

#14



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:

Name of organisation* (if applicable):

Town/City:

Country*:

Ireland

E-mail address:

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

Other (please specify) Insurance provider

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) | 5 |
| 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. | 5 |
| g) Protect confidential business information | 5 |

Please provide additional comments

In item (g) - protect confidential business information - I would rate this at 5 however there should be a mechanism to ensure that relevant information which could compromise health and/or environment is publicly available and where necessary publicised.

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 | 3 |
| 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 | 2 |
| 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 | 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 | 2 |
| 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 | 2 |
| d) The available information on the presence of nanomaterials and products containing nanomaterials on the market is presented in an incoherent or ineffective way | 2 |
| e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market | 1 |

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 health and/or environmental hazards of specific nanomaterials/types of nanomaterials

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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 not aware of any significant exposure of workers/users/consumers to specific nanomaterials/types of 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

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If appropriate, please explain further:
This is a difficult question to answer however it is to be expected that the availability of a register should significantly contribute to reducing health and/or environmental risks.

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

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

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.

Notification per substance would enhance public authorities knowledge base and that of their supply chain as well as internal and external stakeholders to assess and manage risk so that a mature approach could be adopted to the use of nanomaterials in everyday life.

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)

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

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

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

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If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.)
This is a difficult question to comment upon, however to enable data gathering and assess the level of use of nanomaterials and their impact on health and environment the more comprehensive the register is the better for traceability and audit.

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
- ,
- f) Other (please explain):
Withy reference to item (c) above this could be expanded to outside of the EU also.

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

Categorised to:

Source, use, risk factors, benefits, licencing authorities, etc

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):

The principle of openness and transparency should be followed so that as full as possible a range of information should be available to all interested parties - SMEs, consumers, supply chains, etc

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

It should be specific and comprehensive and accessible in one location.

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

The importance of audit of use of the registry will be important and should be incorporated into the planning stage.