

#23



COMPLETE

Collector: Nano Consult - Non-Industry (Web Link)

Started:

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PAGE 2: Section I - Identification

Q1: Please provide the following details (*compulsory):

Your name:	Palle Larsen
Name of organisation* (if applicable):	Fagligt Fælles Forbund
Town/City:	1790 København V
Country*:	Denmark
E-mail address:	
Transparency Register ID number (if applicable):	Fagli1213386683

Q2: Please indicate if you are responding to this questionnaire on behalf of/as:

d) a consumer organisation/trade union/environmental organisation/non-governmental organisation

Q3: Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution:

My contribution may be published under the name indicated

Q4: We might need to contact you to clarify some of your answers. Please state your preference below:

I am available to be contacted

PAGE 3: Section III – Problem definition and objectives

Q5: Please rate the importance of the following objectives on a scale between 1 (not important at all) and 5 (very important).

- | | |
|--|---|
| a) Provide decision makers, regulatory authorities and professional users with information that allows for an appropriate response to health or environmental risks of nanomaterials | 5 |
| b) Provide consumers with relevant information on products containing nanomaterials on the market | 5 |
| c) Maintain competitiveness and innovation of businesses bringing nanomaterials or products containing nanomaterials to the market (including SMEs) | 3 |
| d) Ensure consumer trust in products containing nanomaterials | 5 |
| e) Ensure the availability of relevant information on the presence of nanomaterials or products containing nanomaterials on the market | 5 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 2 |
| g) Protect confidential business information | 2 |

Please provide additional comments

Improving the information on the professional use of NM and the protection of workers exposed to NM, should be the main aim of the nano register. The register can be a very useful tool to the main aim: "To make the use of NM secure and credible in all processes from cradle to grave, from producing the NM to processing it, to using it as consumer and to handle it as waste. The key words for a NM-register have to be: "Traceability, transparency and trust!"

Q6: To what degree (from 1 - not at all to 5 - fully) does the current legislative framework (including the REACH and CLP Regulations and product-specific legislation) and the currently available databases (including the JRC web platform, see http://ihcp.jrc.ec.europa.eu/our_databases/web-platform-on-nanomaterials) meet the following objectives?

- | | |
|--|---|
| a) Provide decision makers, regulatory authorities and professional users with information that allows for an appropriate response to health or environmental risks of nanomaterials | 2 |
| b) Provide consumers with relevant information on products containing nanomaterials on the market | 1 |
| c) Maintain competitiveness and innovation of businesses bringing nanomaterials or products containing nanomaterials to the market (including SMEs) | 1 |
| d) Ensure consumer trust in products containing nanomaterials | 1 |
| e) Ensure the availability of relevant information on the presence of nanomaterials or products containing nanomaterials on the market | 1 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 2 |
| g) Protect confidential business information | 2 |

Please provide additional comments

A nano register and the sharing of information on NM are in line with the CSR of modern industries and companies. Good OHS and strong competitiveness goes hand in hand. We need a stronger and more reliable regulation to the benefit of the companies, the workers and the consumers as well.

Q7: To what extent do you agree with the following statements from 1 (strongly disagree) to 5 (strongly agree):

a) The current level of available information on the presence of nanomaterials and products containing nanomaterials on the market is insufficient for an adequate response to health and environmental risks 5

b) The current level of available information on the presence of nanomaterials and products containing nanomaterials on the market is insufficient for informed consumer choice 5

c) The current level of available information on the presence of nanomaterials and products containing nanomaterials on the market is detrimental to consumer trust 5

d) The available information on the presence of nanomaterials and products containing nanomaterials on the market is presented in an incoherent or ineffective way 5

e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market 2

Please provide additional comments We need much more valid information of safe producing, processing and handling of NM, based on research.

PAGE 4: Section IV – Health and environmental aspects

Q8: With regard to health and environmental hazards and risks of specific nanomaterials/types of nanomaterials, please tick the relevant boxes:

I am aware of health and/or environmental hazards of specific nanomaterials/types of nanomaterials

I am not aware of any classified nanomaterials,

I am not aware of any DNELs/PNECs/OELs set for specific nanomaterials/types of nanomaterials

I am aware of significant exposure of workers/users/consumers to specific nanomaterials/types of nanomaterials

Please explain your responses (if any, please report the nanomaterials, the health and/or environmental hazards, any relevant classification, any DNELs/PNECs/OELs, any exposure and in which condition):
OELs etc. do not exist, yet. Potentially, exposure to NM is related to all kinds of NM. Particular attention should be made to nanotubes and fibers and other very harmful substances. It is very important that information of NM, takes its beginning on a more varied point of view.

Q9: With regard to the past and current use of nanomaterials (tick the relevant box):

I am not aware of any health and/or environmental incidents which have occurred

Q10: The establishment of an EU nanomaterial registry (tick the relevant box):

Would significantly contribute to reducing the health and/or environmental risks related to the use of nanomaterials

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If appropriate, please explain further:
There is a lot of uncertainty among employers, employees and consumers regarding safety use of NM at all stages of NM, from cradle to grave. This uncertainty can only be reduced or better, - totally removed by credible useful transparent information which a register may help to provide.

PAGE 5: Section V – Consumer trust

Q11: In case information on the presence of nanomaterials in specific products were made available, what impact do you think this would have on consumers? (Please tick all that would apply)

a) They would be more inclined to purchase those products

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b) They would try to avoid those products,

Please explain:
Lack of information causes fear. On the contrary, solid and validated information gives the consumer (private or professional) the chance to choose the product with the less harmful effect. On top of that, solid information gives the opportunity to install proper protective measures when needed.

Q12: Do you believe that the public availability of information on the presence of nanomaterials in products would be likely to...(choose one of the following answers)

a) generate trust among consumers and the broad public, and thus have a positive effect on the market for the concerned products

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Comments:
Without traceability, transparency and trust, rumours will accrue, which can be very devastating for companies. Consumers in general want to know, and have a right to know so they can make their own choices. Some will go for specific properties to specific jobs, some will avoid certain products and some will search for more information. Trustfully information will pay off in the long run.

PAGE 6: Section VI - Innovation and competitiveness

Q13: With regard to innovation, do you believe that information on nanomaterials and products containing nanomaterials that could be gathered in a nanomaterial registry would...(choose one of the following answers)

a) stimulate innovation (e.g. through increased consumer trust, increased awareness on nanomaterials)

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Comments:

Innovation is affected by demand. A demand for less harmful and solid information concerning safe use of NM, will stimulate innovation. A business case of the dynamics is the replacement of organic solvent based paints with water based paints. If consumers have faith to products which meets their demands, they will ask for more of this, and there will be a bigger market and the possibility of further innovation.

Q14: With regard to competitiveness of EU companies manufacturing nanomaterials or products containing nanomaterials, do you believe that information on nanomaterials and products containing nanomaterials that could be gathered in a nanomaterial registry would...(tick all that apply)

a) stimulate intra-EU competitiveness,

b) enhance the competitiveness of European companies against extra-EU companies

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Please explain

To maintain Competitiveness and innovation of businesses, it is most important to gain trust from workers and the consumers to the products produced. If this is obtained it will give the EU-companies an advantage not only within the EU, but also globally.

PAGE 7: Section VIII – Possible options and exemptions

Q15: What would be the added value of a notification per use (i.e. for each mixture/article) compared to a notification per substance? – Please consider the usefulness of the information for public authorities, downstream user companies, workers and consumers.

We are in favour of notification per use, as this approach gives the most detailed pool of information. Such information will motivate end-users to improve the level of protection of the consumers and workers. The main route for information about nano based products shall go down the stream, so the end-users themselves often have little knowledge about the content of nano. By this the task of the employer on the protection of workers becomes much easier.

It is necessary with registration of every use of NM, to protect the workers no matter if an employed is handling the NM or product once or several times. Industrial produced NM is still at its beginning, and there's still a lot of unanswered questions regarding to safe use and security. We still need knowledge about possible short term and long term hazards when working with NM in different processes

Q16: Which actors along the supply chain should be subject to notification requirements? (tick all that apply):

- a) Manufacturers of nanomaterials,
- b) Importers of nanomaterials,
- c) Downstream users (e.g. re-formulators, manufacturers of products containing nanomaterials)
- ,
- d) Distributors to professional users (e.g. wholesalers)
- ,
- e) Distributors to consumers (e.g. retailers),

Please explain:
 Manufacturers (a) and importers (b) and the re-formulators etc. (c) are the key informants as they know more about the NM content. Distributors may be considered to notify too.

Q17: The following should be subject to notification requirements (tick all that apply):

- a) Substances,
- b) Mixtures containing nanomaterials,
- c) Articles with intended release of nanomaterials
- ,
- d) Articles containing nanomaterials without intended release
- ,

Please explain:
 Substances and NM mixtures are the key subjects to notification. Atticles with intended release of NM are important, as the intended release is part of the functionality of the article. Articles containing NM without intended release should be covered as well, in particular wiyh the respect to CNT and nono fibers as the fibers may be released due to accident or break down, and this may happen yeares after. A register shall comprehent any use of NM, ex. refining different products, coating, welding a.o.

Q18: Is there a need to exempt certain types of nanomaterials?

No, all kinds of nanomaterials should be subject to notification obligations

Q19: Is there a need to exempt certain uses of nanomaterials?

No, all uses of nanomaterials should be subject to notification obligations

Q20: If a Nanomaterials Observatory is established instead of an EU-wide registry, what type of information should be collected? (please tick all that apply)

- a) Information from existing notification systems,
- b) Information from market studies on nanomaterials and products containing nanomaterials
- ,
- c) Information on the use of nanomaterials across Europe
- ,
- d) Information concerning products containing nanomaterials
- ,
- e) Information on the hazards and risks of nanomaterials
- ,
- f) Other (please explain):
It is very important, not to say crucial, to have a register that contains description of different NM, there characteristics possible dangers and safe ways to handle the NM in processes from cradle to grave, from producing the NM, to processing it, to using it as consumer and to handle it as waste. A register also have as an obligation task to spread knowledge fast and reliable.

Q21: How should the information in a Nanomaterials Observatory be presented in order to reach the consumers, workers and authorities?

Governments, authorities, distributors, employers shall be made committed to obtain information from the Observatory and they shall be committed to ensure safe use of the NM, in order to achieve full protection for all parts involved in the production process as well as handling and use. Authorities shall have full acces to the information of the observatory to empower them to take proper action.

PAGE 9: Section X - Potential use and benefits of a nanomaterial registry

Q22: In what ways could the information on nanomaterials from registries be potentially useful (tick all that apply):

- a) Risk assessment and/or risk management,
- b) Enforcement of worker protection,
- c) Promotion of safe use of nanomaterials in products
- ,
- d) Development of strategies to ensure the safe use of nanomaterials
- ,
- e) Informed purchasing decisions by consumers,
- f) General education of the public,
- g) Other purposes (please specify)
Reliable and trustful information will provide advantages for the companies and will improve innovation as well. The companies doesn't have to spend big amounts for announcing their products, since the register already have provided the information needed.

Q23: Please give a justification for your views (presented in the previous question) and describe which data would be necessary to allow the desired use (e.g. would information on substances alone be enough for informed consumer purchase decisions, or would this require information for each concerned product):

The register shall be used to inform the NM users about the existence of NM, risks, opportunities for replacement and the necessary preventive measures on the specific NM and products containing NM.

Q24: What would be the added value of a European nanomaterial registry beyond the current framework of chemicals legislation, including REACH registration?

An overview of all NM at the market, better protection of the health of European Citizens and workers, more qualified decisions of professional users and consumers, a better balance between health and social responsibility of the NM producing, importing and distributing companies, support to the end-users, including employers and workers.

Q25: Please provide any other comments that you would like to share regarding transparency measures for nanomaterials on the market.

We suggest developing some kind of code-system, passing on information about the substance or mixture down the stream and allowing the end-user (employer, self-employed and workers) to install the proper measures of prevention. This will support employers (especially in SME's) and the protection of workers and consumers.

We once more will underline, that registration is not sufficient alone. Knowledge about NM shall be passed on as soon as possible.