

#30



COMPLETE

Collector: Nano Consult - Non-Industry (Web Link)

Started:

Last Modified:

Time Spent:

IP Address:

PAGE 2: Section I - Identification

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

Your name:

Name of organisation* (if applicable):

Town/City:

Country*:

Bulgaria

E-mail address:

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

Other (please specify)
Business consulting 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 do not want 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. | 2 |
| g) Protect confidential business information | 1 |

Please provide additional comments

In the area of nano materials there are still a lot of studies to be done in order to ensure the impact of NM to the human health. Until there are no certain proves on the safety of use of these materials we have to provide all the necessary information to the consumer so that they to be able to make a choice, based on the pros and cons. There could not be a question of confidential information with this regard.

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	4
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)	5
d) Ensure consumer trust in products containing nanomaterials	Do not know
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	Do not know
Please provide additional comments	The cited source is difficult to understand and navigate. It is not very user friendly. E has to put more attention and resources on researching of the interaction of nanoparticles and biological systems and more information on the response of living organisms to the presence of nanoparticles of varying size, shape, chemical composition and surface characteristics, not the least on understanding and categorizing the toxicity of nanoparticles

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 4

e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market 2

Please provide additional comments

To summarize the answers of the above questions: there should be much more information on NM in the media starting from their potential in different areas of our live and together with the risks that we could be exposed to.

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 DNELs/PNECs/OELs set for 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):
The society and consumers needs more and easy to understand information on NM

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

Please explain (if any, please report the events and any scientific publication):
I am aware of the hazards of utilizing NM as well as a lot of the benefits of using them.

Q10: The establishment of an EU nanomaterial registry (tick the relevant box):

I do not know,

If appropriate, please explain further:
Informed and active society is more relevant than another register that will increase the expenditures for new administration structure. EU needs more awareness raising and public-private partnerships for tackling issues.

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:

They will be informed and able to take their own decision.

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:

The above question exclude the possibility of giving consumers right to have informed choice. When it comes to possible serious health issues questions about positive or negative effects on markets are insignificant and irrelevant.

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:

The questions are not correct! Yes, NM could stimulate innovation, but there is no any correlation between consumers' trust and establishing another register in order to stimulate innovation.

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)

Please explain

As already stated a register does not seams to be the only and worthy solution for promotion of NM.

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.

When it comes to health care applications and Food&Beverages notification per use should be necessary. For products that do not imply introducing nano particles into the human body, food or medicine such a notification would be not necessary.

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),

Please explain:
When it comes to health care applications and Food&Beverages and all the other products that introduce nano particles into the human or animal body by any means.

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

- a) Substances,
- b) Mixtures containing nanomaterials

Q18: Is there a need to exempt certain types of nanomaterials?

No, all kinds of nanomaterials should be subject to notification obligations

,

If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.)
All the nano materials and/or their utilization have to be a subject of notification and proof that they are not hazardous to the nature.

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?

If an observatory or any other structure is going to be established it has to be open, based on public-private partnership and has to cover all the countries of EU. It has to be based both on project based and voluntary participation.

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
- ,
- e) Informed purchasing decisions by consumers

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):

NM is an area that seems to be of a great perspective for creating new products, technologies, business. However it has been not studied well in terms of possible hazards to the environment and health. It has to be treated similarly as NGOs and has to be a matter of each EU country decision whether to allow and where to allow the use of NMs.

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

Informed consumers' decision.

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

The Register or Observatory or whichever other tool that will have to be established has to be oriented towards more research and transparency on the benefits and hazards that NM imply. These structures has to be independent of political and business influence.