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**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:	DUJARDIN Gérald
Name of organisation* (if applicable):	Collectif citoyen Nanotechnologies du Plateau de Saclay
Town/City:	Orsay
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 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)                                  | 4 |
| 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   | 3 |

Please provide additional comments

Il est indispensable de s'assurer que les produits commercialisés sont sans danger pour les consommateurs, les travailleurs et l'environnement. Il est nécessaire que les autorités sanitaires, les associations de consommateurs et les consommateurs qui le souhaitent puissent identifier les produits contenant des nanomatériaux : l'étiquetage ainsi que la création d'un registre européen accessible à tous sont deux éléments indispensables pour parvenir à cette identification des produits concernés. Notre réponse à cette question et aux suivantes reprend à son compte la réponse que vous a adressée AVICENN, association à la quelle notre association CNanoS (cf. <http://www.collectif-nanosaclay.fr>) est membre associée. (cf. <http://avicenn.fr/wakka.php?wiki=MembresAssocies>).

**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](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)	2
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	1
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	2
g) Protect confidential business information	Do not know
Please provide additional comments	Nous approuvons le commentaire fait par Avicenn pour cette question.

**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	4
e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market	4
Please provide additional comments	Nous approuvons le commentaire fait par Avicenn pour cette question.

**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

,

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):

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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):

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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:

Nous ne recopions pas le commentaire fait par Avicenn à cette question mais l'approuvons.

**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:

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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)**

b) have no significant impact,

Comments:

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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)

,

Comments:

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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

,

Please explain

Nous approuvons le commentaire fait par Avicenn pour cette question.

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.**

Nous approuvons le commentaire fait par Avicenn pour cette 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)

,

d) Distributors to professional users (e.g. wholesalers)

,

e) Distributors to consumers (e.g. retailers),

Please explain:

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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

,

Please explain:

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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?**

If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.)  
 Nous approuvons le commentaire fait par Avicenn pour cette question.

**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?**

Nous approuvons le commentaire fait par Avicenn pour cette question.

**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,
  - g) Other purposes (please specify)
- Nous approuvons le commentaire fait par Avicenn pour cette question.

**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):**

Nous approuvons le commentaire fait par Avicenn pour cette question.

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

Nous approuvons le commentaire fait par Avicenn pour cette question.

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

Nous approuvons le commentaire fait par Avicenn pour cette question.