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COMPLETE

Collector: Nano Consult - Industry (Web Link)
Started:
Last Modified:
Time Spent:
IP Address:

PAGE 2: Section I - Identification

Q1: Please provide the following details (*compulsory):

Organisation*:	RTE
Town/City:	Paris La Défense
Country*:	France
Contact name:	Laetitia PASSOT
E-mail address:	
Transparency Register ID number (if applicable)	669359510572-76

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):

j) None of the above

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

Primary business sector (NACE 4 digit code):	D35.1.2 - Transmission of electricity
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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
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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 | 5 |
| 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 | 4 |
| f) Ensure the proportionality of the information requirements and the associated costs and administrative burden. | 4 |
| 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 | 1 |
| 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) | Do not know |
| d) Ensure consumer trust in products containing nanomaterials | 1 |
| 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. | Do not know |
-

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 | 5 |
| 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 |

Please provide additional comments

Manufacturers of power cables use nanomaterials in the insulation of underground cable to improve their properties. However, the presence of nanomaterials inside the cable is not always indicated to transmission system operators which purchase these equipments. Customers need to know the composition of the equipments they use in particular when they contain nanomaterials because they have the responsibility for their recycling and disposal and cannot take the risk of releasing nanomaterials into the nature during these recycling and disposal phase, which could have a damaging health or environmental impact.

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 not aware of any 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

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:
A European register of nanomaterials should be completed by the manufacturers of equipment producing equipments containing nanomaterials, so that the public and the users could be informed of the presence of nanomaterials in their products. A European register of nanomaterials would not reduce health and / or environmental risks. It is only the prohibition of toxic nanomaterials which would reduce such risks.

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)

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)

b) have no significant impact on innovation

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)

Respondent skipped this question

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 | 1 |
| b) with respect to nanomaterials in mixtures | 5 |
| c) with respect to articles with intended release of the nanomaterials | 1 |
| 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:

The mandatory notification of nanomaterials at the European level would require our suppliers to provide some confidential information on the chemical composition of their materials (eg synthetic insulation), an information that we try to get today without much success.

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):
The disclosure of notified information may encourage some competitors to review the chemical composition of their product.

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?

No, we do not expect any barriers

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.

Notification based on the use would allow the identification of people exposed to a type of nanoparticles, which would be useful in case of a health risk would be confirmed.

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)
- ,
- d) Distributors to professional users (e.g. wholesalers)
- ,
- e) Distributors to consumers (e.g. retailers)

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

- a) Substances,
 - b) Mixtures containing nanomaterials,
 - c) Articles with intended release of nanomaterials
 - ,
 - d) Articles containing nanomaterials without intended release
 - ,
- Please explain:
Customers need to be informed of the presence of nanomaterials in the products they buy. This will allow for the definition of appropriate policies for the destruction and recycling of used products, in order to avoid their release into the nature.

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?

No, all uses of nanomaterials should be subject to notification obligations

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
- ,
- d) Information concerning products containing nanomaterials
- ,
- 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?

label on the product
information in the product notice
handling specification
notification to the public authorities
website
tablet application

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,
- b) Enforcement of worker protection,
- c) Promotion of safe use of nanomaterials in products
- ,
- d) Development of strategies to ensure the safe use of nanomaterials
- ,
- e) Informed purchasing decisions by consumers,
- 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?

Respondent skipped this question

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

Respondent skipped this question