Position statement on Nanomaterials

March 2016

I&P Europe – Imaging and Printing Association is a European association of product manufacturers and technology providers for the imaging and printing industry. Our members' products include conventional and digital materials and their processing solutions.

Nanomaterials are under intensive discussion for several years. In particular it is being discussed on a worldwide basis whether nanomaterials are regulated sufficiently and how an appropriate regulation could look like. In the EU the European Commission published its recommendation on the definition of "nanomaterial" for regulatory purposes on 18 October 2011. Currently the Commission is conducting a review which is expected to be finalized in 2016.

In view of the ongoing discussions **I&P Europe's position is the following:**

- There is no need for new specific regulation for nanomaterials. The application of existing regulation is seen as sufficient, albeit with the necessary adaptations/extensions to the REACH annexes.
- A clear and precise definition should be developed. Already now the EC Recommendation 2011/696/EU on the definition of nanomaterials, while imperfect, offers the best opportunity to identify nanomaterials in a reasonably clear and consistent way, despite the remaining uncertainties with respect to this definition which hopefully will improved in the future.
- New recognized measurement methods should become in place in view of monitoring and determination of compliance.
- There is no need for (national) product inventories, including relevant notification requirements. It is seen as appropriate to wait for the outcome of the Commission's impact assessment for the need to register. If needed, any regulation in this regard should be done at the European level rather than the national level to achieve a harmonized information gathering process and to avoid unnecessary administrative burdens. Provision by national authorities often results in varied interpretations that are difficult to manage, especially across multinational operations.

Motivation:
I&P Europe believes that the **current European framework regulation (REACH) is more than capable of assessing the (possible) risks that are associated with (manufactured) nanomaterials**, albeit with the necessary adaptations/extensions to the annexes. Worker safety is currently improved by restrictions on marketing and use (REACH Annex XVII) and it is entirely appropriate to target specific chemicals, including specific nanomaterials, which are demonstrated to pose a risk to humans and/or the environment. In the absence of such evidence, general guidance on risk assessments and the safe use of nanomaterials is the most appropriate route forward.

Mainzer Landstrasse 55
60329 Frankfurt am Main
Germany

e-mail: info@ip-europe.com
Internet: www.ip-europe.com

Phone +49 (0) 69/25 56-14 10

Imaging and Printing Association
I & P Europe

Risk management legislation and chemicals legislation already place many stringent requirements on companies to ensure good standards of worker health and safety. It is our opinion that additional legislation does not need to specifically refer to nanomaterials or nanotechnologies in order for the risks to be managed. Already today worker safety and risk management measures are applied for all chemicals, including nanomaterials. Such risk assessments of chemicals include their hazards, physical state, particle size and exposure. This automatically takes into account the properties of nanomaterials. According to the Commissions 2nd regulatory review, nanomaterials are similar to other substances in that some may be toxic and some may not.

Specifically targeting nanoparticles legislation is more likely to introduce unnecessary restrictions on safe technologies than to improve the safety of a few specific materials which might actually pose an increased risk due exclusively to their particle size or surface properties. When there are uncertainties, the application of Responsible Care is recommended. Any legislation that specifically covers nanomaterials will have to be treated separately and in addition to other worker legislation which already covers the risks. This will inevitably lead to an increased level of activity, resources and cost without added value.

Without question I&P Europe member companies are committed to the safety of their products which may contain nanomaterials. The only debatable question is how this can be achieved in an effective and efficient way. In our industry, certain nanomaterials have been used for decades, whereby eventual arising hazards and risks are adequately managed

I&P Europe wants to emphasize again that it believes that the majority of tools for hazards identification and risk assessment are already available. Only fine tuning needs to be implemented to get standardized protocols for identification of individual nanomaterial properties and assessment of their (eco)toxicological profile. Furthermore where needed a single EU-wide registry would be preferable to multiple national registries which multiply the burden on companies several times over and create additional difficulties within the EU.

Mainzer Landstrasse 55
60329 Frankfurt am Main
Germany

e-mail: info@ip-europe.com
Internet: www.ip-europe.com

Phone +49 (0) 69/25 56-14 10