

Environmental Defense and American Chemistry Council Nanotechnology Panel

Joint Statement of Principles

Comments on EPA's Notice of a Public Meeting on Nanoscale Materials
70 FR 24574 – Docket OPPT-2004-0122
23 June 2005

Nanotechnology applications promise significant societal and sustainable development advancements, many that could provide direct environmental benefits. Nanotechnology products offer, for example, the potential for improved energy production, environmental remediation, and solar power production, among many other benefits. But it is also important to identify and better understand nanotechnology's potential risks up front to ensure protection of health and the environment, particularly in light of initial studies demonstrating that some nanomaterials have hazardous properties.

The U.S. Environmental Protection Agency's May 10, 2005, *Federal Register* notice announces the scheduling of a public meeting and seeks information on a potential "voluntary pilot program" on nanoscale materials. Without taking a joint position on the merits of such a program, Environmental Defense and the American Chemistry Council Nanotechnology Panel agree on several fundamental principles on which a governmental program for addressing potential risks of nanoscale materials should be premised.

We believe:

- Some applications of nanomaterials are expected to offer significant societal and sustainable development benefits.
- The timely and responsible development and regulation of nanomaterials in an open and transparent process will best assure that nanomaterials are being developed in a way that identifies and minimizes potential risks to human health and the environment.
- A multi-stakeholder dialogue that includes all interested parties, including small businesses, labor, community organizations, and consumer advocates as well as large businesses and environmental organizations, will best assure the development of an effective program for nanoscale materials.
- A significant increase in government investment in research on the health and environmental implications of nanotechnology is essential.
- The development of an international effort to standardize testing protocols, hazard and exposure assessment approaches, and nomenclature and terminology is an important step to maximize resources and minimize inconsistent regulation of nanomaterials.

Joint Statement of Principles

June 23, 2005

Page 2

- Elements of safe and responsible development of nanotechnology should include appropriate protective measures while more is learned about potential human health or environmental hazards.

- A government program should address intentionally produced nanoscale materials produced in or imported into the U.S. and characterize hazard and exposure sufficiently to assess any risks of these materials. It should also assess the appropriateness of or need for modification of existing regulatory frameworks.

###