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cc

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Subject Nanomaterials Questionnaire [No Protective Marking]

DOCUMENT NOT YET CLASSIFIED

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Is this Confidential:
Confidential Information:

Question 1:
The APMF agrees with the definition given. It is crucial that the words "intentionally produced" be used. In our industry, through the grinding processes used to manufacture paints, nanomaterials may sometimes be produced but in such small quantities they are of a very low risk and especially when produced as paint in a liquid.

Question 2:
The APMF understands the need to assess all new chemicals, including new nano forms of existing chemicals for any health and safety risk that they might impose on the community and the environment and agrees with the proposed exemptions for transhipment and R&D.

Every effort should be made however, to utilise the outsomes of credible overseas assessment regimes that are scientifically sound, to reduce the cost burdens to industry whilst protection and health and safety of the community and the environment.

Question 3:
Applicants should be able to rely on international documents produced by credible bodies such as Regulators provided that the information addresses the health and environmental concerns raised by any new nano-form of a chemical.

Question 4:
It is difficult for the APMF to estimate what additional imposts to industry could result from the proposed new requirements, indeed more so as research into nonomaterials is expanding rapidly. Better judgements will be possible say after 12 months of operation of any new requirements. The APMF therefore recommends that any new R&D reporting requirements be reviewed after 12 months.

Question 5:
The given advantages and disadvantages are agreed and noted. To mitigate the burdens of introducers, alignment or acceptance of the outcomes of other credible Regulators should be a major NICNAS priority.

Question 6:
The APMF also agrees that any new system should contain flexibility to

amend permit conditions when new data is available that affects or changes the risk profile. Appropriate costs to industry would also encourage the best outcomes, ie data that is being continually updated and improved.

Question 7:
The APMF accepts that voluntary calls for information will always have limitations. The APMF therefore supports the Stream 1A (a voluntary once off, use specific reporting program) leading to Stream 1B (a mandatory once off, use specific reporting program) may be needed for information on nanomaterials. Again, every effort should be made to work with other agencies in the USA, Canada, the UK etc to access the latest scientific activities to build knowledge in this area.

Question 8:
Any decision to move forward in this area should be done so based on sound scientific principles and be scoped to address known risks to the public health and the protection of the environment from nanomaterials that pose a risk to the community health and safety or the environment.

Question 9:
The Public interest is best served when the type of information that will be collected are made available on the public record. There is clearly then an expectation on Government that all information made public is reliable and accurate at the time of collection.

Question 10:
Care must be taken to exclude nanomaterials that are produced unintentionally and found in such small amounts per weight of total volume to render them harmless. It would be a very expensive process indeed if sensible limits were not placed on liquids (says paints) that are known or suspected to contain very small levels of nanomaterial.

Question 11:
See responce to Question 10.

Question 12:
Same reponse as given at Question 9 within the constraints of commercial in confidence and the menagement of intellectual property.

Question 13:
Could certainly be considered in the future.

I am or represent: Industry organisation
If Business, Num of Employees:
If Other: