#59

**COMPLETE**

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

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| **Q1: Please provide the following details (*compulsory):** | |
| Organisation*: | essenscia |
| Town/City: | Brussels |
| Country*: | Belgium |
| Contact name: | Tine Cattoor |
| E-mail address: | |
| Transparency Register ID number (if applicable) | 8111597333-73 |
| **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 under the name indicated |
| **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

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| **Q5: Please indicate which of the following applies to you or your members (tick all that apply):** | a) has to notify to the French Notification System<br>,<br>b) has to notify to the Cosmetic Products Notification Portal<br>,<br>c) is a manufacturer of nanomaterials,<br>d) is an importer of nanomaterials,<br>e) is a formulator of mixtures containing nanomaterials<br>,<br>f) is a manufacturer of articles containing nanomaterials without intended release<br>,<br>h) is a distributor of nanomaterials and/or mixtures containing nanomaterials<br>,<br>i) is a distributor of articles containing 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**

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| Primary business sector (NACE 4 digit code): | 20xy |
| Secondary business sector (NACE 4 digit code): | 21xy |

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| **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* |

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| **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).**

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| 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 | 2 |
| 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 | 2 |
| 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 | Nanomaterials (NMs) should be regarded as any other substance, as acknowledged in the second regulatory review. That implies general legislation on identification of hazards (under CLP) and risks (under REACH) is applicable. In that context, as required by REACH for instance, data should be gathered by industry in order to perform risk assessments and ensure safe use of the products that are placed on the market. Moreover, specific legislation covering sensitive products containing nanomaterials, like cosmetics, food or biocides, already require additional information and safety assessment for consumers. In general, existing workers safety legislation and environmental legislation is also applicable on nanomaterials, although not explicitly mentioned in the text. CLP already ensures consumers (and workers) are informed on the hazards of the products. We admit that at the moment it is not easy for consumers to find information on the hazards and risks of nanomaterials in their products. However, we are convinced that the expected new presentation of information in the |

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| | registration dossiers by ECHA (via infocard and brief profiles) and the further elaboration of the JRC webplatform for nanomaterials will help. An inventory is not the right tool for consumer communication. However, it is important that suppliers communicate to downstream users, particularly when safety is a concern. If there would be a safety concern, obligations are in place to ensure proper communication downstream (eg via SDS). |

**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?**

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| 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 | 3 |
| 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 | 4 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 4 |
| g) Protect confidential business information | 4 |
| Please provide additonal comments | essenscia is convinced that, as for any other chemical, consumer trust can be increased by a good implementation of the current European legislative framework (even if some adaptations in the REACH annexes are needed), provided that it is well explained to the public and the information is easily accessible. Additional requirements would constitute an administrative burden for companies with no guaranty of a potential positive impact on consumer trust. Negative consequences on the competitiveness and the innovation capacity of the chemical industry can nevertheless be expected. |

**Q15: To what extent do you agree with the following statements from 1 (strongly disagree) to 5 (strongly agree):**

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| 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 | 1 |
| 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 | 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 | There should be clear distinction between the availability of hazard and risk info on a NM and information available on a certain NM present in a 'product' (mixture/article). It is unlikely that consumers themselves can assess the hazards and risks of NM. Therefore the necessary information for health and environment should be available to the authorities, as is regulated in the current European legislative framework. Moreover, the different reports of the national schemes are expected to increase even more the incoherent way of presenting information on presence of nanomaterials in certain products. As consumers will find out that in certain countries a product is listed and in others the same product not, which will add to the confusion. As regards question e), on the basis of the experience gained by the chemical industry in France with the French notification scheme and discussions during the development of a Belgian scheme, essenscia confirms that such a national system creates obstacles to trade within the internal European market, especially when in Belgium a notification is required before the placing on the Belgian market of the product. The definition and the scope is not applied the same way in these countries and metrology skills do not guarantee harmonised interpretation. |

**PAGE 5: Section IV – Health and environmental aspects**

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| 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<br>,<br>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<br>,<br>I am aware of DNELs/PNECs/OELs set for specific nanomaterials/types of nanomaterials<br>,<br>I am not aware of any significant exposure of workers/users/consumers to specific nanomaterials/types of nanomaterials<br>,<br>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):<br>DNELS and reference values are existing for TiO2 and carbon nanotubes (under REACH and NIOSH) Where consumer exposure occurs with sunscreens or biocides, the products are subject to an official risk assessment and authorization. The same will apply eg for medical devices containing nanomaterials once the drat regulation on medial devices will be approved. Manufacturers of NM should have the appropriate risk management measures in place to protect workers and the environment. |
| 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 not significantly contribute to reducing the health and/or environmental risks related to the use of nanomaterials<br>,<br>If appropriate, please explain further:<br>Inventories designed to gather information on presence of NM in products will not contribute to reducing health and environmental risks related to the use. essenscia is convinced that the current European regulatory framework is best fit to gather the info on health and environment and assess the risk and if needed, restrict certain uses. We acknowledge however that amendments of REACH Annexes may be needed. This framework foresees hazards identification requirements, risk assessment methodologies and ensures safe use of NMs that are placed on the market (as such, in mixtures and in articles). Moreover, for hazardous NMs, traceability can be ensured via the Safety Data Sheet or REACH art 32/33 communication as regards industrial and professional users. |

**PAGE 6: Section V – Consumer trust**

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| **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,<br>Please explain:<br>The info we got from the French notification scheme on clients trying to avoid products containing NMs (either due to the administrative burden of the notification system or due to the "black-list" effect led by the stigmatisation of NMs with such a scheme) is already confirmed in Belgium although the inventory is not yet in place. The further down the supply chain, the more difficult to explain that a clear definition and validated measurement technique is lacking, hence leading to differences in interpretations for similar products and resulting in clients wanting to avoid products with NM. |
| **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<br>,<br>Comments:<br>It will depend on the market and supply chain and consumer knowledge and the beneifits. Depending on consumer knowledge, nanomaterials can be interpreted as a threat or a benefit. Generally outside professional users, there is poor knowledge about nanomaterials in products and the benefit they bring. This could lead to a priori negative feeling in the general public. However dialogue with end users have shown that there is no big interest in nanotechnology at this level. Appropriate and timely communication is needed to overcome a priori feelings in public eyes. Variability among countries is also a reality. |

**PAGE 7: Section VI - Innovation and competitiveness**

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| **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)<br>,<br>Comments:<br>The additional administrative burden within the whole supply chain will request re-sources that are hence not spent on looking for new opportunities and markets, and innovation and R&D. This is especially true for SMEs. This was indicated by companies during the Belgian impact assessment for a nano-inventory. |

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| **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<br>,<br>Please explain<br>essenscia agrees with the Cefic answer: There is no reason a priori to consider that a register is need for nanomaterials: they are not more or less hazardous than any other chemical. Asking for a register would create a burden on that specific industry producing, importing or using nanomaterials when competing with other non nano substances. In addition the cost of such register would most probably be borne by consumers so entailing increased prices for value chains in EU vs non-EU markets. The effect would be even stronger when industry would have to deal with several national registers. Intra-EU competitiveness would be hampered in this case. |

**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):**

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| a) with respect to nanomaterials on their own | 5 |
| b) with respect to nanomaterials in mixtures | 5 |
| 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) | 5 |
| Please explain: | As association of the chemical industry, life science and plastics, the notification would mainly impact substances and mixtures (eg paints), but also manufacturers of plastic articles where NM are embedded in the matrix (plastic converters are among our membership). The impact assessment of the Belgian inventory is available at summary of the impact assessment done by BiPro The report mentioned (p13) 'In general, for the entire supply chain, the number of unique products is as follows: there are around 2000-5000 unique substances, 80,000-160,000 unique preparations, and 800,000-1,300,000 unique articles containing NMs' and ' For all sectors evaluated, the number of companies placing a NM-containing product on the market was estimated to be between 35,000-45,000 enterprises. This represents approximately 15-20% of all the enterprises in Belgium according to 2011 data from the Belgian National Social Security Office' (p11). the public part of the report is available at: http://www.health.belgium.be/filestore/19086003/BE Nano Register Report_final.pdf |

**Q24: Would disclosure of the notified information conflict with the confidentiality of business information?**

Yes, there would be a conflict with business information confidentiality

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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): Indeed, several confidential information could be disclosed with such a notification scheme: - The name of the substance itself as sometimes competitors don't know that a substance can exist at nanoscale - The information linked to the substance identity (characterisation of the NM) - The uses - The quantities put on the market - The name of the customers If reporting/dissemination of information is considered, only aggregated data can be used;

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| **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,<br><br>If yes, please describe these barriers?<br>Diverging obligations not only increase the workload, but also add to the possible confusion in the supply chain as supply chains are not 'only national'. Companies with sites in different member states, will probably get different information. A significant barrier in Belgium is the obligation to register before the placing on the Belgian market. As other schemes merely monitor what has been put on the market the previous year, this will be confusing and might lead to products on the market where the registration has not been done on time. The Belgian scheme has a clause that 'mutual recognition' with other national schemes can be persued. This would reduce the burden within non-national supply chains as a customer can rely on the number of the supplier while making his notification without having the supplier to have to notify again to the Belgian scheme. Product related topics should preferably be handled at EU level not to hamper the intra-EU market by different national schemes. |
| **Q26: Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?** | No, there is not any significant difference in the national markets for our products<br>,<br><br>If yes, please describe these differences<br>not at the moment, although it is to be expected due to the different schemes |

**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"?**

-Use of the same nanomaterial definition, same criteria, same test methods and identical interpretation by national inspections.
- Transmission of the notification numbers along the supply chain (that can be used by the client to refer to the general Nano-substance characterisation data provided by the manufacturer/importer) in order to minimize the burden for companies and protect confidential information
- Maintain the registration/notification number as long as no changes occur to the characterisation of the NM (as in Belgium) (which is not the case in France adding to an additional yearly communication of the new registration number)
- Staggered deadlines if subsequent 'supply chain stages' (substance, mixture, article) would be considered to allow the info to be communicated in the chain
- mutual recognition of a notification number of another country done in another national scheme
- Consider as much as possible information as Confidential Business Information in order not to hamper more competitiveness and innovation

**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.**

communication in the supply chain would always refer to a 'nanomaterial-substance'. Irrespective of the notification, a safe use of the product must be assessed under the current legislative framework, which do not only cover the placing on the market, but as well the occupational hygiene and health of workers. Information to protect the workers can be found in the safety data sheets, so an inventory would not bring any added value.
We consider use notifications per mixture or per article (if this is defined as a 'use') even more burdensome than a notification that is substance related. What would be considered as the same article (eg same material, but different color; same color, same material, but different shape; etc )? A kind of 'grouping' of related 'uses' would need to be considered to reduce the administrative burden.

**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)

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Please explain:
That depends on the concern you want to address. For sure, Europe must ensure a level playing field, so the requirements should be the same for EU based companies and non-EU based companies importing into EU, so that means importers should be equally subjected. Reach should be the framework for the notification (registration) for NM substances for Manufacturers and importers. For DU, that would depend of the position in the supply chain and the existence of sector-specific requirements depending on the 'use' of the final product.

**Q30: The following should be subject to notification requirements (tick all that apply):**

Please explain:
The scope can only be defined by the concerns that would be addressed (if not yet covered by other legis-lation). Anyway, asking for information on all products (even articles with no intended release) can lead to an overarching vague of notifications that could hide any potential added value that could be brought by such a system. It was our understanding that concerns are mainly about 'new' nanomaterials (developed for special nanoproperties) and not on substances that 'became nano' due to the number based definition (eg pigments, fillers, …). Whatever products could be subject to an obligatory notification, the provisions must be enforceable as well. Definition, measurement techniques, scope etc should be undoubtfully clear.

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| **Q31: Is there a need to exempt certain types of nanomaterials?** | Yes, certain types of nanomaterials should be exempted from a notification system<br>,<br><br>If yes, which types should be exempted and why? (in terms of specific properties, available knowledge, absence of hazards, etc.)<br>Information that is already available for authorities, should not be asked again. Different legislative frameworks (REACH, CLP, sectoral frameworks such as biocides, cosmetics, food) already require health & environmental data and an assessment of the risks. This should not be asked again. However, this information should be clear for consumers and more easily accessible (eg via the web platform). Whatever products could be subject to an obligatory notification, the provisions must be enforceable as well. Definition, measurement techniques, scope etc should be undoubtfully clear. |
| **Q32: Is there a need to exempt certain uses of nanomaterials?** | Yes, certain uses of nanomaterials should be exempted from a notification system<br>,<br><br>If yes, which uses should be exempted and why? (in terms of specific exposure scenarios, available knowledge, absence of hazards, etc.)<br>uses to be exempted: - Uses where the nanomaterial is embedded in a matrix and hence not available as such during the whole life cycle (including waste) - Uses already regulated by sector specific legislation - Use of Non-intentionial nanomaterials - Use of NM without exposure |

**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,

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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d) Information concerning products containing nanomaterials

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e) Information on the hazards and risks of nanomaterials

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f) Other (please explain):
essenscia believes that publishing (non-confidential) information on nanomaterials already regulated at EU level (ie used in food, cosmetics, biocidal products as well as substances submitted under REACH (once An-nexes are adapted for nanomaterials) and CLP) would already increase transparency to a large extent and cover most needs.

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

see Cefic answer: As mentioned before, the REACH database and the work engaged by ECHA on Infocards and Brief Profiles could be a good start.
For consumers, market studies would be of greater values. For workers and authorities, more accessible information from ECHA dissemination would be useful.
In a consumer friendly way. The German websites: www.nanopartikel.info/ or www. Nanoportal-bw.de/ could be used as example.

**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):**

All the potential benefits mentioned above can be obtained at lesser costs and easier way than to create a separate nano-inventory.
Risk assessment and/or risk management is already done under REACH (and more clarifications are under development)
Enforcement of worker protection can only be done if there are more trained enforc-ers to actually go and enforce. If you want to give workers a kind of 'enforcing' role, they already have the right to know what they are working with and to be protected by risk management measures specific to their situation to be provided by their em-ployer.
Promotion of safe use of nanomaterials in products. This would imply that with the information in the register an assessment per product would be made to clearly dis-tinguish the safe and unsafe uses in products. This would mean info that should be there under REACH will have to be registered again? If it focusses on promoting the results of some EU research projects, than again, a registry is not needed.
Development of strategies to ensure safe use of nanomaterials. This should be possi-ble with the already existing information. It would be a pity if a register is only intend-ed for developing strategies. If there are scientifically justified concerns on the safe use of nanomaterials, the current REACH framework can be used to gather more info (eg via evaluation) and/or restrict uses where a risk has been identified.
Informed purchasing from consumers. This would mean they could link the info on a certain substance to the product they want to buy. That would mean a very extensive registry. The labelling requirement in cosmetics and food already indicates to consum-ers when a nano-ingrediënt is present.
General education of the public. With the raw data supplied by industry? Via reports? This can already be done with the existing info and is/has being been done by several EU projects eg Nanosoc in Belgium.

essenscia considers that the administrative burden, the risk of releasing confidential information and the negative expected impact on economy outweigh the potential positive impact of the scheme. Indeed, no benefit from the Belgian scheme is expected in the near future. Moreover, an EU inventory and a national inventory at the same time would be detrimental for the Belgian industry.

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

No added value identified so far on addressing concerns on hazards and risks. It seems nice to have in case of a potential problem would occur. However this can be said for any substances or products put on the market. Nanomaterials are not more dangerous per se as any other chemicals.
The only advantage of a European action would be that member states should not define, nor maintain their own (different) schemes and at least some harmonisation on EU level could be achieved.

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

On the basis of the experience gained by the chemical industry in France with the French notification scheme for nanomaterials, essenscia would like to support the below comments from the French Chemical Industry Association, UIC, as we as well have identified the same concerns and difficulties during the discussions on the Belgian scheme.

First of all, UIC would like to raise the difficulties faced by companies in the context of the first year declaration exercise (2013):
• The understanding/implementation of some definitions (“nanomaterial”, “intentionally manufactured”, “professional users”, “distributors”… ), all the more that some of them have been adapted in a national context without consistency with the European ones (“importer”, “distributor”);
• The problem of nanomaterials characterization and the lack of validated methods, enhancing the uncer-tainties for stating if a substance is a nanomaterial or not;
• The difficulties when communicating in the supply chain (especially with suppliers outside France that were not aware of the regulation);
• The burden for companies, especially for SMEs;
• The broad scope of the scheme: why to report on substances marketed for decades without known health and environmental impacts? Why to report on non-hazardous substances?
• The issue of so precise and low quantities to be reported;
• The frequency of the reporting (once a year);
• The public report that can provide sensitive information (like the tonnage range when only one company declares).

But besides these difficulties, the main issues that UIC wants to underline are:
• The mistrustful perception of the scheme by economic partners and consequently, the negative impact on competitiveness and innovation: indeed, the French notification system has brought uncertainties amongst economic actors towards the French market, leading, in some cases, to question marks regard-ing business developments and location of R&D activities in France;
• The disruption of the free movements of goods within the EU as the French system is likely to create significant obstacles to trade of substances and mixtures;
• The questionable added-value of such a scheme (especially versus REACH and existing regulations) whose objectives can appear unclear.

In the end, UIC considers that the administrative burden, the risk of releasing confidential information and the negative impact on economy outweigh the potential positive impact of the scheme.

In Belgium, the disruption of the free movements of goods might be more significant as the notification is required before the product is placed on the Belgian market. The French systems monitors what has been on the market the year before, what is a big difference.