

IPEN Statement on Essential Uses
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IPEN supports the suggestion of the Switzerland and Norway language of “permitted uses.”

The topic of permitted use is really a discussion about alternatives.

Alternatives need to be available, technically feasible, accessible and efficient.

Commercial availability of an alternative is an important indicator of technical feasibility.

Identification and evaluation of alternatives should focus on function equivalent; this opens up possibilities for alternative practices; non-chemical alternatives and best practices.

Costs

Any assessment of availability and accessibility should investigate not only the current market situation, but also whether future availability and accessibility will remain the same; this often takes the form of price changing as economy of scale changes.

While the overall impact on society of switching from a chemical in use to an alternative may be economically beneficial or neutral, some variation in individual impacts is likely, with some stakeholders experiencing positive, and others negative, economic impacts.

It is important for all relevant impacts identified to be included, if not quantitatively then at least qualitatively. There should be no bias towards impacts that are quantitatively described simply because of the quantification (as impacts that cannot be described quantitatively may be of equal or greater importance).