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PAGE 2: Section I - Identification

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

Organisation*:	"4 Japanese electric and electronic (E&E) industrial associations"; JEITA (Japan Electronics & Information Technology Industries Associa- tion) CIAJ (Communications and Information Network Association of Japan) JBMIA (Japan Business Machine and Information System Industries Association) JEMA (Japan Electrical Manufacturers' Association)
Town/City:	Tokyo
Country*:	Japan
Contact name:	Tsukasa Kimura (JEITA)
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 under the name indicated
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?	No

PAGE 3: Section II - Organisation Information

Q5: Please indicate which of the following applies to you or your members (tick all that apply):	f) is a manufacturer of articles containing nanomaterials without intended release , k) Not sure whether we deal with nanomaterials

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

Primary business sector (NACE 4 digit code):	C27 - Manufacture of electrical equipment

Q7: Please indicate the number of employees.	≥ 250 employees

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).	
Annual turnover	≥ €50m
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	1
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)	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	1
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	We do not consider that “being/containing nanomaterials” would mean “unacceptable risk exists”. About a), b) and e): There is no exposure from the electrical and electronic equipments (EEE), and therefore such information would not be important for EEE.

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	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
Please provide additonal comments	We consider current scheme under REACH and CLP is sufficient because there is no exposure from EEE.

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	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	1
d) The available information on the presence of nanomaterials and products containing nanomaterials on the market is presented in an incoherent or ineffective way	1
e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market	5

PAGE 5: Section IV – Health and environmental aspects

Q16: **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 aware of DNELs/PNECs/OELs set for specific nanomaterials/types of nanomaterials , I am not aware of any 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): We have never heard that there is significant risk of nanomaterials relating to the EEE.
Q17: **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 , Please explain (if any, please report the events and any scientific publication): We would like you show us such cases if any, because we are very interested in such safety-related information.
Q18: **The establishment of an EU nanomaterial registry (tick the relevant box):**	Would not significantly contribute to reducing the health and/or environmental risks related to the use of nanomaterials , If appropriate, please explain further: It would not significantly contribute, because the risk relating to EEE is inherently low.

PAGE 6: Section V – Consumer trust

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)**	c) Their purchasing decisions would not be affected
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)**	b) have no significant impact

PAGE 7: Section VI - Innovation and competitiveness

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)**	c) hamper innovation in the EU (e.g. through concerns about confidential business information or through additional costs related to providing information) , Comments: It would hamper innovation in research and development especially in medical and energy sectors.
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)**	c) have no significant impact on intra-EU competitiveness , f) hamper the competitiveness of European companies against extra-EU companies , Please explain Please see above VI-1.

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	5
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)	5
Please explain:	We are concerned about very significant impact, because the EEE industry would have to assess extremely enormous information from whole global supply chain to meet such obligations.

Q24: **Would disclosure of the notified information conflict with the confidentiality of business information?**	Yes, there would be a conflict with business information confidentiality , If yes, please elaborate; you may differentiate according to the different information that may be required in a notification scheme (e.g.: if a notification is only per substance and general use, or if the exact use needs to be disclosed): It depends on up-stream manufacturers of nanomaterials. We are downstream users and cannot rule out that there is risk of any conflict with business information confidentiality of such manufacturers.

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, If yes, please describe these barriers? In the first place, the notification obligations themselves would be a kind of trade barrier which may hamper innovation in research and development.
Q26: Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?	*Respondent skipped this question*

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"?

There is no "best practice", because the notification itself would be a trade barrier which may hamper innovation in research and development.

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 the EEE, there would be negative value only, because the notification itself would be a trade barrier which may hamper innovation in research and development though the information on nanomaterials is not important for EEE. (See our comments especially on III-1 above.)

Q29: Which actors along the supply chain should be subject to notification requirements? (tick all that apply):	Please explain: See our comments above.
Q30: The following should be subject to notification requirements (tick all that apply):	Please explain: We would like to know possible definitions of "registration" and "notification". If they would be similar to "registration" and "(annual) notification" under the current REACH scheme, we never consider that any notification requirements would be needed. Why such scheme would be necessary though "being/containing nanomaterials" does not mean "unacceptable risk exists"? We consider that even the registration would hamper innovation in research and development (see VI-1 above) and would not be necessary. Still less, the notification scheme is not needed, rather harmful for whole society.
Q31: Is there a need to exempt certain types of nanomaterials?	If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.) See our comments in VIII-3 above. We consider that the notification scheme would be useless.
Q32: Is there a need to exempt certain uses of nanomaterials?	If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.) See our comments in VIII-3 above. We consider that the notification scheme would be useless.

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

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

Please see our comments especially on III-1 and VII-2 above. In order to avoid misunderstanding, such information should not be open to the public as is.

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):

Respondent skipped this question

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):

As widely recognized, there are a huge number of scientific literatures/papers on nanomaterials and their advanced or entirely new valuable properties such as mechanical, physicochemical, electronic or electro-chemical properties and so on. For example, online search via Google Scholar shows about 674000 records for search term ”nanomaterials”, about
88400 records for search term "nanomaterials and medical" and about 449000 for search term "nanomaterials and energy".

These huge numbers of science papers reflect very active research and development activities in this field, also suggesting fierce competition among research institutes and/or firms.

Nano-registration scheme, if not designed properly, will be significant burden on these R&D activities and commercial introduction of their successful outcomes, and as a consequence, will harm significant social benefits from these R&Ds. Special consideration should be needed for the design of registration scheme to avoid unnecessary burden on whole society.

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

We consider current scheme under REACH and CLP is sufficient. For the EEE, there would be only negative value for registry beyond the current framework, because the notification itself would be a trade barrier which may hamper innovation in research and development though the information on nanomaterials are not important at all for functionality and/or environmental/human health relevance of EEE. (See our comments especially in III-1 and VI-1 above.)

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

Please see our comment provided in X-2 above.