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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:	LOMBARD
Name of organisation* (if applicable):	ALLOTOXCONSULTING
Town/City:	Aulnay sous bois
Country*:	France
E-mail address:	

Q2: Please indicate if you are responding to this questionnaire on behalf of/as:	Other (please specify) toxicology consultancy
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	3
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	3
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	3
g) Protect confidential business information	5

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	4
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)	3
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.	2
g) Protect confidential business information	Do not know

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	2
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	4
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	It is more important that the consumers are ensure that the products containing nanomatérials on the market are sure, rather than knowing the présence or not of nanomaterials without safety assessment

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 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 not significantly contribute to reducing the health and/or environmental risks related to the use of nanomaterials , If appropriate, please explain further: It is not the registry which would ensure the safety of the population and the environment. The French registry is of non use for end users and recycling industry. The best action would be to enforce industry to make a safety evaluation of the product placed on the market if releases of nanomaterials may lead to human and environmental exposure. Instead of running after the data of all the existing nanomaterials (hazard), it is preferable to reverse the paradigme and work on the potential exposures (risk) to concentrate on the main problems for the protection of human and environment.

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)	c) Their purchasing decisions would not be affected , Please explain: Only ONG people and unsecure consumers will take care of the labeling , and be able to understand the informations.
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 , Comments: A fear market will be installed. We will see crazy label like "nanos free" even if they are not supposed to be present anywhere in this type of product. We will inform the public of the presence of nanos in products independently of the potential risk What is the risk with a bicycle including carbonnanotubes in the frame ?

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) , Comments: Innovation in an industrial will be made available to competitors prior to the releasing on the market.

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.

It will allow to make risk assessment for the end user.

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: It is important to inform the en users and the recyclers. For exemple In case of peints with nano TiO2 when the peints will be recycled at the end of its lifecycle, the workers must be informed what potential risk and protection to take.
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: The assessment must be risk based
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.) But the use of the nanos is more important

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

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

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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.)
Even medical treatment may lead to release into the environment

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)

b) Information from market studies on nanomaterials and products containing nanomaterials

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c) Information on the use of nanomaterials across Europe

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f) Other (please explain):
What is the purpose and the power of this Nanos Observatory if not to increase the number of civil servants? The problem,if any, must be treated locally if there is a potential release or exposure to human or environment. Only the rules and the organisation in each nation must be EU-wide

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

This Observatory should inform authorities on the market of nanos in Europe for political decisions and harmonisations of the rules within Europe.
For consumers and workers it is a local or nationwide problem.

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

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d) Development of strategies to ensure the safe use of nanomaterials

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):

The consumers or endusers must be ensure that the products on the market are safe with or without nanos. The risk based assessment along the lifecycle of the products is far more efficient.

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

NONE: Adapted REACH, by reducing the tonnage of registration action for nanos, is enough.

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

Make the national administrations more efficient, rather than creating a new EU level of inefficacity.