

#48



COMPLETE

Collector: Nano Consult - Industry (Web Link)

Started:

Last Modified:

Time Spent:

IP Address:

PAGE 2: Section I - Identification

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

Organisation*:

Town/City:

Country*:

Germany

Contact name:

E-mail address:

Q2: 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

Q3: We might need to contact you to clarify some of your answers. Please state your preference below:

I am available to be contacted

Q4: Did your organisation participate in the online survey (undertaken by RPA/BiPRO for the European Commission in early 2014) on the administrative burden of the notification schemes?

Yes

PAGE 3: Section II - Organisation Information

Q5: Please indicate which of the following applies to you or your members (tick all that apply):

Respondent skipped this question

Q6: Please indicate the four-digit NACE code of your primary and secondary business sector (if applicable). If you require information regarding NACE codes, please visit the European Commission Competition webpage at http://ec.europa.eu/competition/mergers/cases/index/nace_all.html

Respondent skipped this question

Q7: Please indicate the number of employees.

Respondent skipped this question

Q8: Please indicate the approximate annual turnover of your organisation and the annual turnover which relates to nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials).

Respondent skipped this question

Q9: Please indicate the number of nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials) that you place on the national market.

Respondent skipped this question

Q10: Please indicate the number of nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials) that you place on the EU market.

Respondent skipped this question

Q11: Please indicate the number of nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials) that you place on the global market.

Respondent skipped this question

Q12: Please indicate the number of customers and, if applicable, number of suppliers for all your nano-related products combined (where these include nanomaterials as well as mixtures and articles containing nanomaterials).

Respondent skipped this question

PAGE 4: Section III – Problem definition and objectives

Q13: 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 | 3 |
| 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 | 2 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 5 |
| g) Protect confidential business information | 5 |

Q14: 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 | 5 |
| b) Provide consumers with relevant information on products containing nanomaterials on the market | 3 |
| 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 | 3 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 3 |
| g) Protect confidential business information | 4 |

Q15: 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 | 1 |
| 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 | 4 |
| c) The current level of available information on the presence of nanomaterials and products containing nanomaterials on the market is detrimental to consumer trust | 3 |
| d) The available information on the presence of nanomaterials and products containing nanomaterials on the market is presented in an incoherent or ineffective way | 2 |
| e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market | 5 |

<p>Q16: With regard to health and environmental hazards and risks of specific nanomaterials/types of nanomaterials, please tick the relevant boxes:</p>	<p>I am aware of health and/or environmental hazards of specific nanomaterials/types of nanomaterials</p>
	<p>,</p>
	<p>I am not aware of any classified nanomaterials,</p>
	<p>I am aware of DNELs/PNECs/OELs set for specific nanomaterials/types of nanomaterials</p>
	<p>,</p>
	<p>I am not aware of any significant exposure of workers/users/consumers to specific nanomaterials/types of nanomaterials</p>
<p>Q17: With regard to the past and current use of nanomaterials (tick the relevant box):</p>	<p>I am not aware of any health and/or environmental incidents which have occurred</p>
<p>Q18: The establishment of an EU nanomaterial registry (tick the relevant box):</p>	<p>Would not significantly contribute to reducing the health and/or environmental risks related to the use of nanomaterials</p>

PAGE 6: Section V – Consumer trust

<p>Q19: In case information on the presence of nanomaterials in your products were made available, what impact do you think this would have on your clients? (Please tick all that would apply)</p>	<p>c) Their purchasing decisions would not be affected</p>
<p>Q20: 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)</p>	<p>b) have no significant impact</p>

PAGE 7: Section VI - Innovation and competitiveness

<p>Q21: 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)</p>	<p>b) have no significant impact on innovation</p>
<p>Q22: 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)</p>	<p>e) hamper intra-EU competitiveness, f) hamper the competitiveness of European companies against extra-EU companies</p>

PAGE 8: Section VII – Possible impact of a registry on your company/members of your association

Q23: Overall, how would a possible obligation to notify nanomaterials at the EU level affect your company/the members of your association, assuming that no exemptions were to be made from 1 (no impact) to 5 (significant impact):

- | | |
|--|---|
| a) with respect to nanomaterials on their own | 5 |
| b) with respect to nanomaterials in mixtures | 5 |
| c) with respect to articles with intended release of the nanomaterials | 3 |
| d) with respect to articles containing nanomaterials in general (i.e. in case also articles without an intended release of nanomaterials were to be covered) | 4 |

Q24: Would disclosure of the notified information conflict with the confidentiality of business information?

Yes, there would be a conflict with business information confidentiality

Q25: Do you experience or expect any significant barriers for your company/members of your association from diverging registration obligations in the schemes in France/Belgium/Denmark?

Yes, we foresee significant barriers

Q26: Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?

No, there is not any significant difference in the national markets for our products

Q27: In case the European Commission were to recommend a best practice model for national notification schemes based on the experiences in France, Belgium and Denmark, which elements of these systems can be considered as “best practice”?

- use the same nanomaterial definition
- transmission of the notification numbers along the supply chain in order to minimize the burden for companies and protect confidential information
- consider as much as possible information as CBI in order not to hamper more competitiveness and innovation

PAGE 9: Section VIII – Possible options and exemptions

Q28: 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.

For workers and downstream users, the best information should be found in safety data sheets and is then related to a substance/mixture notification.
A substance notification (as practice under REACH and CLP) is a good start for a NM Observatory.
Use notifications are already existing in the food area, for cosmetics and for biocides.

Q29: Which actors along the supply chain should be subject to notification requirements? (tick all that apply):

Please explain:
Notification systems are already in place

Q30: The following should be subject to notification requirements (tick all that apply):

Respondent skipped this question

Q31: Is there a need to exempt certain types of nanomaterials?

Yes, certain types of nanomaterials should be exempted from a notification system

Q32: Is there a need to exempt certain uses of nanomaterials?

Yes, certain uses of nanomaterials should be exempted from a notification system

PAGE 10: Section IX – Nanomaterials Observatory

Q33: 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
- ,
- e) Information on the hazards and risks of nanomaterials

Q34: How should the information in a Nanomaterials Observatory be presented in order to reach the consumers, workers and authorities?

The REACH database and the work engaged by ECHA on Brief Profiles could be a good start. For consumers, market studies would be of greater values. For workers and authorities, more detailed information from ECHA dissemination would be useful.

PAGE 11: Section X - Potential use and benefits of a nanomaterial registry

Q35: In what ways could the information on nanomaterials from registries be potentially useful (tick all that apply):

- f) General education of the public

Q36: 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):

Henkel considers that the administrative burden, the risk of releasing confidential information and the negative impact on economy outweigh the potential positive impact of the scheme. Indeed, no benefit from the French scheme has been identified so far, at least from a consumer perspective

Q37: What would be the added value of a European nanomaterial registry beyond the current framework of chemicals legislation, including REACH registration?

No added value identified so far. Nanomaterials are not more dangerous as any other chemicals.

Q38: Please provide any other comments that you would like to share regarding transparency measures for nanomaterials on the market.

Respondent skipped this question