Dear Supplyer xxx

**Our obligation to report to The Danish Nanoproduct Register**

According to Danish law we are under a legal obligation to report information to the Danish Nanoproduct Register under the Danish Environmental Protection Agency about the consumer products that we put on the market which contain nanomaterials.

It is the consumer products that release nanomaterials that we must report.

**Requested information**

We therefore need to clarify whether the [xxx products we have bought from you / the raw materials/components we have bought from you and used in the production of our products] release nanomaterials under normal use.

Furthermore we request certain information about the nanomaterials in your products.

Following this letter, we have attached the forms with the questions that the Danish Environmental Agency wants us to answer. The form consists of **mandatory** as well as voluntary elements.

The Danish Environmental Agency invites companies to report as much as possible.

We must emphasize, that we only request the information that you already have available about the nanomaterials in your product – or that you are able to get from your suppliers. We are not requesting that you perform further analyses of your products.

**Protection of commercial confidential information**

Should you consider the information that we request to be commercially sensitive, we can inform that commercial confidential information is protected in the Danish Nanoproduct Register. The register will not be publicly accessible. The information we request will therefore not be made available to the public. Only the responsible authorities will have access to the information in the register.

Only where urgent action is essential to protect human health, safety or the environment, such as emergency situations, may confidential information in the register be disclosed to the public.

**You may report yourself in stead**

If you do not wish to release information about the nanomaterials in your products to us because you consider the information to be commercially sensitive in our business relationship as well, the Danish Environmental Protection Agency invites you to contact the Agency and report the information directly to the Agency – either yourself or via your Only-Representative in the EU.

If you wish to report directly to the Danish Environmental Protection Agency, please contact Nadine Heidi Brueckmann at the Agency on the following e-mail address: [nahbr@mst.dk](mailto:fling@mst.dk).

In that case we kindly request that you send us the registration number that you get when you have made the report. We will not have access to the information that you or your Only-Representative report directly to the register. The information will only be available for the responsible Danish authorities.

**Product group registration / Danish Product Register registration**

Different products, that have the same use and contain the same nanomaterial(s) can be registered as a group, i.e. self-cleaning paint in different colours but all containing the same nanomaterial(s)

If you have already reported the same information to the Danish Product Register under the Danish Working Environment Authority, please inform us – or the Danish Environmental Agency - about the Product Register registration number.

**Deadline**

Please, send the requested information to us by (Date) - or report the information directly to the register by (Date) and inform us about your direct report and the reporting number you have received after your report at the same date.

We might possibly contact you again, should we need further information.

Thank you for your kind co-operation

Should you have any queries about this request, please, do not hesitate to contact us.

Yours sincerely,

Customer company xxx

*Note: The Danish Nanoproduct Register is established to gather knowledge on the amounts and types of consumer products releasing nanomaterials that are sold on the Danish market as well as the use of these products. The information gained from the Danish Nanoproduct Register will be used as input for the assessment of potential risks (and safe use) for consumers and the environment with regard to the use of nanomaterials.*

The new Danish legislation on the Danish Nanoproduct Register and the associated guidance document are available on:

<http://mst.dk/virksomhed-myndighed/kemikalier/miljoestyrelsens-nanoindsats/nanoproduktregistret/>

**Information on nanoproduct for the Danish nanoproduct register**

Please note:

Heading of sections containing mandatory information is **underlined**

|  |  |  |
| --- | --- | --- |
| **Mandatory product information**  **The supplier is invited to enclose any documents (e.g. laboratory tests and reports), which inform about the content/absence of nanomaterials. A declaration of each product is requested.**  **If the supplier declares no use of nanomaterials in all products sold to (company), one declaration can cover all assortments, different colors and designs.** | | |
|  |  | Confidential information[[1]](#footnote-1) |
| Article name/product name:­­­­­­­­­­­­­­­­­­­­­­ |  | □ |
| Article description (use, other relevant information): |  | □ |
| The reasons for wishing confidentiality may be given here. |  | |

To fill in the questionnaire below, please consult definitions and interpretations below the tables.

Please, attach relevant data for the information requested (analysis reports etc.) and any additional information that may be of value to the reporting, whether deliberately mentioned in the questionnaire below or not.

|  |  |
| --- | --- |
| **Voluntary product information[[2]](#footnote-2)**  **Please fill in for each nanomaterial in the product.** | |
| Chemical product category (PC)*.* |  |
| Process category (PROC) |  |
| Environmental release category (ERC) |  |
| Article category (AC) |  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Mandatory information on nanomaterial Identity and composition**  **Please fill in for each nanomaterial in the product.** | | | | | | |
|  | |  | Information  unavailable[[3]](#footnote-3) | | Confidential information1 | |
| Name of nanomaterial | |  | □ | | □ | |
| Is the substance registered under REACH (y/n)? | |  | □ | | □ | |
| REACH registration n0. | |  |  | | □ | |
| How is the nanomaterial incorporated in the product?[[4]](#footnote-4) | |  | □ | | □ | |
| Chemical name[[5]](#footnote-5) | |  |  | | □ | |
| CAS no.[[6]](#footnote-6) | |  | □ | | □ | |
| European Commission (EC) Number (EINECS or ELINCS)[[7]](#footnote-7) | |  | □ | | □ | |
| Chemical formula | |  | □ | | □ | |
| **Voluntary information on nanomaterial identity and composition**  **Please fill in for each nanomaterial in the product.** | | | | | | |
| Nano content (mass)[[8]](#footnote-8) |  | | □ | |  | |
| Nano content (%)[[9]](#footnote-9) |  | | □ | |  | |
| **Voluntary information on nanomaterial physical properties**  **Please fill in for each nanomaterial in the product. Please fill in for each nanomaterial in the product.** | | | | | |
|  | | | | Confidential information1 | |
| **Particle size** | | | | □ | |
| *Particle size (nm)* |  | | | | |
| *Variance (nm)* |  | | | | |
| *Method used[[10]](#footnote-10)* |  | | | | |
| *Test guideline used* |  | | | | |
| Number-based particle size distribution | | | | □ | |
| *Method used[[11]](#footnote-11)* |  | | | | |
| *Other methods* |  | | | | |
| *Test guideline* |  | | | | |
| Aggregation and agglomeration | | | | □ | |
| *Middle size of aggregates (nm)* |  | | | | |
| *Variance (nm)* |  | | | | |
| *Method used* |  | | | | |
| *Is the nanomaterial sold as agglomerates (y/n)?* |  | | | | |
| *Middle size of agglomerates (nm)* |  | | | | |
| *Variance (nm)* |  | | | | |
| *Method used* |  | | | | |
| *Test guideline* |  | | | | |
| Form | | | | □ | |
| No. of dimensions in the nanoscale |  | | | | |
| Qualitative description of nanoform[[12]](#footnote-12) |  | | | | |
| Other descriptions |  | | | | |
| Method used[[13]](#footnote-13) |  | | | | |
| Other method used |  | | | | |
| Test guideline |  | | | | |
| Specific surface area | | | | □ | |
| Mean specific surface area (m2/g) |  | | | | |
| Variance (m2/g) |  | | | | |
| Method used[[14]](#footnote-14) |  | | | | |
| Other methods used |  | | | | |
| Crystalline surface | | | | □ | |
| Is information available (y/n)? |  | | | | |
| Crystalline trivial name |  | | | | |
| Crystalline form[[15]](#footnote-15) |  | | | | |
| Test guideline |  | | | | |
| Surface chemistry | | | | □ | |
| Is the nanomaterial coated (y/n)? |  | | | | |
| Additional qualitative specification of coating |  | | | | |
| Specify coating[[16]](#footnote-16) |  | | | | |
| Surface charge | | | | □ | |
| Zeta potential |  | | | | |
| pH at measurement |  | | | | |
| Specify the medium that measurement is made in |  | | | | |
| Test guideline |  | | | | |

|  |  |
| --- | --- |
| **3. Supplier’s signature**  **The undersigned supplier to (company) guarantees that the information given in this Declaration is correct.**  **(Company) reserves the right to use the information in this Declaration as a basis for documentation towards the authorities, for registration in the Danish nanoproduct register. The undersigned supplier to (company) accept this.** | |
| Supplier’s full formal name: |  |
| Phone and e-mail of contact person |  |
| Signature |  |
| Date |  |

1. According to §8 in the statutory order, the reporting party may indicate that selected information is to be regarded as a trade secret, including information on chemical information, substance identification, composition or purity. The reporting party must justify why the information is to be regarded as a trade secret. [↑](#footnote-ref-1)
2. State how the product is categorized according to use descriptor system used under REACH. You can find this information on the safety data sheet of the product, for example. The categorization can be determined as described in: ”Guidance on information requirements and chemical safety assessment, Chapter R.12: Use descriptor system” available on http://echa.europa.eu/documents/10162/13632/information\_requirements\_r12\_en.pdf. [↑](#footnote-ref-2)
3. According to §5 no. 5 in the statutory order, reporting of certain pieces of information may be omitted from reporting if, in conjunction with the reporting, it is also concomitantly documented that it is not possible or excessive costs would be incurred to obtain the information. [↑](#footnote-ref-3)
4. Describe how the nanomaterial is present in the product: “Solid”, “Liquid”, “Gas”, “powder” [↑](#footnote-ref-4)
5. IUPAC name of the chemical substance in the nanomaterial. [↑](#footnote-ref-5)
6. Specify the unique CAS number. It is in the form: YYYYYY-XX-X, where Y is 3 to 6 digits. If the CAS number is not available, indicate it here. [↑](#footnote-ref-6)
7. A 7-digit number, which will be written in the form: XXX-XXX-X. If the EC number is not available, indicate it here. [↑](#footnote-ref-7)
8. Specify the content of each nanomaterial in the product by weight of nanomaterial per product [↑](#footnote-ref-8)
9. Specify the content of each nanomaterial in the product as a percentage of nanomaterial per product. Note if it given as a weight or volume percentage. [↑](#footnote-ref-9)
10. Describe the measurement method: “Transmission electron microscopy”, “MEB”, “Atomic force Microscopy”, “other” [↑](#footnote-ref-10)
11. Describe the measurement method: ”DLS”, “Laser Diffraction”, Gravimetrical Centrifugation”, “Differential centrifugation sedimentation”, “Raman Spectroscopy”, “other method used”. [↑](#footnote-ref-11)
12. Use one of the following: ”Spherical”, “Pseudo spherical”, “Sticks”, “Star”, “Full fiber”, “Hollow fiber”, “Film”, “Capsulate”, “Other” [↑](#footnote-ref-12)
13. Describe the measurement method: “Transmission electron microscopy”, “MEB”, “Atomic force Microscopy”, “other” [↑](#footnote-ref-13)
14. Describe the measurement method: “BET using nitrogen”, “TEM/EM calculation”, “SAXS”, “Other” [↑](#footnote-ref-14)
15. Describe the crystalline form: “Cubic primitive”, “Cubic body-centered”, “Cubic face-centered”, “Tetragonal Primitive”, “Tetragonal body-centered”, “Orthorhombic primitive”, “Orthorhombic body-centered”, “Orthorhombic face—centered”, “Orthorhombic base—centered”, “Monoclinic primitive”, “Monoclinic base-centered”, “Triclinic primitive”, “Rhombohedral primitive”, “Hexagonal primitive” [↑](#footnote-ref-15)
16. Describe the coating: ”Hydrophile organic coating”, ”Hydrophobe organic coating”, ”Hydrophile inorganic coating”, ”Hydrophobe inorganic coating” [↑](#footnote-ref-16)