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**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*:	ETRMA
Town/City:	Brussels
Country*:	Belgium
Contact name:	Lorenzo Zullo
E-mail address:	
Transparency Register ID number (if applicable)	6025320863-10

**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**

**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  
 ,  
 d) is an importer of 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](http://ec.europa.eu/competition/mergers/cases/index/nace_all.html)**

Primary business sector (NACE 4 digit code):	C22.1.1 - Manufacture of rubber tyres and tubes; retreading and rebuilding of rubber tyres C22.1.9 - Manufacture of other rubber products
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**Q7: Please indicate the number of employees.**

≥ 250 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).**

Annual turnover ≥ €50m

**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.**

Articles less than 6

**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.**

Articles less than 6

**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.**

Articles less than 6

**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).**

Number of suppliers 16 to 30

**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  | 3 |
| 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.  | 4 |
| g) Protect confidential business information   | 5 |

Please provide additional comments Relevant information should be provided by nano materials suppliers to downstream users.

**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](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)                                  | 5 |
| 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   | 4 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden.  | 4 |
| g) Protect confidential business information   | 4 |

**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   | 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  | 2 |
| e) The establishment of national registries and notification schemes causes market fragmentation and hampers trade within the internal market   | 5 |

**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 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 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)**

c) Their purchasing decisions would not be affected  
,

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)**

b) have no significant impact

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)**

c) have no significant impact on intra-EU competitiveness  
,

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

Please explain Extra administrative cost

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

<p><b>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):</b></p>	5
<p>a) with respect to nanomaterials on their own</p>	5
<p>Please explain:</p>	<p>No nanomaterials are contained in rubber compounds (i.e. after mixing). The same is applicable for finished/vulcanised rubber products (i.e. tyres and general rubber goods).</p>
<p><b>Q24: Would disclosure of the notified information conflict with the confidentiality of business information?</b></p>	<p>Yes, there would be a conflict with business information confidentiality</p> <p>,</p> <p>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):</p> <ul style="list-style-type: none"> <li>- Information on types of nanomaterials used in specific products are highly confidential.</li> </ul>
<p><b>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?</b></p>	<p>Yes, we foresee significant barriers,</p> <p>If yes, please describe these barriers?</p> <ul style="list-style-type: none"> <li>- Admin burden - Conflicting scope of national registries - National schemes are not linked</li> </ul>
<p><b>Q26: Is the market for your nanomaterials/products containing nanomaterials significantly different from Member State to Member State?</b></p>	<p><i>Respondent skipped this question</i></p>
<p><b>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”?</b></p>	<p><i>Respondent skipped this question</i></p>

PAGE 9: Section VIII – Possible options and exemptions

<p><b>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.</b></p>	<p><i>Respondent skipped this question</i></p>
<p><b>Q29: Which actors along the supply chain should be subject to notification requirements? (tick all that apply):</b></p>	<p>a) Manufacturers of nanomaterials,</p> <p>b) Importers of nanomaterials,</p> <p>Please explain: As in REACH.</p>

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

**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.)  
Amorphous silica and carbon black have been used as reinforcing fillers in the rubber industry for decades. In rubber industry applications, they are used in a form that exceeds all proposed size dimensions for nanomaterials. Although they have primary particle sizes in the nanoscale, the particles to which workers may be exposed during raw materials handling are in the micrometer size range as a result of aggregation and agglomeration. Based on physical characteristics, exposure to amorphous silica and carbon black used in the rubber and tyre industry is not likely to result in exposure to nanoscale particles, primarily due to aggregation and agglomeration of the particles. Furthermore, from a toxicological perspective, it appears that existing regulations on amorphous silica and carbon black are sufficiently health protective. Accordingly, additional or different regulation is not necessary to ensure continued safe use of these materials in the rubber and tyre industry. No nanomaterials are contained in rubber compounds (i.e. after mixing). The same is applicable for finished/vulcanised rubber products (i.e. tyres and general rubber goods).

**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)**

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

f) Other (please explain):  
International studies/ updates ISO/OECD...

**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):**

f) General education of the public

**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?**

No added value for the EU tyre and rubber industry.

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

*Respondent skipped this question*