#49

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*:	Belgium
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?	Yes

PAGE 3: Section II - Organisation Information

Q5: Please indicate which of the following applies to you or your members (tick all that apply):	*Respondent skipped this question*
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.	*Respondent skipped this question*
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	4
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)	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	1
f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.	5
g) Protect confidential business information	5

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	4
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)	1
d) Ensure consumer trust in products containing nanomaterials	Do not know
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.	2
g) Protect confidential business information	1
Please provide additonal comments	We have considered that legislative national frameworks were considered to be applicable to respond to this question.

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	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	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 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): For the last propositino, it could have be good to separate workers/users/consumers. Indeed, a worker in a nanomaterials production plant during 40 years should be exposed to specific 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 , Please explain (if any, please report the events and any scientific publication): A case study was recently published (Occupational handling of nickel nanoparticles: A case report, Shane et al (2014) DOI: 10.1002/ajim.22344.). However, this case study is referencing a sensitisation case which is linked to nickel and not to nanomaterial properties
Q18: 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

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
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

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)**	c) hamper innovation in the EU (e.g. through concerns about confidential business information or through additional costs related to providing information)
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)**	b) enhance the competitiveness of European companies against extra-EU companies , e) hamper intra-EU competitiveness, f) hamper the competitiveness of European companies against extra-EU companies , Please explain Stimulation between intra european companies may exist. However the administrative charge associated to inventories is requiring time/person/ressources which will not be devoted to research (especially for Start ups). This administrative charge may result in a protection of the european market (companies outside europe may not want to enter the market since new administrative requirements are applicable.

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	2
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)	1
Please explain:	We are not producing any final product.

Q24: **Would disclosure of the notified information conflict with the confidentiality of business information?**	Yes, there would be a conflict with business information confidentiality , 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): Some of the gathered information are highly sensible : customers list, uses, production volume. Based on the first french exercice we have identified potential markets in which we are not yet involved. The same identification could be done by other european companies and also by competitors from other greographical regions.
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? The total internal ressources devoted to this task is yet not that easy to identify due to the multitude of information to gather and actors involved for a large group.
Q26: **Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?**	Yes, the markets differ at national level, If yes, please describe these differences Production volume are highly depend on countries. Our customers network may also be partially revealed via national inventories.
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"?**	*Respondent skipped this question*

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.**

Use or substances as the main entry point is differing based on the aim to inform general population or naotinal authorities. The desired final target of the gathered informaiton will drive the choice between the substance (for national authorities) or use (general population).

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, c) Downstream users (e.g. re-formulators, manufacturers of products containing nanomaterials)
Q30: **The following should be subject to notification requirements (tick all that apply):**	a) Substances, b) Mixtures containing nanomaterials

Q31: Is there a need to exempt certain types of nanomaterials?	No, all kinds of nanomaterials should be subject to notification obligations
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.) R&D is highly sensible for companies (in particular due to the 100g threshold for notification). Since use are associated to notification, a declaration may reveal ongoing internal developments with possible financial impacts.

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)	a) Information from existing notification systems, c) Information on the use of nanomaterials across Europe , e) Information on the hazards and risks of nanomaterials

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

Information letters and Citizen conferences may be organised. National Citizen conferences may highlight particular focussed interrogation for some contries and the organisation of one citizen conference with a european panel may indicate the general vision.

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):	*Respondent skipped this question*

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

None, based on the current Reach framework.

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