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Dear Cate Alexander Brennan,

Unfortunately it is not possible to attend the meeting you mentioned in your email from yesterday, but I follow your invitation to give a written comment. Your document summaries all the fields that needs further research and evaluation. congratulations !

The current situation concerning a German research strategy is as following. The draft, initiated and coordinated by BAuA is a joint draft of 3 Federal Institutes, covering chemical safety of workers, consumers and environment. The draft is supported by the respective ministries. We asked experts to comment it. End of November we discussed the draft with stakeholders (industry, NGOs etc). In the beginning of the next year we want to finalize it. Since on OECD-level "Research strategy" is a topic of a specific working group, member states were asked to send their activities (strategies, research plans) concerning this point. Colleagues from OECD told me that the response was quite meagre up to now. OECD-activities concerning nanotechnology is one of the central fields to enable a global cooperation. In our draft some priority setting is mentioned and we are working on a more detailed approach, at present I'm not sure whether a strict sequential procedure of research projects is realistic and reasonable.

Some objectives from our strategy (taken from a recent presentation):

- Concrete description of topics, structuring, priority setting
- Coordination and exchange with ongoing and envisaged projects (more transparency is needed, nobody knows in detail what the other do)
- Development of a national strategy: input in EU- und OECD-discussion (several OECD-groups have been founded)
- European and international cooperation
- Risk related approach:
Substances with many exposed people and indications of toxicity are of priority to be tested
- Consideration of the acts and regulations on chemical substances
Consideration of the respective guidance documents on testing and assessment (EU, OECD)
- Not only fundamental research, but exposure limits, classification/labelling, comprehensive risk assessments, practical recommendations are necessary
- Clarification, whether toxicologically different substances are summarized among one CAS-Nr.
- Positioning and participation of federal institutes with competence in the field of chemical safety

The above aspects are not sufficiently considered in the ongoing research activities. As a consequence, let me finally add one point that is, in my view, of high importance for the research activities of Federal Institutes, at least in Germany. A lot of funds are available to perform research on health and environmental effects of Nanotechnology. However a main problem is that these funds are not administrated by the departments and Federal Institutes for workers, consumer and environment safety. So as a clear strategic and political implication, it is necessary to transfer considerable funds to the above mentioned Federal Institutes to consider their experience and expertise in a straightforward and uncomplicated research approach. At least research projects should be selected in close collaboration with the mentioned institutions. Based on a recent publication I had the impression that in USA the interests of Federal Institutes are not considered sufficiently, too.

A link to our draft strategy is attached.

http://www.baua.de/en/Topics-from-A-to-Z/Hazardous-Substances/Nanotechnology/Nanotechnology.html__nnn=true

Best regards/Mit freundlichen Grüßen

Bruno Orthen

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