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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:	
Name of organisation* (if applicable):	
Town/City:	
Country*:	Bulgaria
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
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	4
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	5
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	4
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	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	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.	4
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	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	5

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 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 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

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: I think you want more information about how these products affect health and what are the implications.
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)	b) have no significant impact on innovation
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)	c) have no significant impact on 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.	*Respondent skipped this question*

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), Please explain: Any manufacturer or importer who places on the market substances must notify the European Chemicals Agency to include this information to the Classification and Labelling Inventory. Since each notification include the identity of the substance, including the name and other identifiers on the molecular and structural formula, composition, nature and amount of additives; substance in accordance with the criteria of CLP; reason not to classify if the substance is classified in some but not all hazard classes or divisions, indicating whether this is due to lack of data, data insufficient for conclusive or data are insufficient to unclassified; specific concentration limits or M-factors, where appropriate, including justification for their determination; and label elements, including hazard pictograms, signal words, hazard statements and additional hazard. Manufacturers and importers to be aware of these specific properties of substances
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
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)

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?

The information must be clear and user-friendly way. All organizations and trade unions should be informed of this observatory. Unions can inform employees.

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):

To allow for the intended use have to know what risks these substances may cause and what is effect on human health.
It is necessary to have information on substances alone and require information for each concerned product.

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

European nanomaterial registry would be very useful for everyone, because through it we will have all the information about nanomaterials.
Additionally the registry will provide essential information to identify exposure of workers to nanomaterials and provide adequate health and safety protection of workers.

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

There is great uncertainty about the distribution and use of nanomaterials. Not all countries have a notification system, and there are no regulations or labeling systems specifically for nanomaterials. It is necessary to extend research and coordinate knowledge in this area to gain evidence- based knowledge about the risks and opportunities provided by this technology, in terms of workers occupational health and safety.