

#59



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:

Town/City:

Country*:

FRANCE

E-mail address:

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

a) an individual

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	5
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	1
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.	3
g) Protect confidential business information	1
Please provide additional comments	La covigilence de tous les acteurs sur les impacts collectifs est plus importante pour moi que la relation clients fournisseurs, souvent déséquilibrée au profit du fabricant

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)	3
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	2
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	2
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 | 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 | 5 |
| e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market | 2 |

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 specific nanomaterials that are classified as hazardous under Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures

,

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):

En tout cas des tentatives Comme http://nanogenotox.eu/files/PDF/nanogenotox_web.pdf voir ici <http://www.nano-device.eu/index.php?id=329>

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

I am aware of health and/or environmental incidents which have occurred

,

Please explain (if any, please report the events and any scientific publication):
<https://www.anses.fr/sites/default/files/documents/AP2012sa0273Ra.pdf>
<http://veillenanos.fr/wakka.php?wiki=NanoAlimentationRisques>

Q10: 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:
Ce ne serait qu'une étape, c'est le traitement de ces informations en indicateurs pertinents de flux d'usage pour des populations sensibles et sur des territoires géographiques (en cohérence avec la circulation de l'eau / lieux d'utilisation et de rejets) qui deviendrait une aide aux décisions pour anticiper des problèmes et non pas intervenir après coup. Voir <http://veillenanos.fr/wakka.php?wiki=SeForgerUnAvis>

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)

b) They would try to avoid those products,

d) They would search for more information,

Please explain:

Un consommateur averti est toujours plus sélectif. Et la réaction dépendra du type d'information « flash » compréhensible sur des étiquettes. Voir <http://veillenanos.fr/wakka.php?wiki=EthiquetageNano>

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)

c) generate insecurity or stigmatise such products, and thus have a negative effect on the market for the concerned products

Comments:

je choisis à la fois a) et c) ! Cf remarques précédentes : certaines personnes trouveront plus simple de boycotter , dans le doute, d'autres se forgeront un avis sur la sécurité et seront plus avisés cf les pictogrammes proposés au Danemark <http://veillenanos.fr/wakka.php?wiki=EthiquetageNano> Une partie des consommateurs resteront sur une stratégie d'alternatives naturelles qui les rend plus autonomes et moins dépendants des laboratoires, en prise directe avec les ressources naturelles d'un territoire local... Des études sociologiques sur le pronostic des comportements de consommateurs ont été publiées, plus orientées vers les besoins des acteurs économiques pour lever les peurs des consommateurs que pour éduquer les acteurs politiques et économiques à la précaution et à la mise en œuvre des recommandations pour la sécurité de tous. <http://veillenanos.fr/wakka.php?wiki=EthiqueNanoEntretienSachaLoeveJuin2011> <http://veillenanos.fr/wakka.php?wiki=ConsultationsConsultingSondageNanoEuropeMai2011#Point2>

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)

Comments:

je choisis à la fois a) car cela obligerait à une innovation responsable et et c) car c'est le discours des industriels. En fait, pour exercer une vigilance tout au long d'une chaîne d'acteurs, on n'a pas besoin des informations confidentielles sur les processus de fabrication. On a juste besoin de savoir « présence ou absence » et en quelle quantité, afin de faire ensemble une traçabilité utile avec des modèles simples de prévision de flux au niveau collectif !!! il n'y a pas de confidentialité en jeu, puisque les industriels argumentent les bénéfices liés aux « nanos » dans leurs plaquettes commerciales et n'hésitent pas à s'autodéclarer dans des registres volontaires à usage commercial cf <https://www.nanothinking.com/nanotechmap> !!! La traçabilité peut aussi rendre service aux entreprises : l'innovation responsable c'est être en capacité de borner un marché en le ciblant là on peut en maîtriser les conséquences cf un fabricant de voitures en capacité de rappeler tous les véhicules construits à telle date dans telle usine pour vérifier les freins !

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)

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

,

Please explain

mais pour avoir un impact sur le pilotage des usages, il faudra étendre la RSE au niveau mondial Les négociations au sein de l'ISO devraient progressivement être imprégnées des exigences de la société civile pour avoir des standards mondiaux de traçabilité et de RSE ainsi que de surveillance collective des impacts (cycle de vie des produits)

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.

Respondent skipped this question

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)

,

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

,

d) Articles containing nanomaterials without intended release

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?

Au moment de l'usage individuel, ces deux propositions existent
<http://veillenanos.fr/wakka.php?wiki=EthiquetageNano>

<http://www2.mst.dk/udgiv/publications/2011/12/978-87-92779-11-3.pdf>

Sur les lieux de travail, plusieurs tentatives existent dont :
<http://www.inrs.fr/accueil/produits/mediatheque/doc/outils.html?refINRS=outil44>

Pour une vigilance proactive et collective anticipant les impacts sur la santé et l'environnement, il faut passer à une estimation des flux avec des modèles simples et robustes
Cf <http://veillenanos.fr/wakka.php?wiki=SeForgerUnAvis>

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):

besoin d'informations sur chaque produit concerné): cf propositions d'éthiquetage déjà citées

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

Cf rapport ANSES : p 84 <https://www.anses.fr/sites/default/files/documents/AP2012sa0273Ra.pdf>
en l'état, le règlement REACH n'est que très partiellement applicable aux nanomatériaux, notamment en raison des seuils de déclenchement élevés en quantité produite prévus par la procédure. Il est suggéré que ces seuils soient abaissés afin de tenir compte du caractère souvent encore peu massif de la production par entreprise des substances visées.

Et aussi <http://veillenanos.fr/wakka.php?wiki=NanoReach>
Et http://ciel.org/Publications/Nano_Reach_Study_Jan12.pdf

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

Respondent skipped this question