#1

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:

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 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	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)	5
d) Ensure consumer trust in products containing nanomaterials	4
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.	5
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	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	Do not know
e) Ensure the availability of relevant information on the presence of nanomaterials or products containing nanomaterials on the market	4
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	3
g) Protect confidential business information	4
Please provide additonal comments	There is evidence that there is no generic nano-risk. In fact, "nanomaterial" is a completely artificial catrgorisation (similar to "blue material"), so there is no real need for additional legislation. The current legislation is sufficient to check whether materials are hazardous, so there's no need for nano-specific legislation.

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	1
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	2
c) The current level of available information on the presence of nanomaterials and products containing nanomaterials on the market is detrimental to consumer trust	1
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	5
Please provide additional comments	ad c) The required labelling for food and health implicity assumes all nanomaterials are dangerous, which is wrong. This means, the legislation of food and cosmetics labelling undermine consumer trust.

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 not aware of any 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
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): But not because they were nano...
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

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

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)**	c) hamper innovation in the EU (e.g. through concerns about confidential business information or through additional costs related to providing information)
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)**	e) hamper intra-EU competitiveness, f) hamper 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.**

Notification per use would at least have the advantage to be relevant and would put the burden on the purchaser of a material, not on the producer.

Q16: **Which actors along the supply chain should be subject to notification requirements? (tick all that apply):**	e) Distributors to consumers (e.g. retailers)
Q17: **The following should be subject to notification requirements (tick all that apply):**	Please explain: None - as there is no generic nano-risk, a notification is not necessary
Q18: **Is there a need to exempt certain types of nanomaterials?**	Yes, certain types of nanomaterials should be exempted from a notification system , If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.) If materials have been produced for decades in the same way and are known to be non-hazardous (e.g. E551), no notification is justified.

Q19: Is there a need to exempt certain uses of nanomaterials?

Yes, certain uses of nanomaterials should be exempted from a notification system

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If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.)
Any use that does not expose retail consumers.

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)

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?

Make a searchabel database that gives the information per material.

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):

Respondent skipped this 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):

There is no established generic nano-risk. This means, any nano-registry is only unnecessary red tape.

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

None - REACH already requires chemicals to be tested. It is not credible that nanomaterials are so dangerous that they require special treatment.

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

This survey is biased, asi it clearly aims at generating reasons for having such a nanomaterial registry (already the "transparency measures" is an euphemism). Unless a generic nano-risk is demonstrated, no such measures are required.