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To  
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cc

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Subject

NanoCEO comments to NICNAS about engineered nanomaterials [No Protective Marking] [No Protective Marking]  
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Feb. 12, 2010

To whom it may concern:

I am writing on behalf of the Nanotechnology Citizen Engagement Organization (NanoCEO) in regards to the regulation of nanomaterials by NICNAS. NanoCEO is a citizen-based organization in the United States that has been meeting for several years to discuss emerging nanotechnologies and to build capacity for lay citizens to have meaningful voice in decisions and policymaking about these technologies.

We are concerned about risk management and policy decisions about nanotechnologies in the United States as well as countries all over the world. In our increasingly globalized economy, products made in one country are consumed in another, raw products are extracted from yet another, and wastes are often disposed of in yet another. Emissions from the extraction of raw materials, disposal of old products, and the burning of waste materials finds its way all over the world. Moreover, regulators and risk managers in one country can lead in developing proactive, preventative policies, setting precedents and creating models for other countries.

NanoCEO feels strongly that a precautionary approach should be the central principle in managing the risks of nanotechnologies. We have learned in our discussions, research, and meeting with scientists and others working on these issues that nanomaterials, because of their small size and unique properties, are likely to be harmful to human and ecosystem health in some circumstances. While we know that there are numerous unknowns and uncertainties about these risks--in part because environmental health and safety research is severely under-funded worldwide--we feel strongly that this should not delay the development of proactive and precautionary regulations, especially given that many of these nanomaterials are in consumer products that will be ingested or put onto or into the body in other ways. In using a precautionary approach for nanomaterials, NICNAS would be in line with the recommendations of 71 governments, 12 international organizations and 39 NGOs that met at the 2008 international Forum on Chemical Safety in 2008.

In line with a precautionary approach to nanomaterials, NICNAS should work to ensure that both nano-forms of existing chemicals, and nano-forms of new chemicals face mandatory safety testing before they can be used in products. The commercial use of nanomaterials should be stalled until the safety science catches up, risk assessment procedures can be validated, and these materials can be adequately tested for their potential risks throughout their entire life cycle (extraction, workplace, consumer products, waste, environment, etc).

Of course, many engineered nanomaterials are already on the market and in consumer products. NICNAS should prioritize the community's 'right-to-know' about these nanomaterials--including accessible information on the types and quantities of nanomaterials used, labelling of products with engineered nanomaterials, etc. Risk assessment reports done by NICNAS and other agencies and industries should be published in full in places fully accessible to citizens and other interested parties. Further, we have seen in the U.S. that voluntary initiatives on nanomaterials that have been ongoing for several years are failing. NICNAS should pursue mandatory regulation of nanomaterials and a formal review of the NICNAS regulatory framework should be required 2 years after it begins.

Thank you for considering our comments.

Sincerely,

Maria Powell

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...Only dead fish go with the flow...

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