



## National Industrial Chemicals Notification and Assessment Scheme Proposal for Regulatory Reform of Industrial Nanomaterials

Public Discussion Paper – October 2009

### Business Impact Survey

All submissions will be placed on NICNAS's website. For submissions made by individuals, all personal details other than your name will be removed from your submission before it is published on the NICNAS website. Confidential material contained within submissions should be clearly marked. Reasons for a claim to confidentiality must be included in the submission coversheet. Where possible confidential material will be redacted from information published on the NICNAS website.

1. Are you ... ? (Tick one or more)

- a manufacturer of nanomaterials                       an importer of nanomaterials  
 an importer of products containing nanomaterials

2. Is your business currently registered with NICNAS?

- Yes     No

3. If yes, what NICNAS tier do you register under?

- Tier 1                                       Tier 2                                       Tier 3

4. How many substances that you import or manufacture would be classified as an industrial nanomaterial, or classified as containing nanomaterials, according to the definition supplied in the Public Discussion Paper?

four or more

What type of nanomaterials are these, and what is their intended application?

zinc oxide, oxylink - product based on zinc oxide, zinc monoglycerolate, various nano coatings.  
Intended applications - cosmetic, industrial.

#### Re: Impact of regulation of nano-forms of new chemicals (Section 3a of the Discussion Paper):

5. If interested in manufacturing or importing a nanoform of new chemical would you introduce under a NICNAS exemption category? If so, under which of the following exemption categories?

- Low Volume or <1% cosmetic     Transhipment     Research and Development

6. If interested in manufacturing or importing a nanoform of new chemical would you apply for a permit or certificate for that substance?

- Permit     Certificate

Why?

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7. If in industry, would removal of the self-assessment certificate category affect your business?

Yes  No

If so – how?

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8. Would the proposed changes (in 3a of the Discussion Paper) to the current regulatory framework negatively impact on your ability to import/manufacture a nanoform of new chemical?

Yes  No

Explain the impact of these changes on your business:

presents high expenses for business

**Re: Impact of regulation of nano-forms of existing chemicals (Section 3b of the Discussion Paper):**

9. If you are manufacturing or importing a nanoform of an existing chemical or importing a product that contains a nanoform of an existing chemical, how many (and what types of) substances would you be required to report under a one-off use specific reporting scheme?

four or more substances: zinc oxide, oxylink - product based on zinc oxide, zinc monoglycerolate, various nano coatings

10. Would this incur an unacceptable regulatory burden on your operating costs?

Yes  No

How much would you expect this to cost?

\$1,000,000 per product

11. Is a mandatory notification and assessment program for nanoforms of existing chemicals feasible?

Yes  No

Why?

Presents very high expenses for business

12. Would the types of data (shown in flow chart of Attachment 7 of the Discussion Paper) be available for you to serve these requirements?

Yes  No

If No, why?

presents very high expenses to business

13. Would the proposed changes (in 3b of the Discussion Paper) to the current regulatory framework negatively impact on your ability to import/manufacture a nanoform of an existing chemical?

Yes  No

Explain the impact of these changes on your business:

increased burden on manufacture

**General impacts:**

14. Do you think that these proposals would affect competition?

Yes  No

If yes, then which ones in particular?

the global manufactures would eliminate local manufacturese

15. If yes to Q15, would this increase or decrease competition?

Increase  Decrease

Why?

The global manufacture would eliminate local manufacture

16. Will these proposals affect consumers?

Yes  No

If yes, then how?

cinsumers will obtain the products through global manufactures

**Thank you**