



28 January 2013

Industry messages on nanotechnologies and nanomaterials

Nanotechnologies involve manufacturing and using materials at the smallest scale – they describe a set of enabling technologies and processes that span all industry sectors and scientific disciplines. The views below are those of several industry sectors.

We, the undersigned industry associations, support the Commission Communication on the 2nd Regulatory Review on Nanomaterials and its conclusion that the current European regulatory framework, providing some clarifications of the requirements, adequately covers nanomaterials, is science-based and proportionate. In addition, we wish to reiterate the following:

1. Nanotechnologies can contribute to solving important challenges of our time, such as providing food sanitation, hygiene, health, water, and climate protection for a growing global population in a world of increasingly scarce natural resources. Nanotechnologies allow the creation of innovative products to support a sustainable society.

2. 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 like nanotechnologies are the prerequisite for smart, sustainable and inclusive growth as well as for the generation of new jobs in Europe. In the 2nd Regulatory Review, current direct employment in the sector is estimated at 300 000 to 400 000 in Europe, with an increasing trend.

3. Safety is paramount. European industries initiate and sponsor research into the safety of nanomaterials and nano-enabled products. Albeit that much care must be taken with sample preparation significant progress has been made in test methods, data collection and assessments to evaluate the potential risks of nanomaterials in common applications. The hypothesis that smaller necessarily means more reactive, and thus more toxic, cannot be substantiated by the published data. In this respect, nanomaterials are similar to normal chemicals/substances in that some may be toxic and some may not be. Thus, a case-by-case evaluation is recommended.

4. Openness and transparency are key. Industry pursues and participates in all relevant stakeholder dialogues at national and European level. The Staff Working Paper of the 2nd Regulatory Review gives an overview of applications of commonly used nanomaterials in the market. Further information needs have to be assessed before any targeted information system is implemented. We therefore support the impact assessment proposed by the Commission in order to ensure a pragmatic approach that takes into account the proportionality principle and the need to protect confidential business information.

5. A comprehensive European regulatory framework is in place that has the capacity to govern the production and use of nanomaterials. This framework sets the highest safety standards and covers all industry sectors. For example, REACH is the appropriate framework to address nanomaterials, and any specific requirements for nanomaterials can be clarified in REACH Annexes and guidance. Industry will continue to engage in discussions on nanomaterials in the regulatory context.

6. A common workable definition for nanomaterials is welcome. The current EU Commission recommendation is a basis for assessing nanomaterials within the regulatory framework taking into account the possibility of focusing the scope of the definition for certain sectors. However, its implementation still represents a challenge for industry. For effective implementation, more work is needed to ensure consistency, harmonisation and validation of measurement methods within and outside the EU.

7. Europe cannot afford to miss out on the opportunities provided by nanotechnologies and the benefits they enable. To do so would result in social, economic and environmental disadvantages for our region.