium trioxide	Schell GmbH & Co. KG Armaturentechnologie	Surface treatment	8 December
Chromium trioxide	Aloys F. Dornbracht GmbH & Co.KG	Surface treatment	8 December
Chromium trioxide	Ideal Standard - Vidima AD (and co-applicant)	Surface treatment	8 December
Chromium trioxide	KEUCO GmbH & Co KG	Surface treatment	8 December

Note: If several applicants the name of the submitting applicant is given.

If necessary, the Committee for Risk Assessment (RAC) may be requested to provide technical and scientific advice to SEAC in terms of the risks of alternatives.

Timelines for SEAC's assessment

The following main activities will take place:

- SEAC workshop on Substitution Plans 6 November 2020

¹ If no substitution plan is submitted, SEAC will carry out a technical evaluation of the justification that there are no suitable alternatives available in general.

- Discussion and finalisation on the format of the addendum to the opinion during SEAC-49 in November/December 2020

“First batch” of Substitution Plans (October 2020-June 2021)

- Consultation on the “First batch” the Substitution plans from 21 October to 18 November 2020
- Applicants’ possible responses to comments from 25 November to 9 December 2020
- Discussion and agreement on draft addenda to the opinions on the “First batch” of the Substitution Plans during SEAC-50 plenary meeting in March 2021
- The applicants have four weeks to give possible comments on the draft addenda from late March to late April (exact dates to be decided)
- If the applicant does not comment the draft becomes final and is sent to the Commission as is
- If the applicant comments on the draft addendum to the opinions of the “First batch” the final version will be adopted in SEAC-51 plenary meeting in June 2021.

“Second batch” of Substitution Plans (December 2020-September 2021)

- Consultation on the “Second batch” of Substitution plans from 16 December 2020 to 27 January 2021 (extended by two weeks due to the holiday period)
- Applicants’ possible responses to comments 3-17 February 2020
- Discussion and agreement on draft addenda to the opinions on the second batch of the received Substitution Plans during SEAC-51 plenary meeting in June 2021.
- Discussion and adoption of the final addenda to the opinions on the first batch in SEAC-51 plenary meeting in June 2021
- The applicants have four weeks to give possible comments on the draft addenda from late June to late July (exact dates to be decided)
- If the applicant does not comment the draft becomes final and is sent to the Commission as is
- If the applicant comments on the draft addendum to the opinions on the “Second batch” the final version will be adopted in SEAC-52 plenary meeting in September 2021