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Answers Entered Manually

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PAGE 2: Section I - Identification

Q1: Please provide the following details (*compulsory):	
Organisation*:	SUEZ ENVIRONNEMENT
Town/City:	Paris
Country*:	France
Contact name:	Cédric Verdeaux
E-mail address:	
Transparency Register ID number (if applicable)	27799842497-69
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?	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)	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.	3
g) Protect confidential business information	Do not know
Please provide additonal comments	There is nowadays no pertinent information about nanomaterials in REACH. The threshold of 1 tonne in the REACH Regulation is not enough to include nanomaterials.

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	5
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	4
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

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 , 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): The knowledge about nanomaterials, in terms of dangerousness, stays limited. The 2014 ANSES (French Agency for Food, Environmental and Occupational Health & Safety) report showed it well. Some nanomaterials are already considered dangerous as the carbon black or the TiO2.
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):	I do not know, If appropriate, please explain further: It will depend of the information given in the registry and the follow-up conditions; as well the link with the CLP Regulation.

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)	a) They would be more inclined to purchase those products , 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 , Comments: It will depend of the researches and the communication and if it allows excluding risks for certain nanomaterials

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)**	Comments: It is difficult to predict the impact without knowing the contents of the registry.
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

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):	*Respondent skipped this question*
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.**

The mixture with certain products can generate particular properties and the conditions of utilisation can influence the health and environmental risk. A notification per use can be more appropriate.

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: It has sense only if it is combined with the labelling of products. The question of traceability at the end of the product's life is important.
Q30: The following should be subject to notification requirements (tick all that apply):	a) Substances, b) Mixtures containing nanomaterials, d) Articles containing nanomaterials without intended release
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, b) Information from market studies on nanomaterials and products containing nanomaterials , 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?	*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,

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):

Our priority is to manage all risks linked to our waste and water activities and sites, including the risks linked to nanomaterials. All Health and environment aspects linked to the presence of nanomaterials should be dealt with to protect workers/users/consumers.

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

The first added value could be to allow homogeneity between countries. For the moment, some countries declare the nanomaterials while others consider that it is not necessary. The limit of the REACH registration is the threshold of 1 tonne for the registration of a substance. It is clearly not adapted to nanomaterials. It should also be identified the risks according to the substances and the size (example with the TiO2).

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

It must be sure that transparency is included in the all life-cycle of the product. It should be guaranteed with scientific proofs.