



National Toxics Network Inc.

working towards pollution reduction, protection of environmental health and environmental justice for all

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Senator the Hon. Kim Carr
Minister for Innovation, Industry,
Science and Research

senator.carr@aph.gov.au

RE: 'Nanotechnology Social inclusion and engagement workshop'

Dear Minister

The National Toxics Network (NTN) notes that the Australian Office of Nanotechnology (AON) will host a 'Nanotechnology social inclusion and engagement workshop' on the 1st December 2008.

NTN has only recently been made aware of the workshop as a result of Friends of the Earth alerting us to it. They have also provided us with a draft copy of the proposed agenda.

NTN is actively involved in international discussions on nanotechnology and has been working closely with other groups in Australia. As Australia's only NGO working on toxic pollution issues nationally and internationally, it seems somewhat remiss not to have included NTN as a participant in this important workshop, especially as the stated theme of the workshop is 'social inclusion and engagement'.

Nanotechnology in the form of nanochemistry and nanomaterials has direct links and implications for toxic pollution, particularly in relation to persistent organic pollutants (POPs) such as perfluorochemicals and other toxic chemicals like metals, which are already being included in nanomaterials.

The proposed structure and agenda for the AON workshop raises some serious concerns. In the first instance, we believe key groups identified as working on nanotechnology have been left off the participant list, including NTN, the Biological Farmers Association and the Genetics Network to name a few examples.

Secondly, the agenda, as it stands seems to be about different stakeholders (industry, government, researchers and community groups) having better dialogue with each other, rather than a government proposal for an inclusive and direct public engagement on nanotechnology, which at this stage of the debate we believe would be more appropriate.

In 2003, the UK Government commissioned an independent study by the Royal Society, and the Royal Academy of Engineering, of likely developments and whether nanotechnology raises, or is likely to raise new ethical, health and safety or social issues which are not covered by current regulation.

One of their conclusions, in relation to the importance of promoting wider dialogue, was to recommend that government communicate with and involve the public in decision-making in relation to nanotechnology.

The authors pointed to a 'crisis of trust' in areas of science policy-making because of the approach of government to view engaging with the public as an optional add-on, rather than an integral part of the process.

While nanotechnology offers enormous potential in many fields of research and application, we believe its general release to the community and environment without any hazard assessment or regulatory framework is irresponsible. It may also serve to undermine future beneficial uses of the technology in much the same way ' Frankenfoods ' has set back potentially useful applications of genetic engineering.

As I'm sure you are aware, novel nanomaterials are already in the workplace and people's homes and we are potentially being exposed to them from a variety of personal care products and household items such as food storage containers and washing machines. Of particular concern is nanomaterials in sunscreens which are extensively used in Australia.

It is acknowledged by eminent scientists and researchers around the world that there are potentially great risks from exposure to nanomaterials, which result from their high surface reactivity and ability to cross cell membranes, creating increased toxicity.

There are well-founded concerns about the risks of nanomaterials which may lodge in the lungs and cause serious health effects like those associated with asbestos and particulate air pollution.

Like all technologies hailed as 'the future', the rush to get nanotechnology onto the market has once again largely left the public behind without protection or opportunity to engage in the debate.

We urge you to reconsider your approach to consultation on nanotechnology and to ensure a process that provides a genuine opportunity for the broader public to be included and engage in this very important debate.

Yours sincerely

JO IMMIG

National Coordinator