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COMPLETE

Collector: Nano Consult - Non-Industry (Web Link)
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PAGE 2: Section I - Identification

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

Your name:	Michael Jorgensen
Name of organisation* (if applicable):	CO-industi
Town/City:	Copenhagen
Country*:	Denmark
E-mail address:	

Q2: Please indicate if you are responding to this questionnaire on behalf of/as:	d) a consumer organisation/trade union/environmental organisation/non-governmental organisation
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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
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Q4: We might need to contact you to clarify some of your answers. Please state your preference below:	I am available to be contacted
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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	4
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	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.	2
g) Protect confidential business information	3

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	1
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	2

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 | 5 |
| e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market | 3 |

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 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):
 OELs don't exist yet. Attention should particularly be made to nanotubes and -fibers and other likewise harmful substances. All kind of exposure is related to nanomaterials

Q9: 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

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

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)

a) They would be more inclined to purchase those products

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)

a) generate trust among consumers and the broad public, and thus have a positive effect on the market for the concerned products

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)

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

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.

We're in favour of notification per use as this approach gives the most detailed pool of information. Such information will motivate endusers to improve the level of protection of consumers and workers. The main information on nano-based products should be going downstream, as the endusers often have little knowledge about the content of nano. This "flow" of information will make the task of protecting the workers easier.

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)

Q17: The following should be subject to notification requirements (tick all that apply):	<div> a) Substances,</div> <div> b) Mixtures containing nanomaterials,</div> <div> c) Articles with intended release of nanomaterials</div> <div> ,</div> <div> d) Articles containing nanomaterials without intended release</div>
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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)	<div> a) Information from existing notification systems,</div> <div> b) Information from market studies on nanomaterials and products containing nanomaterials</div> <div> ,</div> <div> c) Information on the use of nanomaterials across Europe</div> <div> ,</div> <div> d) Information concerning products containing nanomaterials</div> <div> ,</div> <div> e) Information on the hazards and risks of nanomaterials</div>
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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):	<div> a) Risk assessment and/or risk management,</div> <div> b) Enforcement of worker protection,</div> <div> c) Promotion of safe use of nanomaterials in products</div> <div> ,</div> <div> d) Development of strategies to ensure the safe use of nanomaterials</div> <div> ,</div> <div> e) Informed purchasing decisions by consumers</div>
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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):

The register shall be used to inform the nanomaterial users of the existence risk opportunities for replacement and what the necessary preventive action or measures according to specific nanomaterials and/or products containing nanomaterial

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

An overview of all the nanomaterials/product at the market, better protection of the health and safety of workers and citizens, better decisions by professional users and consumers, a better balance between Health and social responsibility of the producers, importers and distributors

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

Supporting SMEs and their struggle for keeping up ensuring a healthy and safe working environment