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COMPLETE

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PAGE 2: Section I - Identification

Q1: Please provide the following details (*compulsory):	
Your name:	Vivi Johansen
Name of organisation* (if applicable):	Danish Environmental Protection Agency
Town/City:	Copenhagen
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E-mail address:	
Q2: Please indicate if you are responding to this questionnaire on behalf of/as:	b) a public authority/public administration
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)	5
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.	5
g) Protect confidential business information	5

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	2
c) Maintain competitiveness and innovation of businesses bringing nanomaterials or products containing nanomaterials to the market (including SMEs)	Do not know
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.	Do not know
g) Protect confidential business information	5

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	1

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
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: We need more information on where the nanomaterials are, i.e. information on exposure. That information we can then combine and compare with what we continuously learn about the risks (and no risks) of nanomaterials and act accordingly with regard to risk reduction. In other words: gathering information on exposure to nanomaterials is a very important first step with regard to risk reduction.

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 , c) Their purchasing decisions would not be affected , d) They would search for more information, Please explain: It is mainly a question of consumer trust. Consumers need sufficient information to trust that nano products are safe – then they will buy them. Some products on the EU-market today already have labels saying “does not contain nano”. This kind of information generates mistrust with regard to nano. No information will not make such labels go away – nor will it eliminate mistrust. Information on the other hand – combined with information on the risks and safety of nano – is more likely to build consumer trust than no information.
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 , Comments: See the explanation under Section V, 1.

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)

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
,

c) have no significant impact on intra-EU competitiveness
,

d) have no significant impact on the competitiveness of European companies against extra-EU companies
,

Please explain
Ad a) Consumer mistrust is detrimental to a company's market possibilities whereas trust ensures that consumers continue to buy the company's products – or even buy more of the company's products. Ad b) The information that a company can show sceptic investors, insurers and buyers of the company's product about the contents and safety of a product may very well be decisive for the company's ability to stay in business.

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.

It would be useful to public authorities to get a clearer picture of the presence of nanomaterials in the products on the market and thus the actual exposure to workers, consumers and the environment with regard to nanomaterials. And it would be useful to downstream user companies and workers as well as consumers to know when they are dealing with a product that contain nanomaterials.

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,

Please explain:
Manufacturers and importers of nanoproducts are the subjects to the notification requirements to the Danish Nanoproduct Register. The Danish register is not a traceability register.

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

b) Mixtures containing nanomaterials,

c) Articles with intended release of nanomaterials
,

Please explain:
Products that release nanomaterials are subject to the notification requirements to the Danish Nanoproduct Register.

Q18: Is there a need to exempt certain types of nanomaterials?	Yes, certain types of nanomaterials should be exempted from a notification system , If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.) In order to avoid double registration obligations, nanomaterials that are registered elsewhere (e.g. in REACH or according to the cosmetics regulation) should be exempted. The important point is that the information is available somewhere in a register. Furthermore the same exemptions could apply as in REACH with regard to certain substances (e.g. REACH annex IV and V substances).
Q19: Is there a need to exempt certain uses of nanomaterials?	Yes, certain uses of nanomaterials should be exempted from a notification system , If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.) If it is possible to get the information from another EU-register, certain uses of nanomaterials should be exempted. If there is strict EU-legislation in place, which regulates the use of nanomaterials, these uses could also be exempted. These two examples of exemptions can be found in the Danish Nanoproduct Register. Finally The Danish Nanoproduct Register focuses on products where the nanomaterials are released. That is also an example of an exemption based on uses.

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
,

f) Other (please explain):
It is very important to note that if the option of a Nanomaterials Observatory is chosen, the protection of confidential business information may be a serious obstacle to the release of information from national notifications systems - and the same is problem with regard to the exchange of information between national notification systems.

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

See the comments under Section IX, 1.
Furthermore the main concern of consumers, workers and authorities is probably exposure to nano products and what is known about safety/risk of the products - so the Nanomaterials Observatory should focus on these two aspects.

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

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):

See the answer under Section IX, 2.

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

REACH only shows that nanomaterials (above 1 ton) are imported and produced in the EU – not where the nanomaterials are to be found in the products. However this in the main concern of the consumers.

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

Respondent skipped this question