#42

COMPLETE

Collector: Nano Consult - Industry (Web Link)
Started:
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PAGE 2: Section I - Identification

Q1: Please provide the following details (*compulsory):	
Organisation*:	
Town/City:	
Country*:	Denmark
Contact name:	
E-mail address:	
Transparency Register ID number (if applicable)	
Q2: 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
Q3: We might need to contact you to clarify some of your answers. Please state your preference below:	I am available to be contacted
Q4: Did your organisation participate in the online survey (undertaken by RPA/BiPRO for the European Commission in early 2014) on the administrative burden of the notification schemes?	No

PAGE 3: Section II - Organisation Information

Q5: Please indicate which of the following applies to you or your members (tick all that apply):	k) Not sure whether we deal with nanomaterials
Q6: Please indicate the four-digit NACE code of your primary and secondary business sector (if applicable). If you require information regarding NACE codes, please visit the European Commission Competition webpage at http://ec.europa.eu/competition/mergers/cases/index/nace_all.html	*Respondent skipped this question*
Q7: Please indicate the number of employees.	50-249 employees
Q8: Please indicate the approximate annual turnover of your organisation and the annual turnover which relates to nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials).	*Respondent skipped this question*

Q9: Please indicate the number of nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials) that you place on the national market.	*Respondent skipped this question*
Q10: Please indicate the number of nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials) that you place on the EU market.	*Respondent skipped this question*
Q11: Please indicate the number of nano-related products (where these include nanomaterials as well as mixtures and articles containing nanomaterials) that you place on the global market.	*Respondent skipped this question*
Q12: Please indicate the number of customers and, if applicable, number of suppliers for all your nano-related products combined (where these include nanomaterials as well as mixtures and articles containing nanomaterials).	*Respondent skipped this question*

PAGE 4: Section III – Problem definition and objectives

Q13: **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	5
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	5
g) Protect confidential business information	5
Please provide additional comments	Concerning b) it is important to provide consumers with information but only when nano creates a risc to the consumer under normal use of the product.

Q14: 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	3
e) Ensure the availability of relevant information on the presence of nanomaterials or products containing nanomaterials on the market	Do not know
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	Do not know
g) Protect confidential business information	Do not know
Please provide additonal comments	we have only little knowledge of nano and related riscs under use. Consumers knows only Little about nanoriscs

Q15: 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	3
c) The current level of available information on the presence of nanomaterials and products containing nanomaterials on the market is detrimental to consumer trust	2
d) The available information on the presence of nanomaterials and products containing nanomaterials on the market is presented in an incoherent or ineffective way	3
e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market	5

PAGE 5: Section IV – Health and environmental aspects

Q16: With regard to health and environmental hazards and risks of specific nanomaterials/types of nanomaterials, please tick the relevant boxes:	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
Q17: 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
Q18: 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: EU should establish a registry avoiding national registries. Different national registries gives low data quality and low riscs assesments quality.

PAGE 6: Section V – Consumer trust

Q19: In case information on the presence of nanomaterials in your products were made available, what impact do you think this would have on your clients? (Please tick all that would apply)	b) They would try to avoid those products, d) They would search for more information, Please explain: Difficult to say - it depends of the product i.e. riscs. To day there is little knowledge thus b). Information about nano in the product should be based on a riscs otherwise b) will allways be the case..
Q20: 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: i.e. question 1 above. Trust only if information is based in riscs.

PAGE 7: Section VI - Innovation and competitiveness

Q21: 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, Comments: We do not know. It depend of the burden of registry and if this can be done in a meaningfull way

Q22: 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)	f) hamper the competitiveness of European companies against extra-EU companies , Please explain most of our products are imported to EU and to day European Companies allready meet sever burdens to REACH. REACH has not given Eu Companies better competiveness escpecially SME loose competiveness. The Commission should create a EU registry based on simple principles also avoiding more national registries.

PAGE 8: Section VII – Possible impact of a registry on your company/members of your association

Q23: Overall, how would a possible obligation to notify nanomaterials at the EU level affect your company/the members of your association, assuming that no exemptions were to be made from 1 (no impact) to 5 (significant impact):

a) with respect to nanomaterials on their own	4
b) with respect to nanomaterials in mixtures	4
c) with respect to articles with intended release of the nanomaterials	4
d) with respect to articles containing nanomaterials in general (i.e. in case also articles without an intended release of nanomaterials were to be covered)	4
Please explain:	there is many products that contains natural nano and how to deliver the information about the content after an unknown EU definition is a challange. Remember that the main part of our consumer products are imported.
Q24: Would disclosure of the notified information conflict with the confidentiality of business information?	If yes, please elaborate; you may differentiate according to the different information that may be required in a notification scheme (e.g.: if a notification is only per substance and general use, or if the exact use needs to be disclosed): it depends of what you ask for
Q25: Do you experience or expect any significant barriers for your company/members of your association from diverging registration obligations in the schemes in France/Belgium/Denmark?	Yes, we foresee significant barriers, If yes, please describe these barriers? Getting the information - time spend for registry - time spend for identifying what products are within the scope - NGO use it to scare the public - very low data quality for riscs assesment
Q26: Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?	If yes, please describe these differences I dont think so i.e. manu consumer products are produced out side EU and imported to all EU contries

Q27: In case the European Commission were to recommend a best practice model for national notification schemes based on the experiences in France, Belgium and Denmark, which elements of these systems can be considered as "best practice"?

We do not recommend a best practice model for national notification. The commission should not motivate member states to make their own registry. They will cause large unnecessary burdens to EU companies, damage the EU market and give low data quality.

There is no national "best practise model"

PAGE 9: Section VIII – Possible options and exemptions

Q28: 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 information should be gathered in a way giving the best possibililty doing riscs assessments. Information should describe riscs when using the product under normal use. If nano materials are used without any og low riscs to Health there should be no obigations - keep the burden low for Companies by register the nano use with the highest riscs.

Q29: Which actors along the supply chain should be subject to notification requirements? (tick all that apply):	a) Manufacturers of nanomaterials, b) Importers of nanomaterials, Please explain: the obligations should be kept up stream the supply chain. The manufactor and importers have better chances to deliver information than distributors. The burden should be placed on as few companies as possible.
Q30: The following should be subject to notification requirements (tick all that apply):	b) Mixtures containing nanomaterials, c) Articles with intended release of nanomaterials , Please explain: Riscs when using products with nano should be the focus
Q31: 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.) begind with high materials
Q32: 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.) some uses do not creat riscs to the consumers.

PAGE 10: Section IX – Nanomaterials Observatory

Q33: 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
,
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):
A simple EU registry is better than national registry

Q34: How should the information in a Nanomaterials Observatory be presented in order to reach the consumers, workers and authorities?

the consumers should be informed about nano when use may create a risc. This should be declared in the product.

PAGE 11: Section X - Potential use and benefits of a nanomaterial registry

Q35: In what ways could the information on nanomaterials from registries be potentially useful (tick all that apply):

Respondent skipped this question

Q36: 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):

Dont know

Q37: What would be the added value of a European nanomaterial registry beyond the current framework of chemicals legislation, including REACH registration?

EU registry may give more meaningfull information compared with several national registrations. Same rules for Eu manufactors and importers. EU Companies do one central registration and not several in different EU contries.

Q38: Please provide any other comments that you would like to share regarding transparency measures for nanomaterials on the market.

We recommend the Commission to establish a simple EU nano register ensuring data quality in an efficient manner. Begin registration of materials and products having highest riscs.

We hope that the Commission communicate the strategy to the market very soon. It is important to show leadership convencing member states not to establishing their own national registry.