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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:	Vincent Jamier
Name of organisation* (if applicable):	LEITAT Technological Center
Town/City:	Terrassa (Barcelona)
Country*:	Spain
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Q2: Please indicate if you are responding to this questionnaire on behalf of/as:	c) a health and safety institute/academic organisation/research organisation
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
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	4
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	3
g) Protect confidential business information	4

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)	3
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.	3
g) Protect confidential business information	4

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	4
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	4
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	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 aware of 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 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)	d) They would search for more information, Please explain: At first, they may be a first rejection on the product containing nanomaterials, however a clear communication on they impact on consumers will with time ensure the confidence of consumers. More we wait for it, more there will be a tendency to avoid them.

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, e) hamper intra-EU competitiveness, Please explain As it has been observed in France, this may have hampered slightly the competiveness of the french producers at first but with a correct control on importation and clear communication (meaning as a dialogue), this will stimulate intra-EU competiveness (with the increase of confidence with consumers) and avoid any health crisis that may be detrimental for the EU industry at a long term.

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.

It will permit to facilitate the risk assessment of the substance, permitting the track of the full cycle of the various substance and therefore establish a clear diagnostic in case of health problem in a particular use (taking in consideration synergetic effects and exposure level).

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) , Please explain: Importers of products containing nanomaterials should also been included (not often easy to determinate, however by knowing the product elaborated in EU, it will be easier to detect importation goods that may include them too).

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: Concerning d), there should be any need if only it is proved that no release along the value chain will occur.
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.) Inocuous degradable or soluble nanomaterials (time scale limit has to be defined).
Q19: Is there a need to exempt certain uses of nanomaterials?	Yes, certain uses of nanomaterials should be exempted from a notification system , If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.) Uses in which release and exposure for worker and consumers are eliminated.

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?

An online access would be facilitating access to general information for the consumers and workers. In another a more private and technical access could preview for authorities with annually revised handbook.

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

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):

Information on substances alone may not be enough for informed consumer decisions as risks of such substances may differ for the different product (potential for exposure).

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

More specific and detalles information of product containing nanomaterials will be identified enhance a clear understanding of their full value chain and permit government to act on due time in case of problem. We can not hide from up-coming problem, waiting for the problem to disappear itself.

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

Presence of Nanomaterials in the market should be clearly identified, however potential synergic effects shouldn't be excluded and knowledge of the substances associated with Nanomaterials in a product may be necessary.