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p. 32. Goal 3.1 “Sustain outreach and informal education program in order to inform the public about the opportunities and impact of nanotechnology” needs to be amended to include “risks”. Research has shown that consumers who are not provided information about the risks of new technologies at the same time as the benefits of the technologies end up with more negative views when they later learn of problems. The reference to “safe handling of ENM in the laboratory” is not enough. The education about risks needs to include the entire lifecycle of the products and their precursors.

p.35 Goal 4 on the “responsible development of nanotechnology” recognizes the need for research on the lifecycle effects of the development of nanotechnology, including human health and environmental effects, but stops short of calling for greatly increased research in these areas. Calling it an area for “increased emphasis” and “high-priority” without a great increase in funding by agencies is disingenuous. This is the lowest area of funding for NNI agencies over the last 10 years, the next 5 years needs to see a GREAT increase in funding.

p.39. Again the draft talks about how “New research will assess and promote sustainability of NEPs and ENMs and [will] integrate sustainability in the[ir] design, development and manufacture. It needs to give some examples of the kinds of thing that sustainable development is trying to avoid. What are those risks? Nanotechnology and its products in this discussion is ALL GOOD and ALL POWERFUL. No technology is all good or all powerful, don’t oversell it in your plan,.

p.50 Table 3 makes clear that only 8 of 20 NNI agencies have given EHS any primary focus. Several others such as the DOE, NASA, and ITC are actively promoting nanotechnologies, but apparently do not have any focus on the environmental or health effects of these technologies.

p.55 discusses the NEHI Working Group and notes that part of its agenda is communicating with the public, but fails to discuss how it will do that in the future. Several of these agencies have not responded to our organization’s attempt to get information. In one case(FDA), we had to sue after the agency failed to respond to a legal petition for 6 years.

p.57 notes that the Office of Management and Budget is responsible for the budget of NNI agencies. It would be helpful to include this budget in this plan or at least link to it. The proposed EHS budget for 2014 is essentially unchanged from 2013, but because other parts of the NNI get more increases, EHS spending actually declines from 7.28 percent to 7.1 percent of the budget.

p.68. I participated in the Stakeholder Workshop and was in the subsection on EHS issues which included 68 of the 120 participants. It seems that the recommendations from that workshop have not been integrated into this document. Please go back and incorporate them into the next draft. Likewise, the comments of Dr. Herr-Hartshorn are incorporated into the plan.

I would have had more comments, but I am following your one page limit.