Australian Government
Department of Health and Ageing
NICNAS

National Industrial Chemicals Notification and Assessment Scheme

Proposal for Regulatory Reform of Industrial Nanomaterials

Public Discussion Paper – October 2009

Have Your Say Questionnaire

All submissions will be placed on the 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. What is the significance and/or consequence of this working definition for 'industrial nanomaterials'?

   Limiting upper size to 100nm may miss biological effects of conglomerate molecules - 300nm may be preferable

2. How do you think the proposal to limit access to exemptions for nano-forms of new chemicals will contribute to protecting health and the environment?

   At this stage of our knowledge, being too strict is preferable to allowing broad access to exemptions

3. Describe any ways in which you think self-assessment by an independent third party could be used to effectively achieve the same results?

   (This question is confusing: being a third party to oneself is not possible).
   Self assessment of effects on humans of an item, both upon oneself or upon other selves, is subject to the huge influence of unconscious blindness, i.e. denial, so independent third party assessment is better.

4. If in R&D, what, if any, practical issues arise from the proposed administrative amendment for annual reporting of R&D exemptions? Would it require a significant increase in reporting? If so – how much?

   Monitoring exemptions annually would be sensible, in spite of any possible overload

5. What are your views on the impact of the proposal to regulate nano-forms of new chemicals with the above changes to the permit and certificate categories? Can you identify additional advantages or disadvantages?

The proposals seem good for now, especially as they allow for learning from experience which may lead to further changes being proposed

6. What are your views on a system that is sufficiently flexible to amend permit conditions where new data indicates a new risk profile?
   I prefer flexibility

7. What are your views on the impact of the proposal for mandatory once-off, use specific reporting for nano-forms of 'existing chemicals'? Can you identify additional advantages or disadvantages?

   I am among those who support the need for as much information as possible about these materials, because of the potential for harm from their increasing amounts in the environment and the subsequent mass effect on human physiology

8. Explain how you think the potential burden of once-off, use specific reporting could or could not balance community expectations in relation to health and environmental standards?

   As a member of the relatively uninformed community, I think it is important to keep tabs on as much information as possible of these materials at this stage. Any burden upon manufacturers would be surely minimal with once-off reporting.

9. What are your views on making the information gathered through streams 1A and 1B publicly available?

   Industrial secrecy and commercial interests are usually heavily self-protective. I am in favour of openness, but I realise frightening consumers unnecessarily with early data is unhelpful to industrial developments. There is no easy answer to this issue, but on the whole, worrying data ought to be made known, but obviously would need confirmation before being made public.

10. What are the advantages and disadvantages of the introduction of a system that required a mandatory notification and assessment program for all nano-forms of existing chemicals? What are the reasons for this answer?

    see 8 above

11. What are current issues that affect the feasibility of such a program?

    no comment

12. What are your views on making the information gathered from assessments of nano-forms of existing chemicals publicly available?

    see 9 above

13. How might an integrated approach provide for more effective regulation of industrial nanomaterials compared to the package of options proposed in sections 3a and 3b?

    It just seems logical that a centralised, integrated approach is less likely to overlook evolving multicentred problems.