



Nanoreg: Towards a harmonized approach to NM regulation

Blanca Suarez-Merino DPhil

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Nano products



Regulation needs to keep pace with innovation!







VS

Some Australians Prefer Skin Cancer to Sunscreens with Nanoparticles By Dexter Johnson Posted 10 Feb 2012 | 18:09 GMT

EU votes for labels on nano, cloned and GM food Ecologist

Sth May, 2010

UK and other member states expected to fight proposals to bring in compulsory labelling for consumers on novel foods MEPs have voted almost unanimously in





What we know...



Biokinetics of nanoparticles. Diseased or compromised organisms where not considered.

Oberdorster et al 2005.



European Comunity Regulation on Chemicals (REACH)

Is the European Community Regulation on chemicals and their safe use <u>(EC 1907/2006)</u>. It deals with the **R**egistration, **E**valuation, **A**uthorisation and Restriction of **Ch**emical substances. The law entered into force on 1 June 2007.

- a. Improve the protection of human health and the environment
- b. Enhance innovation and competitiveness of the EU chemicals industry
- c. Transparency
- d. Avoid unnecessary animal experimentation



Toxicity studies with nanoparticles according to the REACH regulations have not been validated for nanoparticles. These are being looked at by European authorities so nanoparticles could be evaluated for safety as any ordinary chemical product. Major problem is adapting dosage.



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• RIPoN reports

REACH Implementation Project on Nanomaterials (RIPoN), which it intended to provide advice on key aspects of the implementation of REACH with regard to nanomaterials. They are REACH annexes.

- RIPoN 1: Substance identification
- RIPoN 2: Information requirements
- RIPoN 3: Chemical Safety Assessment



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Harmonization:

To obtain good quality, reproducible data

To avoid unnecessary/duplicative data

Save testing resources



Experimental results may be accepted by all OECD countries

To achieve harmonization of manufactured nanomaterials:

Working party on manufactured nanomaterials (WPMN) was created in 2007 (OECD)

To address whether existing Guidances' (TG) are adequate to nanomaterials

115 test guidelines have been reviewed



Results:

•Amendments to the Inhalation Test Guidelines and Guidance to Accommodate Nanomaterials

- Guidance Document on Aquatic Toxicology Testing of Nanomaterials
- Test Guideline for the Dissolution Rate of Nanomaterials in the Aquatic Environment
- Guidance Document for Dispersion and Dissolution of Nanomaterials in Aquatic Media Decision Tree
- •Guidance Document on Assessing the Apparent Accumulation Potential of Nanomaterials
- Test Guideline for Dispersibility and Dispersion Behaviour of Nanomaterials in Aquatic Media
- Development of a Draft Test Guideline for Nanomaterial Removal from Wastewater
 Physical-Chemical Parameters: Measurements and Methods
- •Categorization of nanomaterials
- Interlaboratory study on colony forming efficacy test



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EXAMPLE: CARBON NANOTUBES

Dimensions 0.5-2µm x 1-2 nm



Toxicology evaluation

Size? Length? Catalyst? Pristine nanomaterials Functionalized nanomaterials?

NEW DISCIPLINE: NANOTOXICOLOGY

Costs in EEUU: >249 millions of \$ 34-53 years

Identify characteristics and

Tests to predict toxicity

Safe by design





Common European approach to the regulatory testing of nanomateria



'common' and 'regulatory' relevant





Links to regulatory questions

- Link to regulatory questions:
 - Q2 & Q3 Measurement, characterization & transformation
 - Q4 & Q5 Metrology, dose metrics, extrapolation & grouping
 - Q6 & Q7 Fate, kinetics, persistence and long-term effects
 - Q9 & Q10 Hazard & mode of action

Potential impact:

 Strategic use of solubility, predictive in vitro toxicity assessment and high throughput screening methodology within the risk assessment of nanomaterials

Possible implementation:

- Within the NANoREG toolkit for risk assessment and decision making instruments for the regulators
- Within REACH guidance for testing requirements
- Within OECD test guidelines
- International cooperation: OECD WPMN, other research projects such as MARINA, NanoMILE, CEFIC-LRI project on grouping etc.



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OUTCOMES OF PREVIOUS ACTIVITIES

- Similarities and Extrapolation
 - ✓ Development of a proposal for grouping of nanomaterials in categories with similar biological, ecological and/or toxicological effects
- Stability and Elimination
 - \checkmark Development of a strategy for solubility testing
- Alternative Testing and Predictive Screening
 - ✓ Development of an alternative predictive screening methodology
- Decision Tree for Risk Assessment
 - ✓ Development of a decision tree for risk assessment based on results from experimental workpackages and points mentioned above



Acute vs subchronic (multidose) exposure of airway epithelia to CeO2 NM

Traditional MTT assay (72 hours)



ex-vivo exposure (90 days)





■ Control ■ Dextran 70 ■ 0,001 mg/cm2 ■ 0,01 mg/cm2 ■ 0,1 mg/cm2



NANoREG – A common European approach to the regulatory testing of nanomaterials





Development and implementation of grouping and safe by

design approaches within regulatory frameworks



sale innovation approach



Safe by Design	FROM UNCERTAINTIES AND POTENTIAL RISKS TOWARDS CERTAINTY AND MANAGED RISKS			
	Uncertainty and risk			
Regulatory Preparedness	FROM SHARING EXPERTISE AND KNOWLEDGE WITH INNOVATORS TO IDENTIFY UNCERTAINTIES AND POTENTIAL RISKS TOWARDS GUIDANCE FOR REGISTRATION OR MARKET APPROVAL			
Safe Innovation Approach				





Development and implementation of grouping and safe by design approaches within regulatory frameworks



Work plan







Centro de Competencias en nanotecnologias



- EHS advance nanoBasque *





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