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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:

Town/City:

Country*:

France

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	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.	4
g) Protect confidential business information	4
Please provide additional comments	Assurer la transparence des produits fabriqués, importés et commercialisés en Europe. Evitez la distorsion réglementaire et économique par de la réglementation uniquement appliquée aux produits ou fabricants européens ou nationaux

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)	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	3
g) Protect confidential business information	Do not know
Please provide additional comments	Reach ne s'appliquent pas bien aux transformateurs et formulateurs car les quantités en œuvre sont faibles.

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	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	5
Please provide additional comments	avoir registre européen de déclaration de nanos avoir informations claires sur les résultats en tox et eco-tox sur les nanos (études OCDE ?)

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 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
,

Please explain your responses (if any, please report the nanomaterials, the health and/or environmental hazards, any relevant classification, any DNELs/PNECs/OELs, any exposure and in which condition):
connaissance de valeur limite d'exposition recommandée par le NiOSH Rapport de l'ANSES 2014 Registre R-Nano (rapport 2013) Si matériau parent classé dangereux : nano dangereux aussi. mais la difficulté est que beaucoup d'industriels et de chercheurs se limitent à la frontière du 100 nm alors que le nano va jusqu'au micron et que les propriétés nanos sont spécifiques aussi entre 100 et 1000 nanos.

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
,

Please explain (if any, please report the events and any scientific publication):
outre les problèmes de toxicité aigue liée à la chimie de la nano, les autres effets sanitaires potentiels peuvent se révéler à plus long terme sans être véritablement identifiés comme tel (contexte environnemental multifacteurs de pollution)

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
,

If appropriate, please explain further:
yes yes yes !

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:
cela permettrait de déterminer pour chacun son niveau d'acceptation : bénéfiques/risques

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

Comments:
cela permettrait de déterminer pour chacun son niveau d'acceptation : bénéfiques/risques et surtout d'avoir confiance si innocuité est indiquée

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)

b) enhance the competitiveness of European companies against extra-EU companies

Please explain
le public pourrait devenir suspicieux par rapport aux produits non européens équivalents mais sans information ou non enregistrés nano.

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.

la valeur ajoutée serait de pouvoir mieux identifier la présence de nano et la traçabilité du nano dans le produit final.

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:
 traçabilité de la présence de nanos jusqu'à l'utilisateur final et responsabilité rétroactives de tous les acteurs de la chaine de valeur en cas de problème sanitaire professionnel ou public.

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
- ,

Please explain:
 traçabilité de la présence de nanos jusqu'à l'utilisateur final et responsabilité rétroactives de tous les acteurs de la chaine de valeur en cas de problème sanitaire professionnel ou public.
 Connaitre potentiel d'exposition aux nanos

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

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

,

If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.)
 mais ds un deuxième temps, il faudra permettre de sortir de la liste de notification ceux considérés/prouvés comme non dangereux et/ou non émissifs au poste de travail et pour l'environnement et population.

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

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

,

If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.)
 dans l'absolu, il devrait être possible d'exempter ceux produits ds des matrices non émissifs intentionnellement ou pas et ceux jusqu'à l'élimination finale comme déchet. mais je pense que c'est impossible de le garantir...

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):
information sur les nanos importés en europe

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

étiquetage CLP-nano + info spécifique pour consommateur lambda sur un site internet dédié traduit en langue nationale (et pas qu'en anglais!!!)

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,
- g) Other purposes (please specify)
traçabilité - épidémiologie

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):

dangerosité des nanos
moyens de protection efficaces collectifs et individuels pour les travailleurs
information pour le public pour éviter l'émissivité non intentionnelle (perçage matériau...)

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

les quantités mises en cause.
peut être garder le système Reach en abaissant les quantités mises sur le marché et en spécifiant le caractère "nano" de la substance

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

Avoir une haute autorité européenne pour coordonner les méthodologies et hiérarchiser les résultats des recherches sur dangerosité des nanos et publier les résultats pour avoir des valeurs limites d'exposition minimales.