

Tour de Table  
Core aspects related to  
nanodatabases and labelling of the  
German Stakeholders

- **VCI supports creating more transparency for „nano products“ by means of databases**
- **Substance level: Generate more transparency in the ECHA data bases**
  - Make EU nanomaterial definition (incl. test method) binding for IUCLID 5.x
  - This allows adequate communication with downstream users on uses
  - Is the basis for nanomaterial-specific SDSs for communication in the value chain
- **Transparency at the substance level is an indispensable prerequisite for transparency on products which contain nanomaterials**
- **Consumer products: use, and if needed improve, existing sectoral mechanisms and instruments**
  - A lot has happened in regulation since 2009: cosmetics, biocidal products, polymers with food contact, printing of food packaging (DE, shortly to come)
- **Labelling: In VCI's opinion in principle only for products with hazardous properties**
  - New Biocides Regulation requires nano labelling for nano silver treated textiles; nano labelling also for food additives and for cosmetics

# **BUND demands for traceability and transparency of nanomaterials' use**

## **Create market transparency for authorities**

Competent authorities need to know which nanomaterials are used in which products to be able to fulfil their job

- mandatory notification (at first at national level if no European solution viable)
- creation of a nano inventory
- independent registration of nanomaterials under REACH

## **Rebuild the consumer's the right-to-choose**

Consumers should have a right-to-know which products contain nanomaterials and if they want to buy them

- mandatory labelling
- provide additional information (e.g. through an inventory)
- inform the public actively about the introduction of new technologies, and be transparent about potential risks

## Responsible use of nanotechnology along the value chain

- IG BCE supports a greater transparency for nano-products
- The due care principal for nano-products must be included in the safety data sheet along the value chain
- Works councils have to monitor carefully health and safety at work, therefore also the handling of the nano technologically relevant materials and processes. The responsibility lies in the enterprises.
- For IG BCE, scientific findings form the bases for a responsible use of nanotechnology. Safety research must be intensified.

## Nanotechnologies – guarantee identification and traceability !

- Manufacturers of nanotechnological products bear a big responsibility on the future perception and acceptance of this technology.
  - Safety of nano-products offered on the market must be guaranteed by manufacturers and needs to be validated by independent institutions.
  - Adjustment of advertised and actual benefits of nano-products .

## Position of german consumer organisations

- Establishing an **international consistent definition**.
- Expansion of research on **risk- and technology-assessment**.
- **Authorization and registration** of nano-materials and –products.
- **Declaration of products** and raw-materials containing nano-materials.
- Special focus on **safety of children**.
- Close gaps in **legal framework**.
- **Active information** and **improved communication** towards consumers.



No data – no surveillance

Ministerium für Umwelt,  
Gesundheit und  
Verbraucherschutz

### **Expectations**

#### **to translate precautionary principle in deeds**

A nano-specific EU-wide product register (better than different national ones):

Sampling of data for consumer protection as well as for environmental purposes

(Decision of the Conference of the Ministries for Environment, May 2011)

### **Projects**

#### **to reveal the sources in the traceability-chain**

Establishing a system to detect and cover all facilities/plants handling or processing with nanomaterials in the Federal States

(Decision of the Conference of the Ministries for Environment, May 2011)

### **Lessons learned**

#### **to avoid the usual faults**

- no new agency for **Epic Fail** and **Strange**
- **Assumptions** or a new directorate for **Curious Action**
- no more bureaucracy instead of transparency
- no more reporting obligations than assistance

### **Hopes**

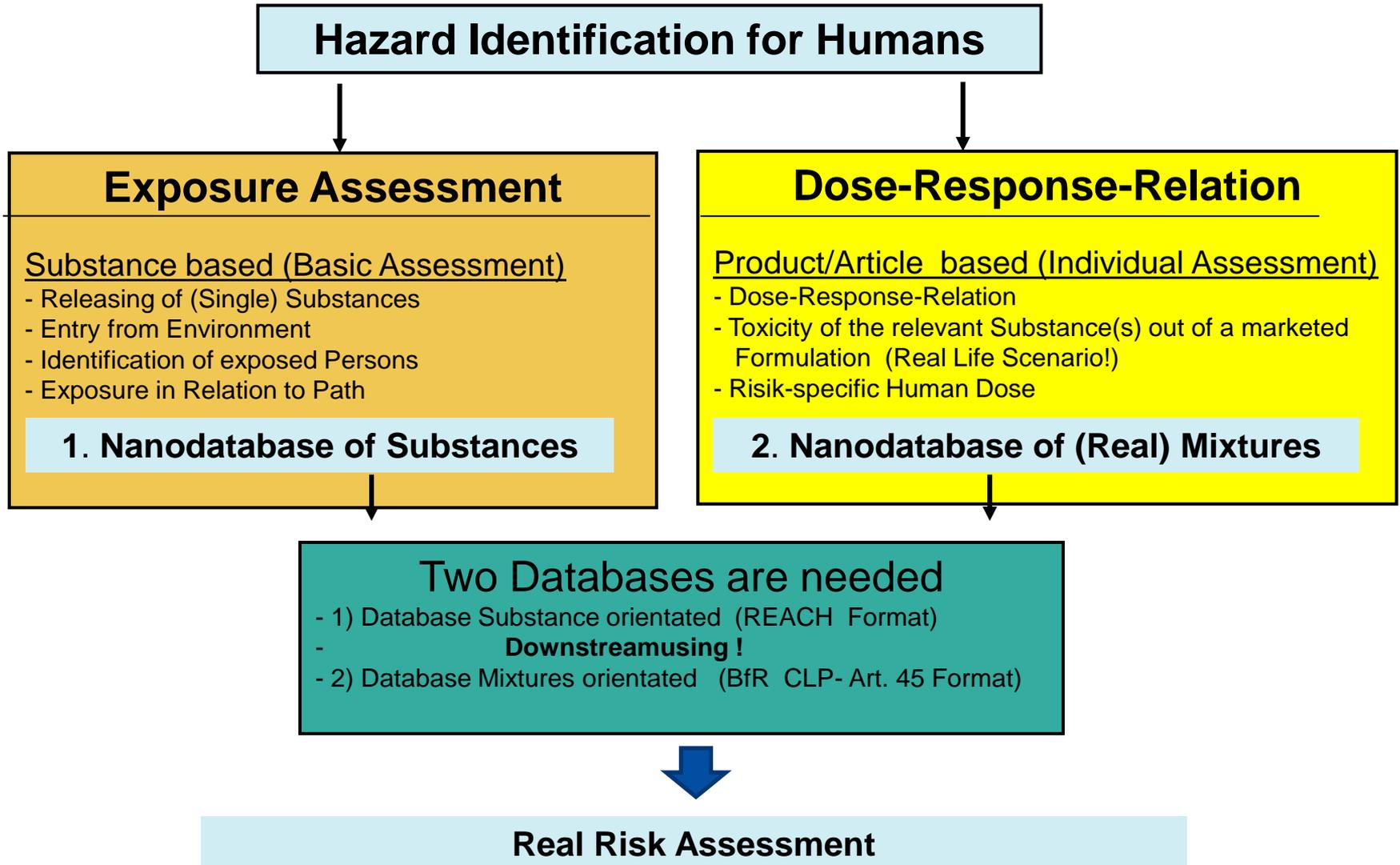
#### **to ensure a reasonable surveillance**

- a common EU-register of products supporting national authorities for consumer and environmental protection
- specific national/regional registers of facilities and plants dealing with “nano”

## Considerations on a register for nanoproducts

- **Why?** Knowledge gap on risks of NM
  - Traceability for authorities
  - Transparency for consumers / in the product chain
- **How?** Electronically; preferably European
- **Legal framework?** Separate regulation, but mainly omnibus regulation referring to REACH, other substance legislation (e.g. Biocides) and product legislation (e.g. Cosmetics)
  - Avoid doubled obligations and inconsistencies
- **Which products?** Nanomaterials, mixtures with NM, articles with possible release of NM – necessary to group articles and mixtures
- **Which data?** Only basic data ( e.g. characterisation, tonnage bands, uses / functionality) – differentiation between open data and a confidential part
- **Labelling?** Only a non-discriminatory registration number which allows searchability
- **Maintenance?** Ensure updating (including deletion of old data)
- **Effort?** Impact study planned, but the database is expected to be manageable for notifiers and authorities – official controls (in particular regarding imported articles) necessary

# BfR Risk Assessment (Chemicals/Food)



# 4 facts from the BAuA-questionnaire on NM

- 454 answers from approx. 1750 invitees asked to participate (26%)
  - 109 of 454 have NM production, use or emission from processes (24%)
  - Of 109: 57 vs. 52 answers industry vs. research institutes (52% vs. 48%)
- Personnel dealing with NM in total: 1-10: 63% -- 11-50: 30%
  - Industry: 1-10: 75% -- 11-50: 18%
  - Research: 1-10: 50% -- 11-50: 44%
- 1-5 NM handled by 69% of all answers (top answer: 300 NM)
  - Industry: 1-5 NM handled by 80%
  - Research: 1-5 NM handled by 54%
- Top 5 Materials:  $\text{SiO}_2$  (am),  $\text{TiO}_2$ , MWCNT, Ag-NP,  $\text{SiO}_2$  (cryst):  $\Sigma = 44\%$ 
  - Industry:  $\text{SiO}_2$  (am),  $\text{TiO}_2$ , Carbon Black,  $\text{SiO}_2$  (cryst), Polymer ( $\Sigma = 52\%$ )
  - Research: MWCNT,  $\text{TiO}_2$ , Ag-NP, Ceramics/Glasses, Au-NP ( $\Sigma = 43\%$ )