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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:	
Name of organisation* (if applicable):	
Town/City:	
Country*:	Belgium
E-mail address:	
Transparency Register ID number (if applicable):	94948576873-32
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 but should be kept anonymous
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	4
c) Maintain competitiveness and innovation of businesses bringing nanomaterials or products containing nanomaterials to the market (including SMEs)	5
d) Ensure consumer trust in products containing nanomaterials	4
e) Ensure the availability of relevant information on the presence of nanomaterials or products containing nanomaterials on the market	4
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	5
g) Protect confidential business information	5
Please provide additional comments	The relevant information for the consumers is the hazards and safe handling of the products. Not only the information that the product contains nanomaterial.

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	3
b) Provide consumers with relevant information on products containing nanomaterials on the market	2
c) Maintain competitiveness and innovation of businesses bringing nanomaterials or products containing nanomaterials to the market (including SMEs)	4
d) Ensure consumer trust in products containing nanomaterials	2
e) Ensure the availability of relevant information on the presence of nanomaterials or products containing nanomaterials on the market	2
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	3
g) Protect confidential business information	4
Please provide additonal comments	It is less important to know about the presence of all nanomaterials in the products than to know about the related hazards and risks.

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	4
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	5

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 aware of 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): I am aware of the potential risks of nano titanium dioxide, nano silver, carbon nanotubes.
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 , If appropriate, please explain further: Knowledge of the presence of nanomaterials in a product may lead users to use them with extreme caution. It would therefore contribute to the reduction of exposure risk.

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)	d) They would search for more information, Please explain: This depends strongly on the reputation of nanomaterials.
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)	Comments: Perception is not as straightforward as a)b)c) would suggest. Nanomaterials cannot just be considered as a whole. This would depend on the category/type/use of nanomaterials (cosmetics/pharmaceuticals/food/surface coating, etc). Therefore all nanomaterials must be registered under REACH (annexes).

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)	b) have no significant impact on innovation, Comments: Any nanomaterial registry should be developed/monitored by ECHA under REACH
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)	c) have no significant impact on intra-EU competitiveness , f) hamper the competitiveness of European companies against extra-EU companies

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.

If mixtures affect the chemical properties/stability of nanomaterials, a notification per use would have an added value. The most important purpose of the notification is to trace the risks.

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)
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
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

PAGE 8: Section IX – Nanomaterials Observatory

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

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

In accessible and transparent language (not just chemical jargon)
Online in all EU languages.
Under ECHA supervision/management, classifying them by broad types of markets (cosmetics, food, electronics, sporting goods ...) and types of nanomaterials (titanium dioxide, nano silver, carbon nanotubes, nano silica ...)

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

,

f) General education of the public

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):

Respondent skipped this question

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

Currently REACH does not allow for a clear view of the penetration of nanomaterials and related risks. The revision of the annexes should help taking better account of nanomaterials. The added value of a nanomaterial registry under REACH/ECHA would be to provide an additional level of transparency and follow-up, i.e. an additional level of safety.

There is no added value if this registry is not linked to REACH/ECHA. It only creates more administrative burden.

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

Transparency measures for nanomaterials should be similar to those applying for all chemicals. If there are risks, the risks have to be managed by appropriate ways (restrictions, SDS, OHS legislation etc.)

Transparency of information on nanomaterials through REACH/ECHA is the best way to take precautionary principle into account whilst preserving competitiveness.