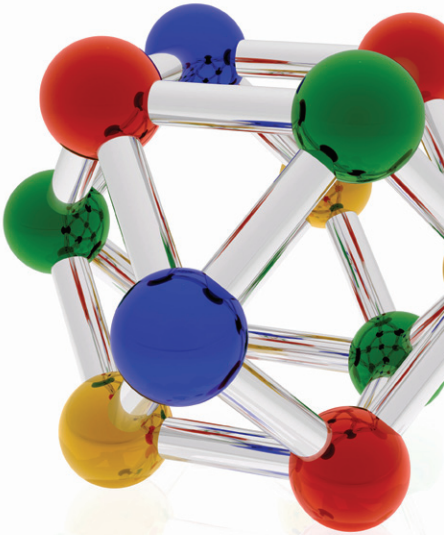
Europe needs safe and innovative nanotechnologies and nanomaterials



Nanotechnologies involve manufacturing and using materials at the smallest scale – they are part of the enabling technologies and processes that span most industry sectors and scientific disciplines.

Our industry associations support the European Commission conclusion that the current European regulatory framework adequately covers nanomaterials, is science-based and proportionate.

We call for a balanced policy on nanomaterials, ensuring the protection of human health and the environment, while providing the necessary framework for enhancing innovation, growth and jobs in Europe.

We wish to highlight the following 7 key points:

Nanotechnologies provide solutions.

Nanotechnologies contribute to solving the important challenges that our society is facing. They provide food sanitation, hygiene, health, water and climate protection for a growing global population in a world where the optimal use of natural resources is a must.

1.

Europe needs nanotechnologies to achieve the goals of the EU 2020 strategy.

European industry believes in innovation as a driver for social, technical and economic progress. Key enabling technologies, such as nanotechnologies, are likely to affect innovation in most industrial sectors and are likely to contribute considerably to future smart, sustainable and inclusive growth. Nanotechnology will also create thousands of new jobs. Current direct employment in the sector is estimated at 300,000 to 400,000 in Europe, a number expected to increase.

2.

Safety is paramount.

European industries initiate and sponsor research into the safety of nanomaterials and nano-enabled products. Significant progress has been made in test methods, data collection and assessments to evaluate any potential risks of nanomaterials in common applications. In this respect, we also believe that nanomaterials are similar to other chemicals/substances in that some may be toxic and some may not be. Evaluation should be on a case- by-case basis. Some nanomaterials – for example, pigments – have been produced for decades, sometimes in high volumes, and their safety well assessed.

3.

Openness and transparency are vital.

Industry supports the European Commission impact assessment on possible measures to increase transparency on nanomaterials on the market. This will ensure a pragmatic approach, taking account of the proportionality principle and the need to protect confidential business information. The impact assessment is the correct vehicle to evaluate the relevance of on-going initiatives to identify if there are further informational needs and to analyse the cost & benefits of establishing any new information tools to supplement existing means. As regards the communication in the supply chain on the use of nanomaterials, we believe that the legislation in place offers the necessary tools, including the REACH provisions – in particular the Safety Data Sheets – for the forwarding of relevant information (hazard, exposure, risk management).

4.

The comprehensive European regulatory framework in place has the capacity to govern the production and use of nanomaterials.

This framework sets the highest safety standards and covers all industry sectors. We therefore support working with the existing legislation and adjust it where required, thereby avoiding double regulation and conflicting requirements. The REACH Regulation provides the best appropriate framework for addressing nanomaterials, and any specific requirements for nanomaterials can be clarified in REACH Annexes and guidance. It is of utmost importance to avoid increasing the administrative burden on companies when clarifying how REACH applies and when adapting legislation to nanomaterials.

5.

A common workable definition system for defining nanomaterials is welcome.

The current European Commission recommendation is a basis for assessing nanomaterials within the regulatory framework. However, its effective implementation still represents a challenge for industry. More work will be needed to ensure consistency, harmonisation and validation of measurement methods both within and outside the EU.

6.

Europe cannot afford to miss out on the opportunities provided by nanotechnologies and the benefits they bring.

Without a positive investment climate for the deployment of nanotechnology in Europe, EU industries will become less competitive. This in turn would also risk giving rise to social, economic and environmental disadvantages for our region from a global perspective. European industries must be competitive in global markets. Some nanomaterials used safely since decades should not be penalized either.

7.

cefic	ESIA European Semiconductor Industry Association	EURATEX
ELC	ACEA European Automobile Manufacturers Association	European Crop Protection
Fecc EUROPEAN ASSOCIATION OF CHEMICAL DISTRIBUTORS	PlasticsEurope Association of Plastics Manufacturers	IMA Europe
European Photocatalysis Federation	EUPC EUROPEAN PLASTICS CONVERTERS	ETRMA EUROPEAN TYRE & RUBBER manufacturers' association
CEPE The voice of paint, printing ink and artists' colours in Europe	NIA Nanotechnology Industries Association	FEICA

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