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**STEFANOVA Desislava (ENTR)**

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**From:** GIRAL-ROEBLING Anne (ENTR)  
**Sent:** 07 June 2013 08:45  
**To:** [REDACTED]  
**Cc:** KIVELA Kalle (ECHA); DUBOURG Richard (ECHA)  
**Subject:** ED-SE aspects  
**Attachments:** Questionnaire\_cost of application\_final.docx

Dear [REDACTED]

You will find attached the questionnaire that our colleagues from ECHA prepared and sent to some potential applicants.

As discussed during our meeting, any data in relation of the SE impact removing a threshold could have is welcome. When ready, you can also send your analysis to ECHA (Kalle and Richard in cc) as it might be useful for them in the frame of their study.

Best regards,  
Anne

Anne Giral-Roebling  
Policy Officer



European Commission  
DG Enterprise and Industry  
REACH Unit - ENTR/F1

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Quantitative figures are better than qualitative responses, if possible, even if they're very uncertain

## Respondent number x

Note costs of preparing registration dossiers should not be included in these cost estimates				
'Basic'/background information				
Is your substance a threshold substance?:	(Y/N)	SEA (to be) prepared?:	(Y/N)	Are you in a consortium?: (Y/N)
What review period do you expect to receive?: (Years)		Average annual quantity of substance use over the authorisation period: (Specify units)		Substance cost: (Per unit)
Start date for cost calculations:	Xx/yy/zzzz	Current date:	Xx/yy/zzzz	End date for cost calculations: Xx/yy/zzzz
Comments:				

**Comment [DR1]:** If you are in a consortium, please report data relating to your own company only

**Comment [DR2]:** If you are working on an assumption that you might receive a particular review period, or a review period of at least so many years, please state it here

**Comment [DR3]:** Please give an indication of the cost (price) of the substance paid by your company

**Comment [DR4]:** Please if possible provide costings up to some future date which is relevant to you – an appropriate date might be the date by which you expect to have the authorisation granted

This is designed to give us an idea of the costs you might expect to incur after the application is submitted

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Direct monetary costs, expenses, fees etc		Note costs of preparing registration dossiers should not be included in these cost estimates				
Cost type	Incurred so far (value)	Not yet incurred but expected in reporting period (value)	Total across reporting period (value)	Proportion (%)	No quantified estimates (X)	Significance/size of cost type (1=small, 5=large)
Total direct monetary costs						
Application fees						
Consultancy fees						
Legal fees						
Hotels, travel, subsistence etc						
Others (please specify)						
Add lines as necessary						
If a SEA is being prepared, what proportion of these costs would be accounted for by SEA-related activities? (Or: how much lower would these costs be if no SEA had been prepared?) (%)						
Comments:						

**Comment [DR6]:** If you only have a total cost figure, you might wish to provide it in this table and estimate here the proportions attributable to each category. If you give monetary cost estimates for each category, we do not expect you to fill out the proportions column too.

**Comment [DR5]:** Please give a range rather than exact figures if that would be easier

**Comment [DR7]:** If you think you have incurred or will incur these costs, but are not able to provide monetary estimates, please indicate that here

**Comment [DR8]:** If you think you have incurred or will incur these costs, but are not able to provide monetary estimates, please try and give an idea of their relative size here. We are trying to get an indication of how big they are relative to other types of cost, and relative to total costs, incurred in the application.

**Comment [DR9]:** If you only have total cost figures, you might wish to give it here and estimate the proportions attributable to each category

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Indirect resource costs				
<i>These are likely to be more difficult to estimate. One way would be to estimate the numbers of individuals employed on the application in FTE terms, or the number of person-months. Time of staff involved in the application might be estimated also in terms of numbers of meetings, average number attending, average length of meeting etc. Staff involved periodically might be estimated in terms of 'projects', e.g. numbers of projects, average length and average number of staff. Do not double count (e.g. staff counted as FTEs and calculated separately on projects/meetings). Time estimates can be converted into a monetary cost using a representative staff cost (e.g. £1000/day). Daily/hourly rates should include business overheads, employers' tax contributions etc. If the costs are reported directly in monetary terms, there is no need to provide the representative staff cost.</i>				
Cost type	Incurred so far (units, e.g. FTEs, person-months)	Not yet incurred but expected in reporting period (units)	No quantified estimates (Y/N)	Significance/size of cost type (1=small, 5=large)
Staff employed on application project				
Meetings/time of other internal staff				
Meetings/time of external staff				
Add lines as necessary				
If a SEA is being prepared, what proportion of these costs would be accounted for by SEA-related activities? (Or: how much lower would these costs be if no SEA had been prepared?) (%)			Representative staff cost (Specify units)	
Comments:				

**Comment [DR10]:** Please report only costs incurred in relation to the activities of your own company. (This could include your share of costs incurred jointly with other companies via, e.g., a consortium.)

**Comment [DR11]:** If you think you have incurred or will incur these costs, but are not able to provide monetary estimates, please indicate that here

**Comment [DR12]:** If you think you have incurred or will incur these costs, but are not able to provide monetary estimates, please try and give an idea of their relative size here. We are trying to get an indication of how big they are relative to other types of cost, and relative to total costs, incurred in the application.

**Comment [DR13]:** Remember to account for staff involved in activities such as undertaking studies or supplying information which will be used in the application

**Comment [DR14]:** This could include, for instance, time of staff consulted with in the course of researching your supply chain

**Comment [DR15]:** If reporting figures in manpower terms, please here provide a representative approximate staff cost in hourly, daily etc terms, including employer taxes, overhead charges etc as appropriate

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‘Intangible’ or ‘knock-on’ costs					We realise that these costs are extremely uncertain, speculative and difficult to quantify/value, so we do not necessarily expect you to have any information to provide here. However, if you have considered these costs as part of your application process, please try and describe that here	
Cost type	Incurring so far (units)	Not yet incurred but expected in reporting period (units)	No quantified estimates (Y/N)	Significance/size of cost type (1=small, 5=large)	Comments	
Reputation/brand image etc					<b>Comment [DR16]:</b> If you think you have incurred or will incur these costs, but are not able to provide monetary estimates, please indicate that here	
Business risk					<b>Comment [DR17]:</b> If you think you have incurred or will incur these costs, but are not able to provide monetary estimates, please try and give an idea of their relative size here. We are trying to get an indication of how big they are relative to other types of cost, and relative to total costs, incurred in the application.	
Additional R&D					<b>Comment [DR18]:</b> If you think that being seen to use and apply to continue to use hazardous chemicals could have an impact on your company reputation or brand image, please describe that here	
Costs of finance/investment					<b>Comment [DR19]:</b> Business risk might result from uncertainty in the application process and the associated risk that the application is rejected	
Others (please specify)					<b>Comment [DR20]:</b> If your company has undertaken additional R&D as a result of the authorisation process, please describe that here. Do not double count additional R&D costs with resources spent on undertaking an analysis of alternatives	
Add lines as necessary					<b>Comment [DR21]:</b> If you think that using an Annex XIV substance has increased the costs of finance/investment faced by your company (e.g. due to greater business uncertainty and risk), please describe that here	
If a SEA is being prepared, what proportion of these costs would be accounted for by SEA-related activities? (Or: how much lower would these costs be if no SEA had been prepared?) (%)						
Comments:						

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Savings and benefits					
Industrial process efficiencies might result from scrutiny of processes associated with the search for alternatives. Management process savings might be associated with using application-related activities to achieve other objectives at the same time. Market intelligence benefits might result from increased supply chain communication.					
Type	Value so far (units)	Expected future value per year (units)	No quantified estimates (Y/N)	Significance/size of benefit type (1=small, 5=large)	Comments
Industrial process efficiency					
Management process savings					
Market intelligence/research					
Others (please specify)					
Add lines as necessary					
If a SEA is being prepared, what proportion of these benefits would be accounted for by SEA-related activities? (Or: how much lower would these benefits be if no SEA had been prepared?) (%)					
Comments:					

**Comment [DR22]:** If you think you have experienced or will experience these benefits, but are not able to provide monetary estimates, please indicate that here

**Comment [DR23]:** If you think you have experienced or will experience these benefits, but are not able to provide monetary estimates, please try and give an idea of their relative size here. We are trying to get an indication of how big they are relative to other types of cost (and benefit), and relative to total costs, incurred in the application.

**Comment [DR24]:** Through searching for alternatives, attempting to reduce your use of the Annex XIV substance, and ensuring minimisation of exposures, you might have uncovered efficiencies in industrial and other processes which could generate savings. If so, please describe that here.

**Comment [DR25]:** In the course of preparing the application, you might have been able to secure economies in undertaking other business activities (e.g. site visits, meetings etc arranged for application reasons but also used for other purposes. If so, please describe that here.

**Comment [DR26]:** If you think that, in the course of researching your supply chain, you have experienced benefits in terms of, e.g., market research or improved market intelligence, please describe that here