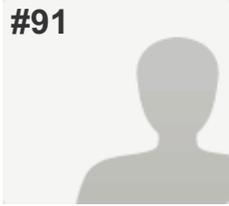


#91



COMPLETE

Answers Entered Manually

Collector: Web Link - Manual Entry 10 (Web Link)

Started:

Last Modified:

Time Spent:

IP Address:

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:

Respondent skipped this question

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 | 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) | 4 |
| d) Ensure consumer trust in products containing nanomaterials | 4 |
| 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. | 3 |
| g) Protect confidential business information | 3 |

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 | 3 |
| 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 | 3 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 3 |
| g) Protect confidential business information | 3 |

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 | 3 |
| 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 | 3 |
| 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

For the Plastics industry the national registers sometimes require to register composites which contain additives which may eventually have been formulated in nanoform. The Second Reg Review makes it clear that a composite does not have to be treated in the same way. National registers lead to unnecessary and unjustified extra work.

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 not aware of any 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):

Perhaps it is necessary to refer to ‘real’ exposures to mainly non-engineered nanoparticles, in processes such as welding, cigarette smoke, fine dust, ... When it comes to exposure within the plastics value chain it is important to notice that compounders (those that mix additives such as colorants and plastics) to produce pellets that are then injection molded or converted by downstream plastics converters, have a specific position in the value chain allowing them to take risk measures. Once the mix is made, exposure to workers and consumers is negligible. One of our recent projects, named NanoSafePack (FP7) has found evidence for that.

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

,

If appropriate, please explain further:
Not for the plastics industry, because of the reason mentioned above. Compounders and masterbatchers are those companies that mix plastics and additives and sell the ‘ready-to-convert’ composites (plastics containing additives) to plastics converters that make product out of it. One can compare the situation with those who make paints. Paints contain pigments, but once the mix is made, the particles are embedded in an emulsion and do not come free. For well-engineered and exfoliated nanofillers the interaction with the plastics matrix can be sufficiently high to make it thermodynamically unlikely that the fillers / additives can come out of the mix.

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,
Please explain:
Consumers are uncertainty avoidant. Some level of ignorance and the style of the debate sometimes confuse consumers.

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)

b) have no significant impact,

Comments:
For plastics this type of information is not always adequate to transmit a message. Inks used to print newspapers and labels on products may contain pigments in nanoform and as nearly every product may contain such labels it is unclear which added value there is in transmitting information on that.

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)

Comments:
We have noticed that the venue of national registers have caused additive producers to step away from na-nomaterials. Still without having any indication that the specific use of it, even if established over decades, would yield any serious exposure to consumers. Other stakeholders along the value chain may also lose further interest.

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)

e) hamper intra-EU competitiveness,
f) hamper the competitiveness of European companies against extra-EU companies

Please explain
The markets of engineered nano-additives for plastics (f.e. carbon nanotubes, ...) are in infant stage. There is no or very few general application of nanomaterials ('new' nanomaterials) in the industry. There is a lot of knowledge on nanomaterials that could have some benefits for the plastics industry but the implementation will flow away elsewhere.

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):

Please explain:

Compounders and masterbatchers call for an EU-level approach, rather than memberstate action. Note that the market of engineered nanomaterials in Europe is premature. NanoCyl, Europe's major producers of carbon nanotubes, isn't selling over 200 tonnes of nanotubes in Europe. Meanwhile the volume of the plastics industry in total weight of plastics is over 47 million tonnes of plastics produced. The amounts of conventionally used materials that may fall under nanodefinition is potentially much bigger.

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

Respondent skipped this question

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?

Respondent skipped this question

Q26: Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?

Respondent skipped this question

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.

For the plastics industry it will be important to distinguish the chemical industry, also the masterbatchers and compounders (perhaps the most important stakeholders in the discussion) and subsequently converters of plastics.

Converters of plastics buy pellets which they inject or transform in films or other (semi) finalised products.

Whereas compounders and masterbatches have the knowledge of what 'goes in the mix'.

Implementation of standards and procedures on safety measures and also on the technologies to succeed in 'dispersing' specific nanofillers in plastics of compounders and masterbatchers may be the best way forward to succeed in reducing risks related to the use of nanomaterials in plastics.

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)

Please explain:

c) Converters? No. Compounders and masterbatchers? Eventually.

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

- a) Substances,

Please explain:

The specific effects of nanomaterials used in plastics and eventual higher toxicity will always be linked with their high specific surface. The high specific surface may yield catalytic activity. When embedded in plastics matrix, this high specific surface is not reachable. There is evidence on this (ref. FP7 NanoSafePAck)

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.)

Plastics compounds Available knowledge, absence of migration, ... can clearly substantiate this position. Nanomaterials do not 'come out' of plastics

Q32: Is there a need to exempt certain uses of nanomaterials?

Respondent skipped this question

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)

Respondent skipped this question

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

Respondent skipped this question

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):

- a) Risk assessment and/or risk management

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):

Need to distinguish between plastics that contain pigments, ... and are in fact composites (and thus not directly under scope ref second reg review)

With those applications where consumers can lead to exposure.

Cosmetics, food, etcetera

The problem so far encountered in the discussion is that there is little knowledge on the nature of the value chain of some industries, such as in our case.

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

The main advantage would be perhaps to avoid the occurrence of 10-20 other registers with each their own registration number and rules.

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

Cas numbers cannot solve the issue, so specific information on shape and nature of nanoparticles would then be needed but is this adequate?

And, who would need that information and draw conclusions from it?

If information transmittance along the value chain cannot be solved the implementation of registers will lead to a lot of difficulties.