

10 Recommendations

The industrial application of nanotechnologies

- R1 We recommend that a series of life cycle assessments be undertaken for the applications and product groups arising from existing and expected developments in nanotechnologies, to ensure that that savings in resource consumption during the use of the product are not offset by increased consumption during manufacture and disposal. To have public credibility these studies need to be carried out or reviewed by an independent body. (Section 4.5: paragraph 32).
- R2 Where there is a requirement for research to establish methodologies for life cycle assessments in this area, we recommend that this should be funded by the research councils through the normal responsive mode. (Section 4.5: paragraph 33)

Possible adverse health, safety and environmental impacts

The lack of evidence about the risk posed by manufactured nanoparticles and nanotubes is resulting in considerable uncertainty.

- R3 We recommend that Research Councils UK establish an interdisciplinary centre (probably comprising several existing research institutions) to research the toxicity, epidemiology, persistence and bioaccumulation of manufactured nanoparticles and nanotubes as well as their exposure pathways, and to develop methodologies and instrumentation for monitoring them in the built and natural environment. A key role would be to liaise with regulators. We recommend that the research centre maintain a database of its results and that it interact with those collecting similar information in Europe and internationally. Because it will not be possible for the research centre to encompass all aspects of research relevant to nanoparticles and nanotubes, we recommend that a proportion of its funding be allocated to research groups outside the centre to address areas identified by the advisory board as of importance and not covered within the centre. (Section 5.6: paragraphs 55 & 56)
- R4 Until more is known about environmental impacts of nanoparticles and nanotubes, we recommend that the release of manufactured nanoparticles and nanotubes into the environment be avoided as far as possible. (Section 5.7: paragraph 63)

- R5 Specifically, in relation to two main sources of current and potential releases of free nanoparticles and nanotubes to the environment, we recommend:
- (i) that factories and research laboratories treat manufactured nanoparticles and nanotubes as if they were hazardous, and seek to reduce or remove them from waste streams. (Section 5.4: paragraph 41)
 - (ii) that the use of free (that is, not fixed in a matrix) manufactured nanoparticles in environmental applications such as remediation be prohibited until appropriate research has been undertaken and it can be demonstrated that the potential benefits outweigh the potential risks. (Section 5.4: paragraph 44)
- R6 We recommend that, as an integral part of the innovation and design process of products and materials containing nanoparticles or nanotubes, industry should assess the risk of release of these components throughout the lifecycle of the product and make this information available to the relevant regulatory authorities. (Section 5.4: paragraph 42)
- R7 We recommend that the terms of reference of scientific advisory committees (including the European Commission's Scientific Committee on Cosmetic and Non-food Products or its replacement) that consider the safety of ingredients that exploit new and emerging technologies like nanotechnologies, for which there is incomplete toxicological information in the peer-reviewed literature, should include the requirement for all relevant data related to safety assessments, and the methodologies used to obtain them, to be placed in the public domain. (Section 5.3.2b: paragraph 30)

Regulatory issues

- R8 We recommend that all relevant regulatory bodies consider whether existing regulations are appropriate to protect humans and the environment from the hazards outlined in this report and publish their review and details of how they will address any regulatory gaps. (Section 8.5: paragraph 48)
- R9 We recommend that regulatory bodies and their respective advisory committees include future applications of nanotechnologies in their horizon scanning programmes to ensure any regulatory gaps are identified at an appropriate stage. (Section 8.5: paragraph 50)

Recommendations R10 to R14 are based on applying our conclusions - that some chemicals are more toxic when in the form of nanoparticles or nanotubes and that safety assessments based on the testing of a larger form of a chemical cannot be used to infer the safety of chemicals in the form of nanoparticles - to a series of regulatory case studies:

R10 We recommend that chemicals in the form of nanoparticles or nanotubes be treated as new substances under the existing Notification of New Substances (NONS) regulations and in the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) (which is currently under negotiation at EU level and will eventually supersede NONS). As more information regarding the toxicity of nanoparticles and nanotubes becomes available, we recommend that the relevant regulatory bodies consider whether the annual production thresholds that trigger testing and the testing methodologies relating to substances in these forms should be revised under NONS and REACH. (Section 8.3.2: paragraphs 18 & 19)

R11 Workplace:

- (i) We recommend that the Health & Safety Executive (HSE) review the adequacy of its regulation of exposure to nanoparticles, and in particular considers the relative advantages of measurement on the basis of mass and number. In the meantime, we recommend that it considers setting lower occupational exposure levels for manufactured nanoparticles. (Section 8.3.1: paragraph 11)
- (ii) We recommend that the HSE, Department for Environment Food and Rural Affairs and the Environment Agency review their current procedures relating to the management of accidental releases both within and outside the workplace. (Section 8.3.1: paragraph 12)
- (iii) We recommend that the HSE consider whether current methods are adequate to assess and control the exposures of individuals in laboratories and workplaces where nanotubes and other nanofibres may become airborne and whether regulation based on electron microscopy rather than phase-contrast optical microscopy is necessary. (Section 8.3.1: paragraph 13)

R12 Consumer products:

- (i) We recommend that ingredients in the form of nanoparticles undergo a full safety assessment by the relevant scientific advisory body before they are permitted for use in products. *Specifically:* we recommend that industry

submit the additional information on microfine zinc oxide that is required by the SCCNFP as soon as reasonably practicable so that it can deliver an opinion on its safety. (Section 8.3.3: paragraph 24 & 23)

- (ii) We recommend that manufacturers publish details of the methodologies they have used in assessing the safety of their products containing nanoparticles that demonstrate how they have taken account that properties of nanoparticles may be different from larger forms. (Section 8.3.3: paragraph 25)
- (iii) We recommend that the ingredients lists of consumer products should identify the fact that manufactured nanoparticulate material has been added. (Section 8.3.3: paragraph 26)
- (iv) We recommend that the EC's new Scientific Committee on Emerging and Newly Identified Health risks gives a high priority to the consideration of the safety of nanoparticles in consumer products. (Section 8.3.3: paragraph 27)
- (v) In the light of the regulatory gaps that we identify we recommend that the EC (supported by the UK) review the adequacy of the current regulatory regime with respect to the introduction of nanoparticles into consumer products. In undertaking this review they should be informed by the relevant scientific safety advisory committees. (Section 8.3.3: paragraph 28)

R13 We recommend that the Department of Health review its regulations for new medical devices and medicines to ensure that particle size and chemistry are taken into account in investigating possible adverse side effects of medicines. (Section 8.3.4: paragraph 29)

R14 We recommend that manufacturers of products that incorporate nanoparticles and nanotubes and which fall under extended producer responsibility regimes such as end-of-life regulations be required to publish procedures outlining how these materials will be managed to minimise human and environmental exposure. (Section 8.3.5: paragraph 32)

R15 Measurement:

- (i) We recommend that researchers and regulators looking to develop methods to measure and monitor airborne manufactured nanoparticulates liaise with those who are working on the measurement of pollutant nanoparticles from sources such as vehicle emissions. (Section 8.4.2: paragraph 40)

- (ii) We recommend that the Department of Trade and Industry supports the standardisation of measurement at the nanometre scale required by regulators and for quality control in industry through the adequate funding of initiatives under its National Measurement System Programme and that it ensures that the UK is in the forefront of any international initiatives for the standardisation of measurement. (Section 3.3.5: paragraph 60)

Social and ethical issues

- R16 We recommend that the research councils and the Arts and Humanities Research Board (AHRB) fund an interdisciplinary research programme to investigate the social and ethical issues expected to arise from the development of some nanotechnologies. (Section 6.8: paragraph 31)
- R17 We recommend that the consideration of ethical and social implications of advanced technologies (such as nanotechnologies) should form part of the formal training of all research students and staff working in these areas and, specifically, that this type of formal training should be listed in the Joint Statement of the Research Councils'/AHRB's Skills Training Requirements for Research Students. (Section 6.8: paragraph 33)

Stakeholder and public dialogue

- R18 We recommend that the research councils build on the research into public attitudes undertaken as part of our study by funding a more sustained and extensive programme of research into public attitudes to nanotechnologies. This should involve more

comprehensive qualitative work involving members of the general public as well as members of interested sections of society, such as the disabled, and might repeat the awareness survey to track any changes as public knowledge about nanotechnologies develops. (Section 7.2.3: paragraph 19)

- R19 We recommend that the Government initiates adequately funded public dialogue around the development of nanotechnologies. We recognise that a number of bodies could be appropriate in taking this dialogue forward. (Section 7.6: paragraph 49)

Ensuring the responsible development of nanotechnologies

- R20 We recommend that the OST commission an independent group in two and five years' time to review what action has been taken on our recommendations, and to assess how science and engineering has developed in the interim and what ethical, social, health, environmental, safety and regulatory implications these developments may have. This group should comprise representatives of, and consult with, the relevant stakeholder groups. Its reports should be publicly available. (Section 9.6: paragraph 30)
- R21 We recommend that the Chief Scientific Advisor should establish a group that brings together representatives of a wide range of stakeholders to look at new and emerging technologies and identify at the earliest possible stage areas where potential health, safety, environmental, social, ethical and regulatory issues may arise and advise on how these might be addressed. (Section 9.7: paragraph 32)

