

Nanomaterials

Background

The development of novel materials is critical to the UK's long-term growth and sustainability agenda since they underpin the very future of cars, aerospace industry, communications, energy efficient products, energy industry, medical and food industries. The Chemical Industries Association (CIA) and its members firmly believe they can be produced in the UK in a responsible and safe manner, as is the case with any other chemical substance.

CIA thereby seeks a positive investment climate for encouraging nanotechnology growth in the UK (and Europe). Existing regulations can and should be used to help facilitate this growth.

CIA is working closely with UK government and other stakeholders to make the UK an attractive and sustainable place for nano research, commercialisation and addressing regulatory aspects.

Current Status

- The European Commission is undertaking a review of its recommendation for a nanomaterial definition for use in environment and product legislation.
- A legislative proposal put forward by the European Commission for modifying the REACH Annexes for nanomaterials is being discussed by Member States.
- Some Member States have/are in the process of implementing national inventories and the European Chemicals Agency has developed and maintains an EU web-based information observatory <https://euon.echa.europa.eu/>.

Our opinions and actions

- Nanomaterials are similar to other chemical/substance forms in that some may be toxic and others are

not. Their size alone does not indicate a step-change in hazard.

- We believe existing regulations are suitable to manage any potential risks from nanomaterials, as they are for other chemical substances. Additional specific guidance in REACH Annexes should be well designed to clarify how to manage potential risks while not undermining innovation and competitiveness.
- In 2014, the trade unions and employers in the European chemical industry signed a joint declaration setting out the importance of nanomaterials and stating that the right legislative framework is through REACH.
- EU's current nanomaterial definition is not practical because of uncertainty in measurement techniques for number size distribution. CIA would like to see a more practical and limited definition that is related to the normal mode of use. We also believe standardised measurement methods need to be in place before any changes to REACH Annexes are implemented.
- CIA believes it is important for industry that any changes to the REACH Annexes retain flexibility to allow grouping especially in the context of different nanoforms of the same substance and that ECHA's guidance enables this.
- We believe the way forward for modifying the REACH Annexes is to use a concern-driven integrated approach, whereby a substance is first checked to see it meets the nanomaterial definition and if so, whether the physicochemical properties together with information on use and exposure give any cause for potential concern. Identified nanomaterials with a potential concern would then be required to

undergo further tiered and targeted testing. Efficiency of testing should be maximised by appropriate grouping of materials and use existing data.

- We do not believe national inventories are beneficial to either the EU economy or European citizens. For the same reason we do not believe the establishment of a separate EU nanomaterials inventory is the right way forward.
- CIA supports the EU Observatory on nanomaterials. Notification of nanomaterials to current regulatory schemes can then be clearly listed on the web platform; this includes information on nanomaterials used in food, cosmetics, medical devices, biocidal products as well as substances submitted under REACH (once Annexes are adapted for nanomaterials) and CLP. With this in place, we see no need for either an EU register, and/or national inventories, on top of existing regulatory requirements.

CIA currently leads the Nanotechnologies Supply Chain Forum, which comprises UK trade associations and Government officials. The Forum works to establish the right business environment and regulatory framework for the successful commercialisation of nanotechnologies in the UK.

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