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NIA

Nanotechnology  
Industries Association



Europe

Mr Peter van Der Zandt  
DG Environment  
European Commission  
Rue de la Loi 200  
1049 Bruxelles

1 September 2008

Dear Mr van Der Zandt,

**Cefic's, Eurometaux', NIA's and IMA's comments on CASG Nano/05/2008**  
*CASG Nano/05/2008 (2 July 2008), Supply of information, prepared by  
DG ENV and DG ENTR*

The Chemical and Nanotechnology Industries appreciate the opportunity to comment on the paper CASG Nano/05/2008 to contribute to shaping future discussions in a way that is consistent with the overall objectives of REACH. To maximise the outcome that the provisions of REACH could give, it is essential to focus all our limited resources to fulfil not only industries', but also the Member State's Competent Authority requirements which are laid down by the regulation.

During the meeting of the Competent Authority Subgroup on Nanomaterials, 1-2 July, a proposal for initiating a voluntary reporting scheme was tabled with the intention of gathering data and more detailed information about the applications, volumes produced and used, of nanomaterials.

The Signatories believe that such a voluntary scheme would significantly overlap with the goals laid down by the requirements of REACH, as the requested information will be provided under REACH. In addition, the Signatories also believe the current proposal does not take into account that much of the information requested would be confidential business information. Provisions to protect such information are an integral part to REACH enabling such data to be safeguarded in a suitable way.

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Chemistry making a world of difference

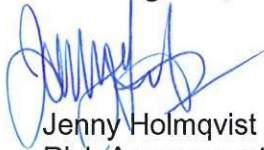
European Chemical Industry Council

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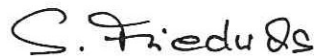


In conclusion, the Signatories' opinion is that without a further clarification on these concerns the proposed reporting scheme as it currently stands cannot be supported.

Best regards,



Jenny Holmqvist  
Risk Assessment Manager  
Cefic



Dr Steffi Friedrichs  
Director.  
Nanotechnology Industries Association



Joeri Leenaers  
EHS manager  
Eurometaux



Dr Roger Doome  
Technical Director  
IMA - Europe

Same letter sent to Otto Linher  
Copy to: Maila Puolamaa, Henrik Laursen