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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):

Country*:	France
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Q2: Please indicate if you are responding to this questionnaire on behalf of/as:	a) an individual
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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	4
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)	1
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.	1
g) Protect confidential business information	1

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 | 3 |
| 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 | 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. | Do not know |
| g) Protect confidential business information | Do not know |

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

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):

Why is this consultation only available in english ? It is difficult to respond to questions using acronyms in a foreign language.

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

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Please explain (if any, please report the events and any scientific publication):
the nanomaterial pollution of the environment being diffuse (and mixed with so much other sources of silent pollutions), and the impact on human and animal health of specific nanomaterials being not known and probably long term, it is very difficult to establish a direct link between a specific incident and un specific nanomaterial. This creates a increasing gap between the consumers, not informed of the presence neither of the consequences, and the nanomaterial industry, which can hide under the fact that nonamaterials are now widely spread in the environment and that their origin can not be linked specifically to any of them, and that it it impossible to remove them from the environment either... As usual, any delay taken to alert the consumer serves the economy, never the human being.

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

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If appropriate, please explain further:
always rececting the responsibility on the consumer is now known as the best way not to do anything. It is an abnormality (and soon a scandal) to authorise nanomaterials in clothes, cosmetic products, alimentation (or any other goods that can be producted without) ... when you know (or worse, when you don't know) the effects of it.

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

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

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Comments:
the insecurity and doubts over the purposes of the industry (for not giving this information) is greater now as the consumers have no information and no choice.

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)

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Comments:
it would stimulate the innovation to find alternatives to nanomatérials

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

,

c) have no significant impact on intra-EU competitiveness

,

Please explain
the security of the consumer being better if Europe if a real regulation of nanomaterial use occurs rapidly could be a good thing for the european economy, boosting exportations to states having a lower level of inocuity of their production, when the consumers research geater garanties. Remember the scandal of the melanine in milk killing chinese babies and the consumers turning to european baby milkpowder, seen as more secure...

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.

I dont'see what the use of an "annual" notification could be, wether per use or per substance. Information of the presence of nanomaterials should be directly available on the product for the consumer without any research, not on a specialised website.

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):

a) Substances,

b) Mixtures containing nanomaterials,

c) Articles with intended release of nanomaterials

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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)

f) Other (please explain):
an observatory is the best way not to do anything concret to protect the consumer . And what for the people who refuse to use nanomaterials but "benefits" of the widespread nanomaterial pollution in the environnement that has been "decided" by others who thought that it was a "reasonable choice" to do ? Remenber asbestos ?

Q21: How should the information in a Nanomaterials Observatory be presented in order to reach the consumers, workers and authorities?

it should be directly on the product.

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,
- e) Informed purchasing decisions by consumers,
- f) General education of the public,
- g) Other purposes (please specify)
you can't do a real public consultation on nanomaterial if you start with the postulate that, whatever the result, it should be compatible with a development of industrial use of nanotechnology.

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 most important is to educate people to the fact that it accumulates in the bodies and the environment and that the theory of "direct and certain damage" rule is totally inappropriate to nanomaterials (as it is for endocrine disruptors and other diffuse pollutions)

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

it should aim at informing the consumers (or not consumers...) completely, with a large availability of the information, and the same information for the industry and the consumer (or, again, the not consumer), taking into account the "cocktail" effect, the no-threshold effect of these substances not the dose effect.

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

the availability of the "public" consultation, and its results, in all EU languages would be a minimum