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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:	
Town/City:	
Country*:	Poland
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 do not want 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	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	1
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)	4
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	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	1

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 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 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
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
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)	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.

The added value of a notification per use is the availability of information on both uses of, and exposure to, nanomaterials in different situations. Exposure, type of risk a risk level depend strongly on the specific use of a nanomaterial. At the workplace different uses depend on: the activities performed (spraying, mixing, painting, sanding, welding, etc.); and how substances should and should not be used.
Public disclosure encourages the responsible actors to manage the risks and generate more interest in the company in assessing safety.

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 , 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?

Via Internet, on the labels and through education system

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):

A registry should include clear information about the substance/ article and its uses. This should include: advice on proper use and disposal of specific nanomaterials (whether used individually, in mixtures or in finished products); understandable information about possible risks (for both non-specialised workers and consumers): type of hazards, possible types of exposure, health and safety risks of this exposure, and information about protective measures, clothing and equipment to be used when manipulating nanomaterials. Since using products that contain nanomaterials can lead to a release of such materials into the environment, more information should be available.

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

The added value of a nanomaterial registry is that it will provide a harmonised information to the governments of precise information about the formulation of the product or mixture containing nanomaterials along the suppliers chain. In this way uncertainties regarding the hazardous properties of nanomaterials could be minimized at the level of risk assessment and risk management of the products and their ingredients, and have a better view of the life cycle of the product/substance.

Additionally the registry will provide essential information to identify exposure of workers to nanomaterials. Without this information adequate health and safety protection of these exposed workers will not be possible. Finally it involves the application of the cradle-to-cradle life cycle perspective to the design, manufacture and use of the nanomaterials.

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

Civil society strongly supports specific and clear regulation for nanomaterials and supports the Commission in its role to protect health and the environment. It is widely recognised that the current regulatory system does not work for nanomaterials.
Nanotechnology products and processes are already interacting with society and with workers in particular, but this is in the absence of sufficient knowledge of the detrimental effects to individuals. Furthermore, history has shown us that the misuse of technology can escape attempts to regulate it.