Input & discussion - stakeholders meeting annual report nanoregistry 18 April 2017

1. ***If a substance has no CAS-number and no CE-number and the substance is used for R&D purposes only (simplified registration), will the names of these substances be mentioned in the list of substances?***

   It is not foreseen to include the substances, registered as simplified registrations, in the list of substances. These type of registrations do not contain information on the quantity used, where the list of substances will mention the sum of the quantities imported and produced.

2. ***How will you avoid double counting of the quantities?***

   Only the quantities which are either produced on, or imported to the BE territory, will be taken into account for the calculation of the tonnage ranges of a substance.

3. ***It can take a long time before we will be certain about the risks associated with nanomaterials. For instance, it can take 40 years until we know if the use of nanomaterials increases the risk for carcinogenicity. How will the public be informed on products that contain nanomaterials? How can a consumer identify whether a tooth paste contains nanomaterials?***

   Different legislations apply to nanomaterials, depending on the application field of the products they are used in. Some legislations, e.g. for cosmetics, make it obligatory to mention the presence of nanomaterials on the label of the product.

   The scope of the BE nanoregistry is not to collect data about toxicological or eco-toxicological effects of the nanomaterials, neither does it foresee an obligation to label the consumer products containing nanomaterials. The BE nanoregistry aims to collect data (physicochemical properties, trade name(s), supply chain,…) and thus to provide traceability about the presence of nanomaterials, used by professional users, on the BE market.

4. ***The goal of the nanoregistry is, amongst others, to protect the well-being of workers and of the public. How does the registry reach that goal?***

   Article 23 of the Royal Decree (RD) of 27 May 2014 states that, when a company has to register its nanomaterial in the registry, it also has to inform its Committee for Prevention and Protection at Work.

   Article 18 of the RD of 27 May 2014 states that, in case there is evidence that a substance produced in nanoparticular state may pose a risk to the public health or the health of workers, the FPS Health, Food Chain Safety and Environment can require the registrant to hand over all the information in his possession with regard to

   a. the potential hazards of the substances produced in nanoparticular state which he places on the market as such or as a constituent of a product;
   b. the direct or indirect exposures of persons these substances may give way to;

c. any information that may be useful in terms of assessing the risks these substances may pose to public health and the health of workers.

The registry provides in traceability along the supply chain. This means that, via its commercial name, a certain nanomaterial can be traced back to find out where it comes from and in which other products/tradenames it is used.

5. The representative of the **Superior Health Council** refers to the **advice** that the SHC has formulated in the context of the RD of 27 May 2014 concerning the placing on the market of substances produced in nanoparticular state. The advice can be consulted via https://www.health.belgium.be/nl/advies-9119-kb-nanoparticulaire (only available in Dutch and French).

6. ***Do you have an internal system to check the quality of the data in the registry and how do you foresee to do that?***

The individual registrations will be evaluated according to a number of criteria. For the technical data (measurements), a first check will be performed to see if the data are registered and if they are acceptable (e.g. result, method used, standard deviation, measurement uncertainty, …).

7. ***Do you plan to have a focus on nanomaterials that end up in the environment? Is there information on the products containing nanomaterials, how they should be used, what to do at the end of the life cycle,…?***

This is not in the scope of the RD of 27 May 2014. The registry will contain information on the nanomaterials placed on the BE market and is limited to the professional users. The registry does not require submission of any toxicological or eco-toxicological information.

8. ***Does the registry include only substances? What about the mixtures?***

At the moment, the procedure to publish a new RD is on-going. This new RD will change the RD of 27 May 2014 in the sense that cosmetics are exempted from the scope and that the deadline for the mixtures is changed from 1st January 2017 to 1st January 2018.

Further questions?

Contact our help desk at info@nanoregistration.be