



RISK  
GONE



# Challenges in organisation & research of risk governance of Nanotechnologies

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**6TH SAFERA Symposium *Safety in the new economy and energy transition***

***May 19, 2022***



NANORIGO: Grant N°814530

RiskGONE: Grant N°814425

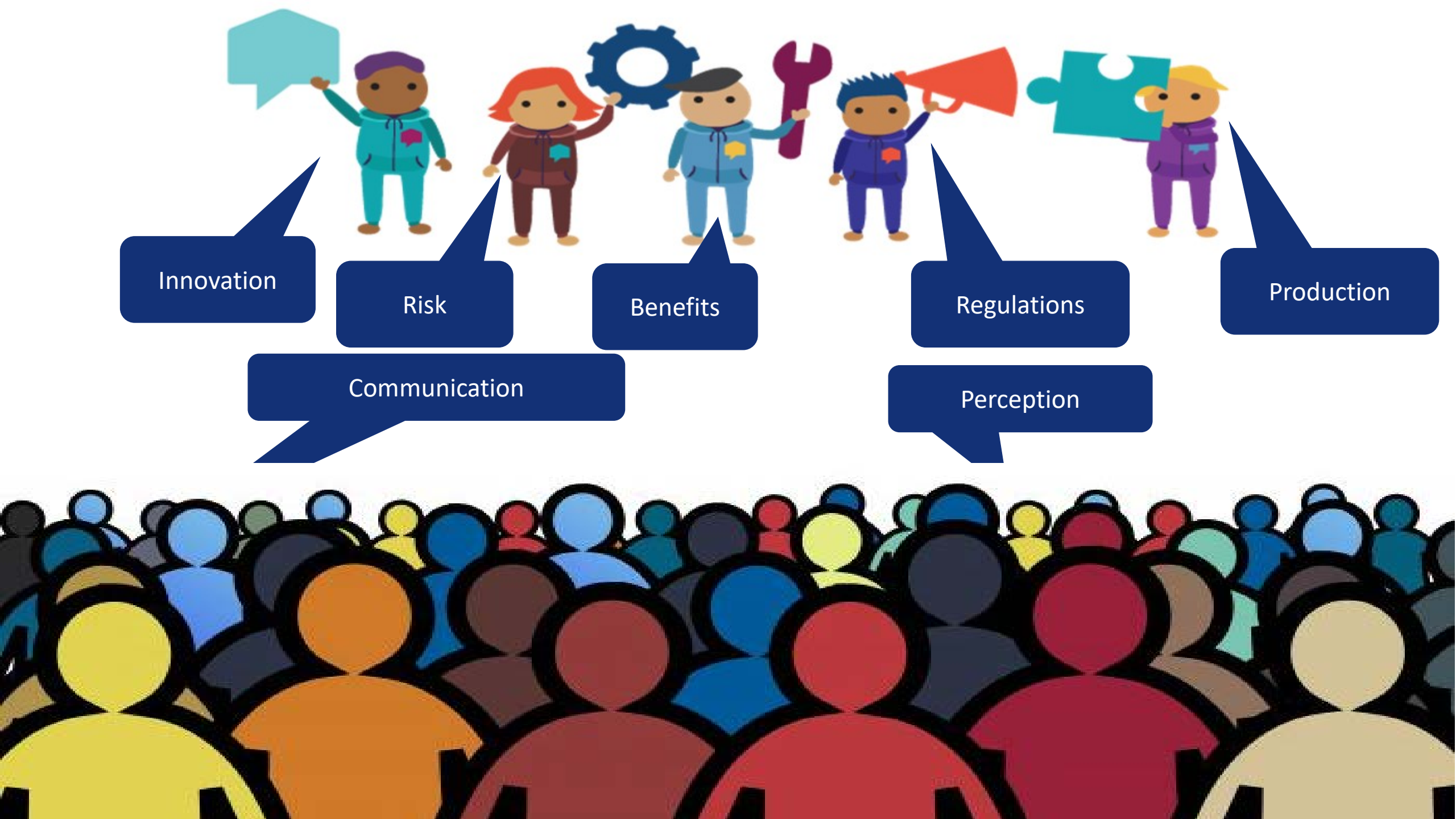
Gov4Nano: Grant N°814401

# Content

- Short introduction Risk Governance
- State of the art in EU research on Nano Risk Governance
  - NMBP-13 projects: expected impact and results
- Changing policy ambitions: green deal and Chemical Strategy for Sustainability, new demands for nanotechnology
- Regulatory Research needs: results of two Gov4Nano summits

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# Governance



# Risk governance

**Governance** refers to the actions, processes, traditions and institutions by which authority is exercised and decisions are taken and implemented.

- Involves **Multi-disciplinary** sciences and
- **multi-stakeholder** approaches
- A FRAMEWORK for risk governance is based on a defined and structured **process** to addressing **risk** in a comprehensive and holistic manner
  - Identification
  - Assessment (hazard, exposure, vulnerability)
  - Evaluation of acceptability, decision-making
  - Management and regulatory-relevant recommendations
  - Communication of risks

# There exist already many 'frameworks' and tools, primarily for risk and safety assessment of nanotechnology



## NEWS AND OPINIONS

### A unified framework for nanosafety is needed

Janeck J. Scott-Fordsmand <sup>a,\*</sup>, S. Pozzi-Mucelli <sup>b</sup>, L. Tran <sup>c</sup>, K. Aschberger <sup>d</sup>, S. Sabella <sup>e</sup>, U. Vogel <sup>f</sup>, C. Poland <sup>c</sup>, D. Balharry <sup>g</sup>, T. Fernandes <sup>g</sup>, S. Gottardo <sup>d</sup>, S. Hankin <sup>c</sup>, M.G.J. Hartl <sup>g</sup>, N.B. Hartmann <sup>d,1</sup>, D. Hristozov <sup>b</sup>, K. Hund-Rinke <sup>h</sup>, H. Johnston <sup>g</sup>, A. Marcomini <sup>b</sup>, O. Panzer <sup>i</sup>, D. Roncato <sup>j</sup>, A.T. Saber <sup>f</sup>, H. Wallin <sup>f</sup>, V. Stone <sup>g</sup>



### A framework for sustainable nanomaterial selection hazard, a

Mark M. Falinski <sup>1</sup>, and Julie B. Zimmer

Engineered nanomaterials selection hazard, a



## RISK GOVERNANCE AND RESEARCH & INNOVATION PRIORITIES IN NANOTECHNOLOGIES

FIRST BRIEFING REPORT WITH A FOCUS ON FOOD, HEALTH AND THE ENERGY SECTOR



Home Events Nano-Risk Governance Portal NanoSafety Cluster Week Partners Results Reso

News / Get involved: Test risk governance models

### Get involved: Test risk governance models

Are you involved in activities concerning R&D, production, marketing, use, risk assessment and management, inspection, insurance, etc. caLIBRAte invites you to get involved in the project and test one of the models identified as potentially suitable:

- Nanosafe Control Banding
- GUIDEnano
- LICARA nanoscan
- BAUA Sprayexpo 2.3
- Stoffenmanager Nano
- ANSES CB Nanotool
- Control banding nanotool
- Precautionary Matrix
- ISO / TS 12901-2
- ConsExpo Nano
- SimpleBox4Nano (SB4N)
- SUNDs

The caLIBRAte framework will link different nano-specific models and methods into a system-of-systems (SoS), which companies can use for the assessment, prioritisation and management of occupational, consumer and environmental risks associated with production and use. The models will be aligned to support decisions along the research and innovation value chain, from basic research to market launch.

# So, what else do we need?

## Framework for nanotechnology risk governance

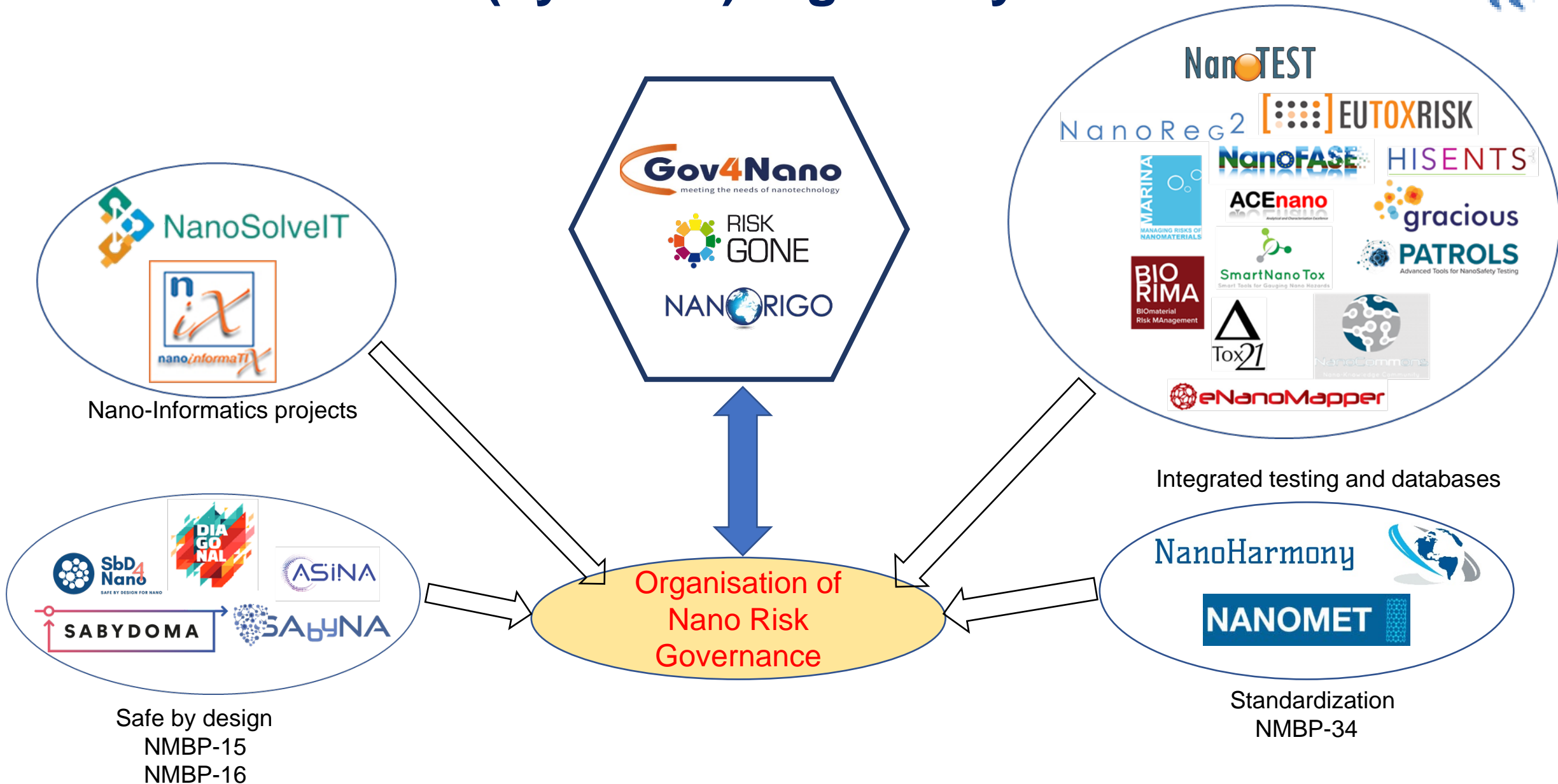
1. **Integrate** important concepts, principles and tools
2. Access to **data** and guidance on how to obtain high quality data / outcome of knowledge-based risk assessment
3. Access to **tools** for risk assessment and risk management
4. Provide recommendation on **responsible** and transparent communication between **stakeholders**
5. Support to identify future scientific and regulatory research needs: address **current as well as future challenges**



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# Research work in (dynamic) regulatory context



# Societal challenge

- Nanotechnology has high economic potential and thereby impacts a broad range of industries and applications
- Interaction of engineered nanomaterials with the living environment is complex and is marked by uncertainty and ambiguity
- Urgent need to develop appropriate risk governance structures, to ensure full potential through trust of all stakeholders



- €8.6M budget
- 01/19 to 12/22
- 32 partners
- 15 countries
- Coordinated by RIVM (NL)
- Grant agreement No. 814401

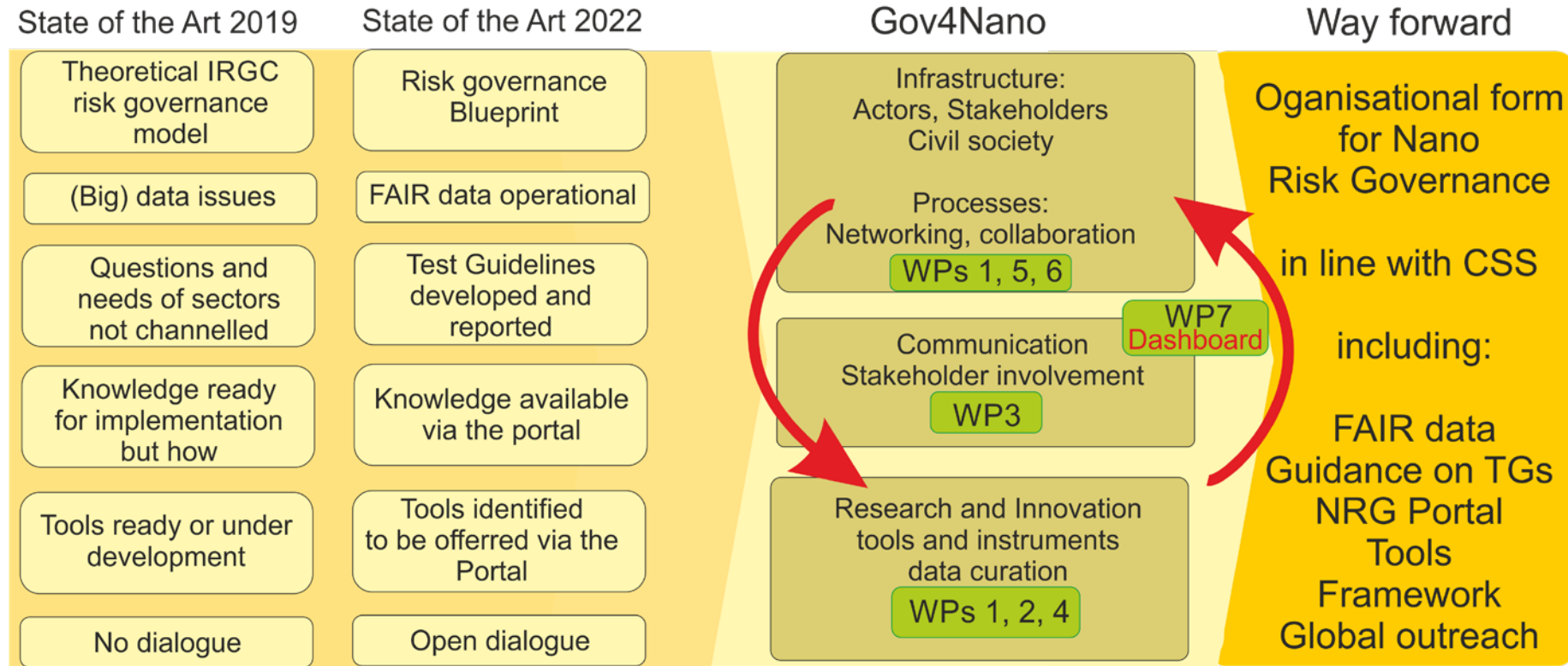


- €4.7M budget
- 01/19 to 02/23
- 28 partners
- 14 countries
- Coordinated by Aarhus (DK)
- Grant agreement No. 814530



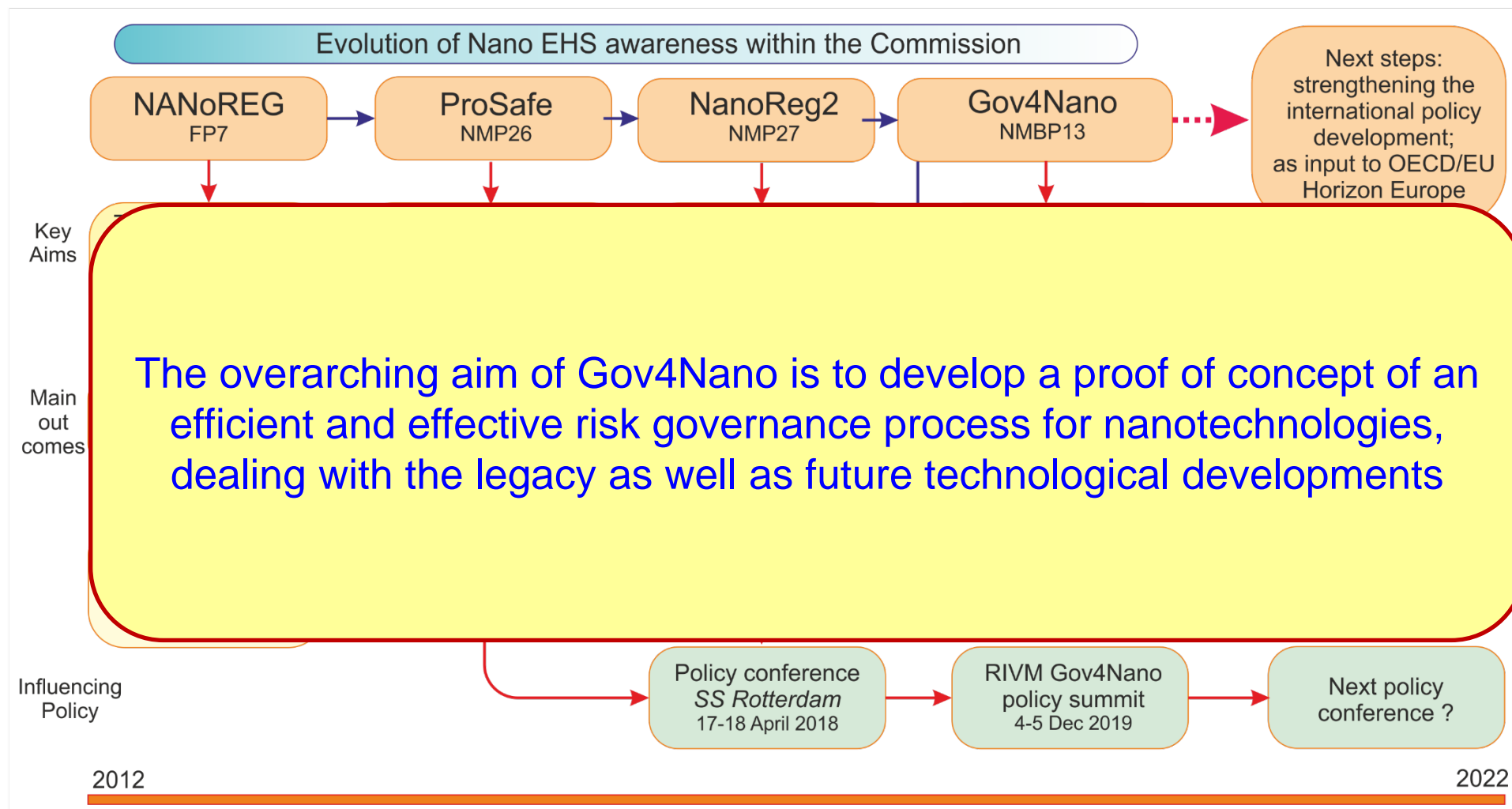
- €5M budget
- 01/19 to 02/23
- 22 partners
- 17 countries
- Coordinated by NILU (NO)
- Grant agreement No. 814425

# Setting the scene: the need for Gov4Nano

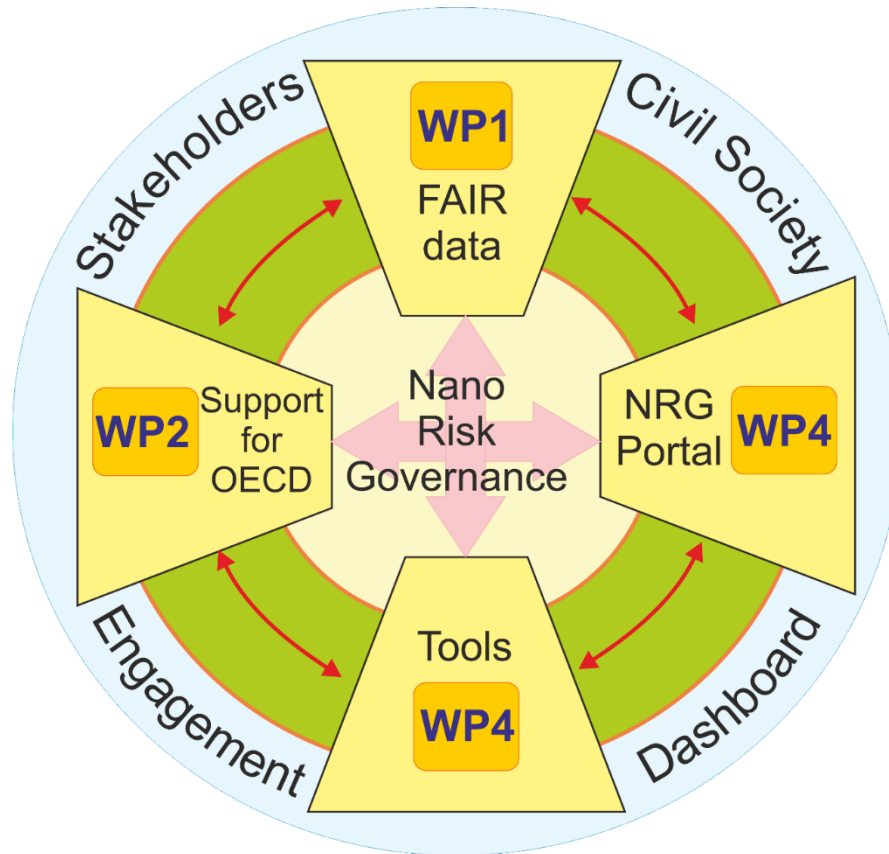


Agile and adaptable: meeting the changing needs of society

# The process to Gov4Nano and the aims



# Key building blocks for Nano Risk Governance



- **Cover all domains:** chemicals, biocides, consumers, food, medicine
- **Connect** key organizations and stakeholders (EU and global)
- **Integrate** important concepts, principles and tools
- Access to **data** and guidance on how to obtain high quality data
- Access to **tools** for risk assessment and risk management
- Support to identify future scientific and regulatory research needs
- Address **current & future challenges**
- **Responsible** and **transparent** communication between **stakeholders**

# Outcome

- Proof of concept of an effective risk governance process
- Operational Nanotechnology Risk Governance Framework
- Nano Risk Governance Portal
- Blue print for an organization for Nano Risk Governance





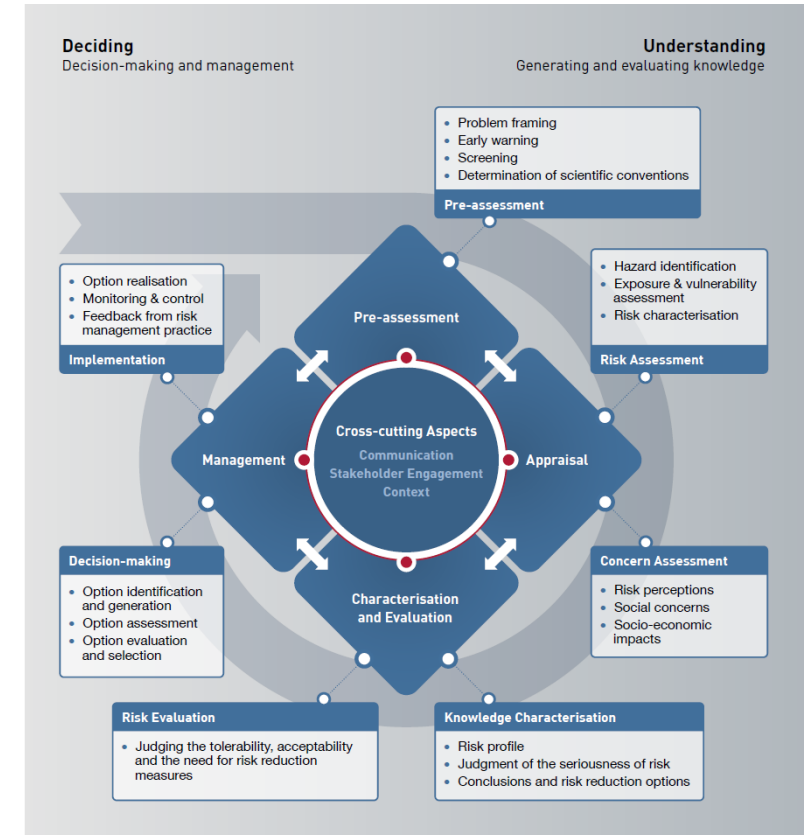
Organisation for  
Nano  
Risk  
Governance

Risk Governance  
Framework for  
decision making

Supporting  
Infrastructure  
data, tools &  
instruments

# Nano Risk Governance Framework

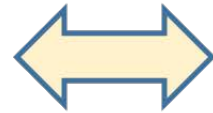
- All domains: chemicals, biocides, consumers, food, medicine
- Connecting key organizations and stakeholders (EU and global)
- Decision making framework
- Future-proof based on International Risk Governance Council
- Integrates scientific data and operational tools
- Participative and pro-active role for stakeholders
- Based on existing risk governance infrastructure



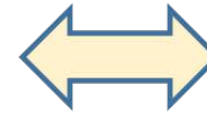
<https://irgc.org/risk-governance/irgc-risk-governance-framework/>

# Nano Risk Governance Framework

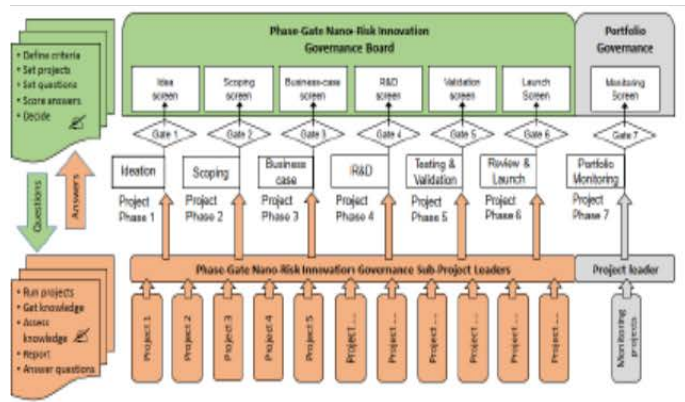
Validated framework  
and tools



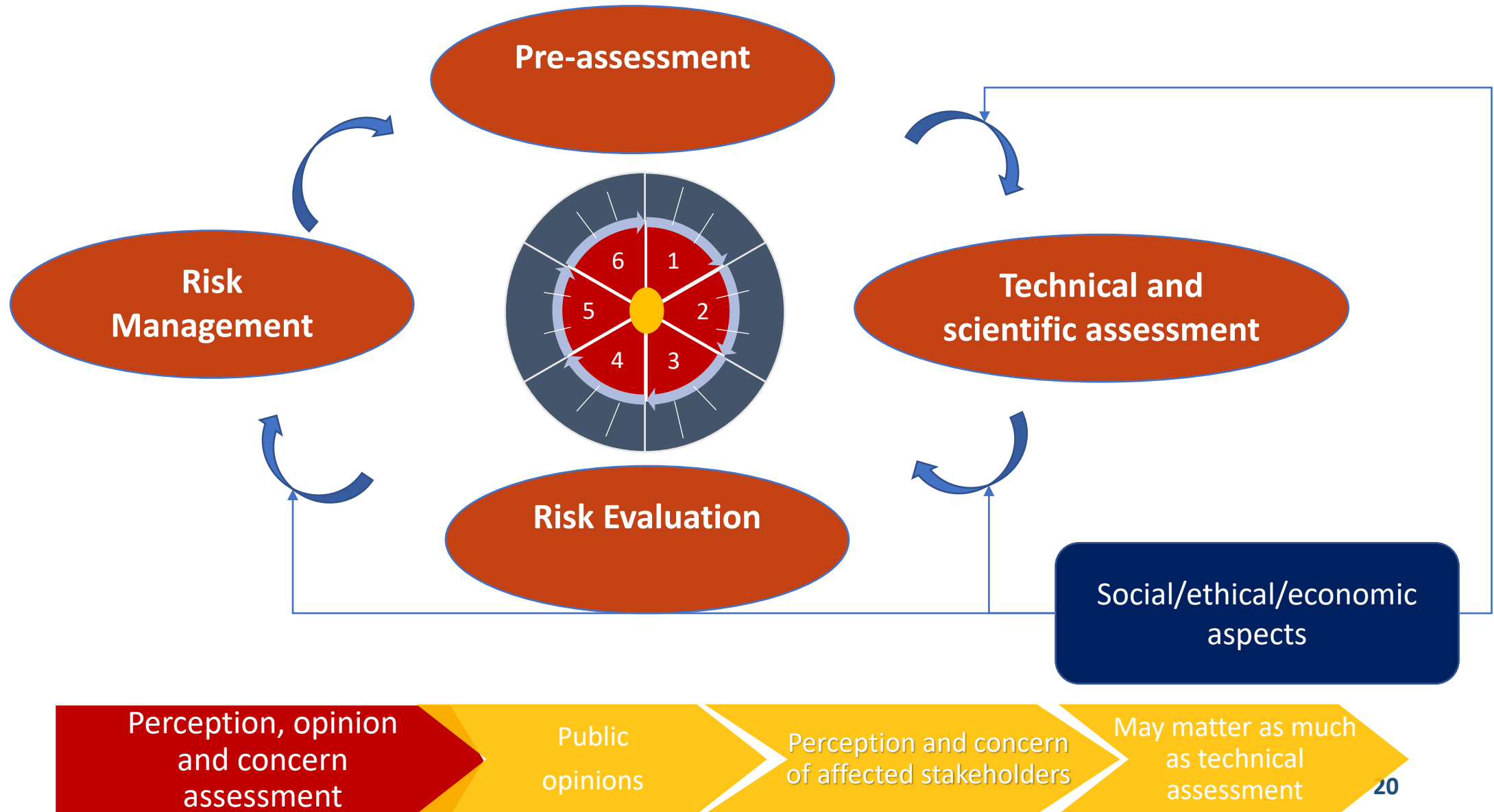
Software Architecture



Stakeholder involvement

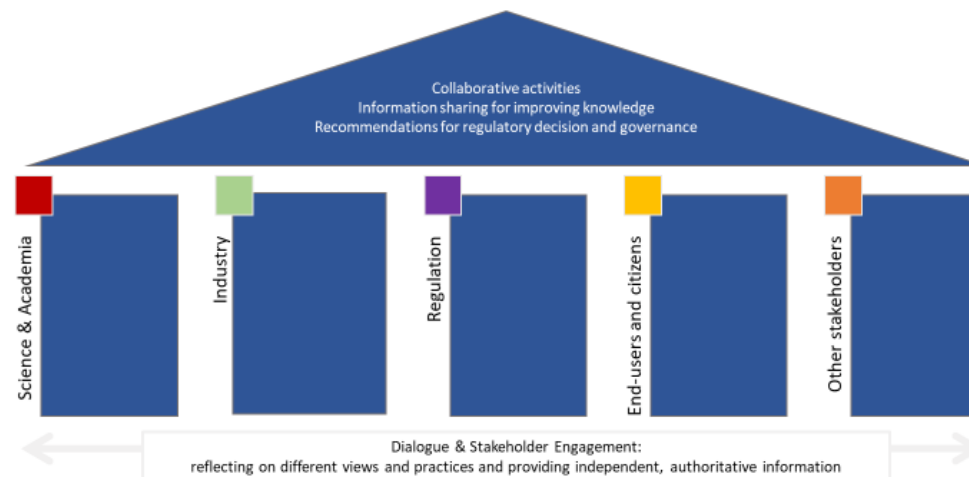


# Nano Risk Governance Framework – under construction

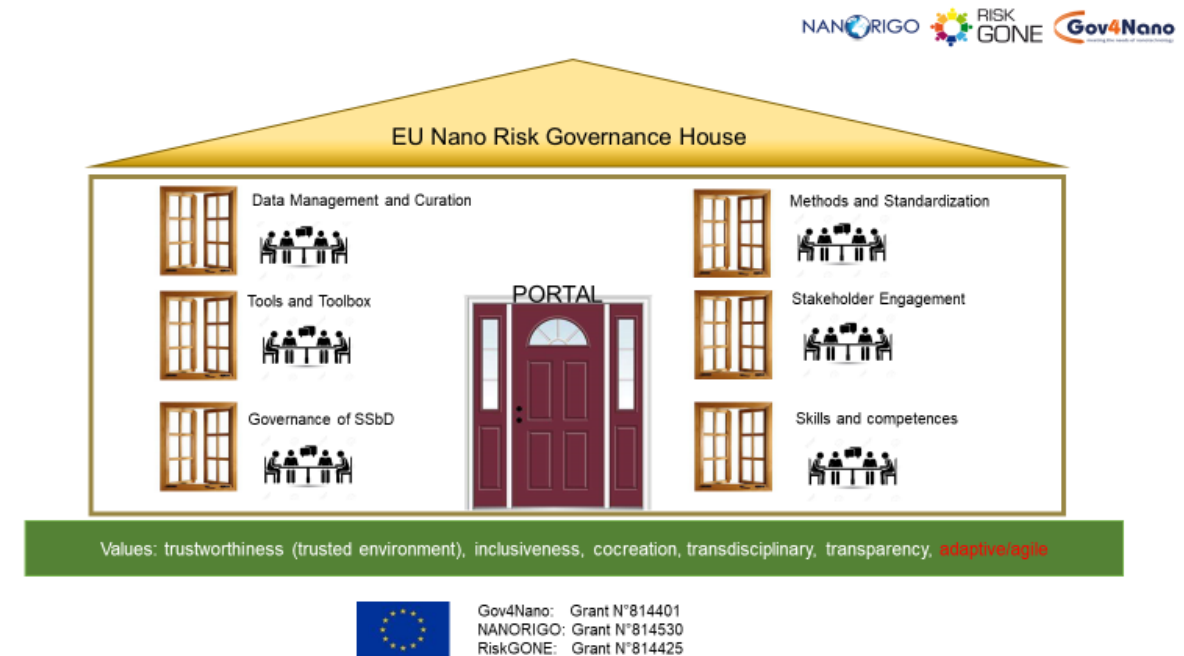
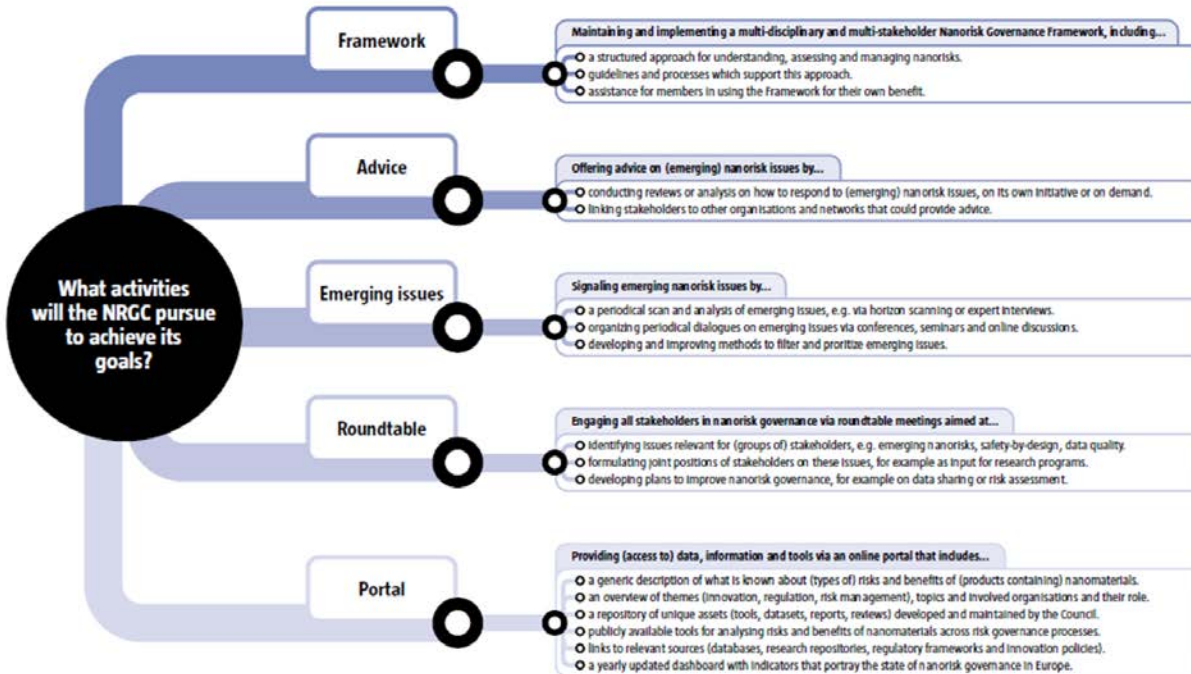


# Organisation for Nano Risk Governance

- The main purpose is: fostering safe and sustainable development and use of nanomaterials in Europe.
- Put the framework into practice
- Overarching, independent, trustworthy body
- Bridge between knowledge generators and decision makers
- Services for all stakeholders



# A new concept: the EU Nano Risk Governance House



**Ambition: To foster safe and sustainable development, use and disposal of (products containing) nanomaterials in Europe**



# Nano Risk Governance Portal

- Infrastructure integrates academic, industry and regulatory information
- Support decision making framework & council
- Validated state-of-the-art tools
- NANoREG, caLIBRAte, NanoCommons & NanoReg<sup>2</sup>
- QA/QC processes and decision tree
- Process for collection and harmonisation of data
- Covers applicability and acceptance (regulatory or industrial)

Content

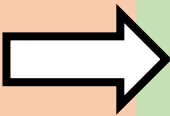
New NMBP-13 tools

Existing Tools from previous projects / Other developers (validated or evaluated)

FAIR DataBase(s)

Standards and Guidances

Selection of nodes

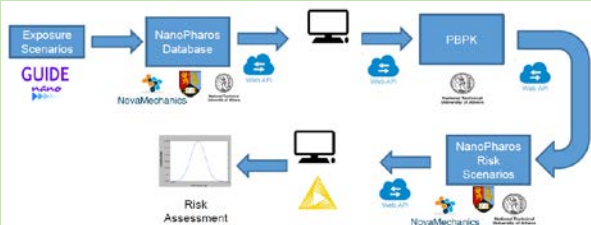


Possible interoperable Software Architecture

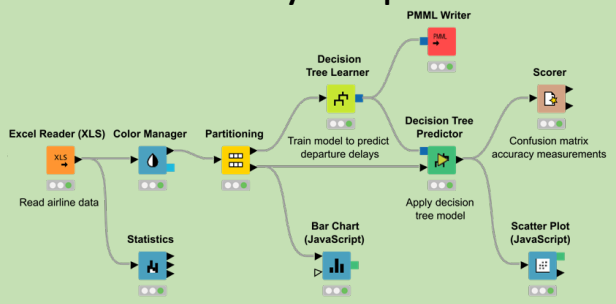
Technical Implementation



Docker

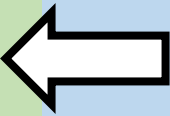


KNIME Analytics platform



Guiding Logic

Workflows



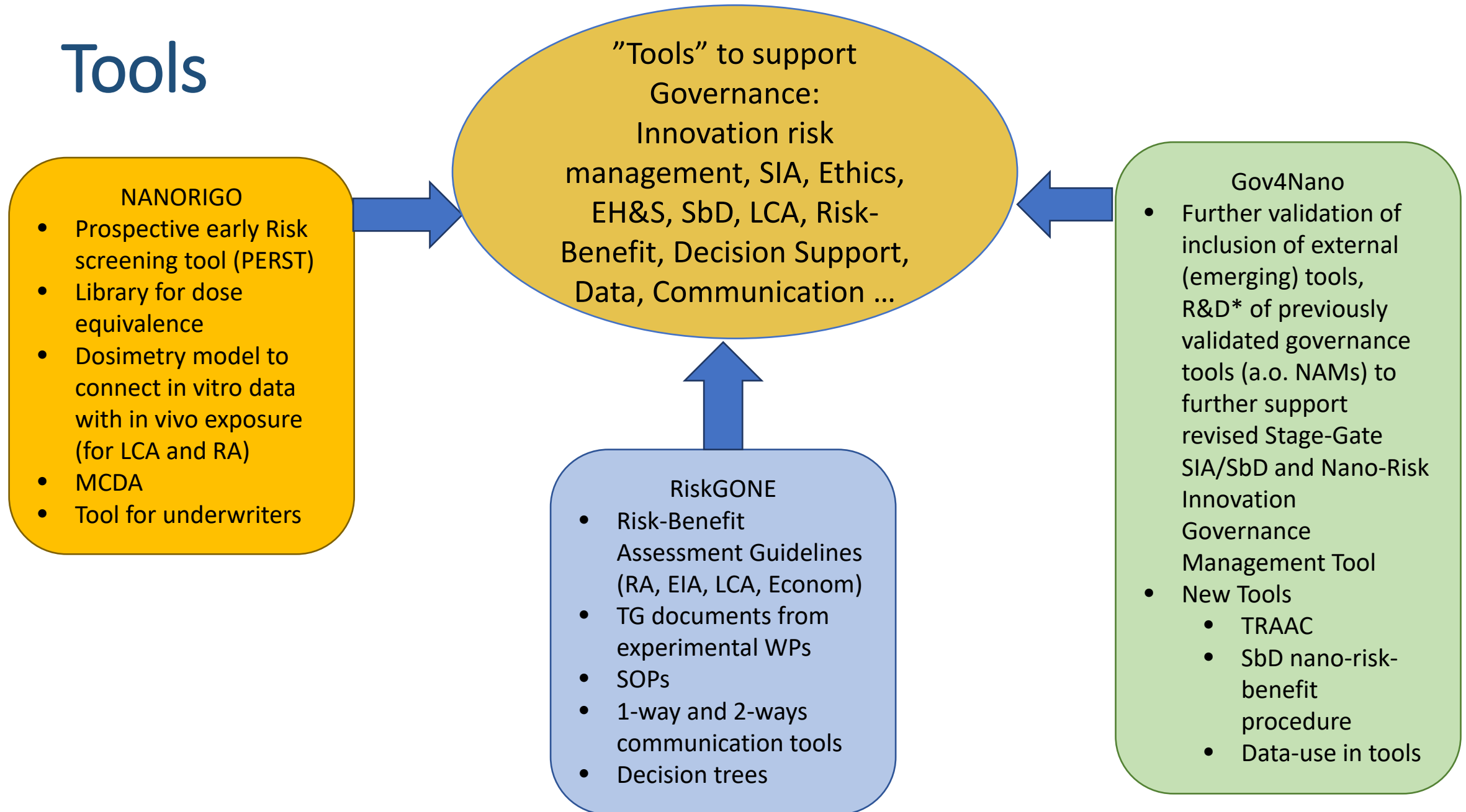
Nano Risk Governance Framework

Building blocks

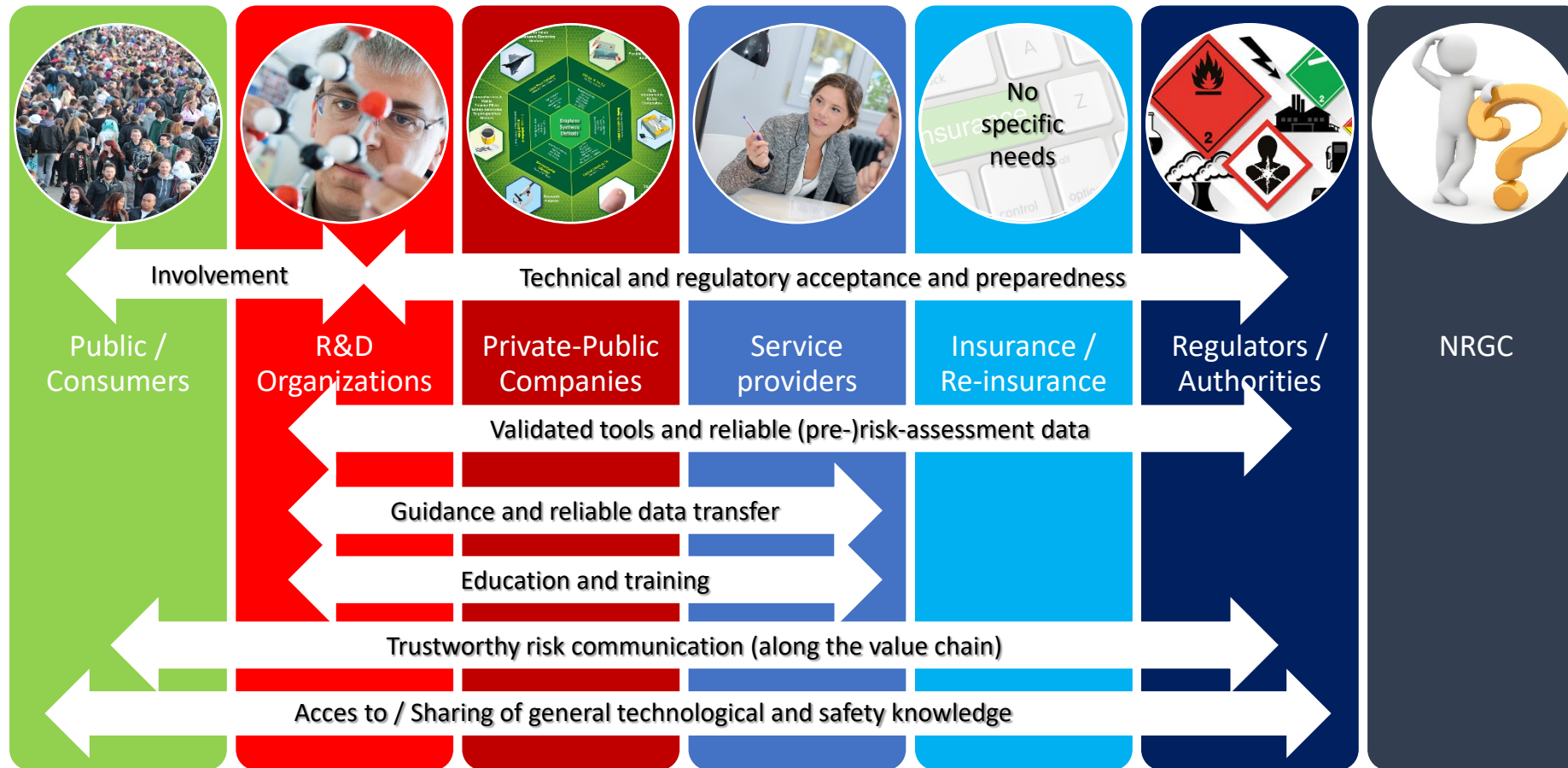
Guidance – Decision Trees



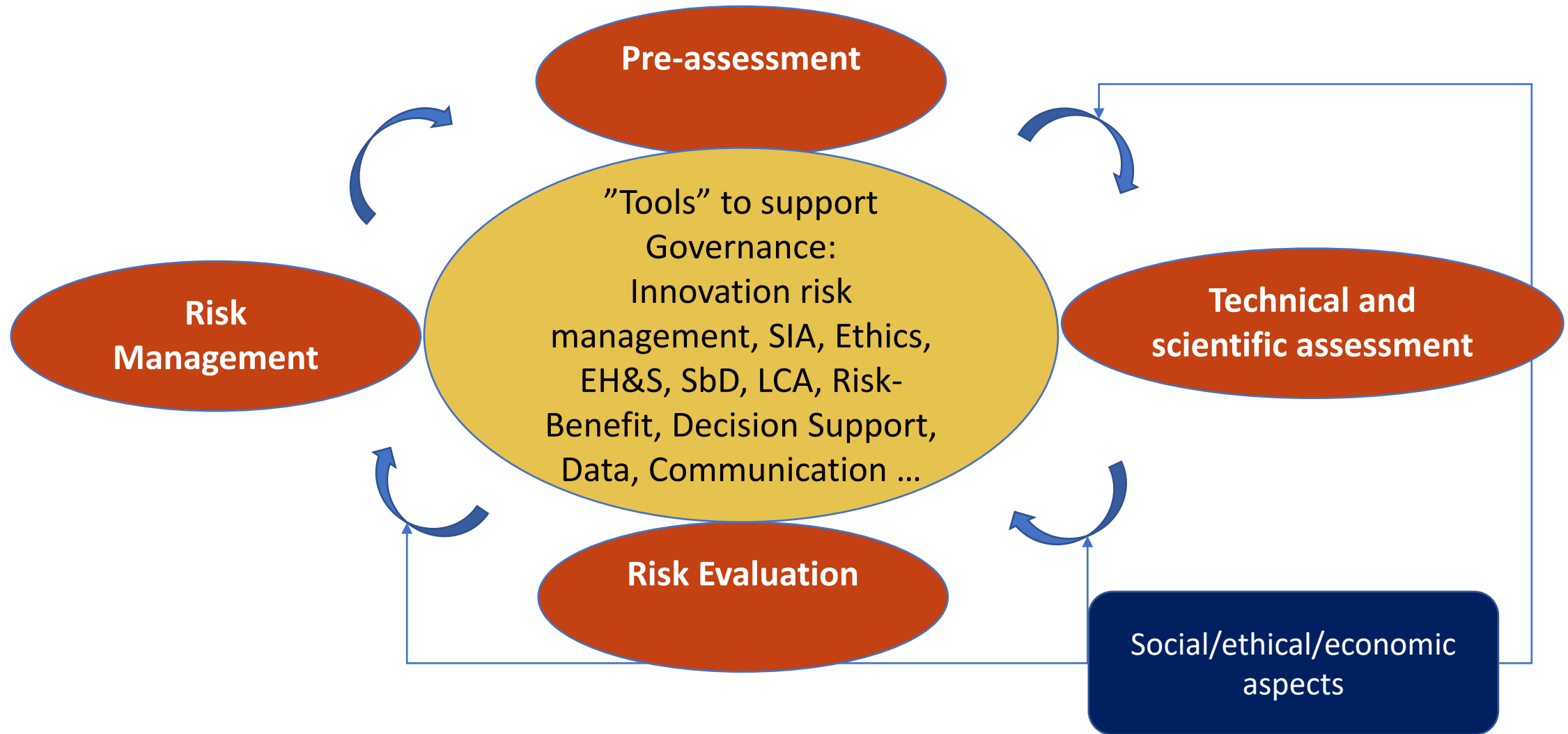
# Tools



# Main needs from stakeholders



# Nano Risk Governance portal – under construction



# Portal & tools - Scientific support for guidelines

- Collaboration with Malta Initiative to join (EU) forces
- Nano-specific adaptations of OECD TG/GD
- Dedicated regulatory risk research & experimental work
- Specific endpoints to be addressed: surface chemistry, solubility, reactivity and dustiness of nanomaterials, ecotoxicity and in vitro cytotoxicity and in vitro genotoxicity

# The Malta Initiative

The  Initiative –  
A European Action to Develop OECD Test  
Guidelines for Nanomaterials

- A joint route towards standardisation, testing guidelines and guidance documents.

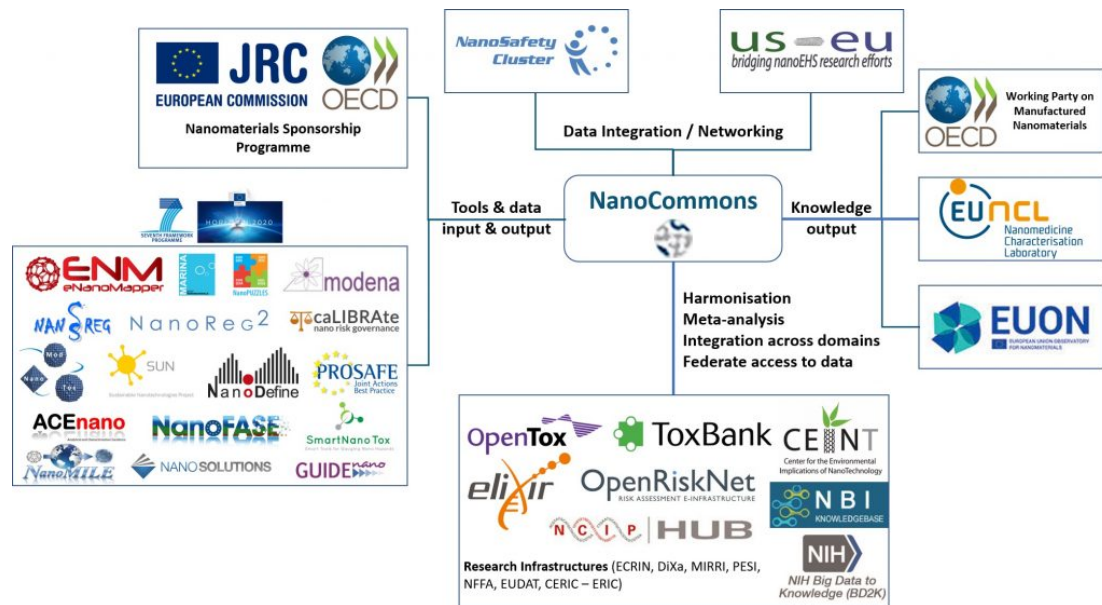
NanoHarmony



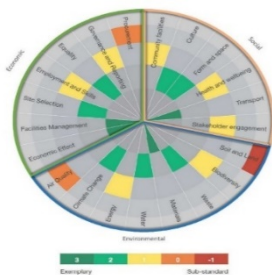
# Testing and Assessment

Section 1 Physical Chemical Properties	Section 2 Effects on Biotic Systems	Section 3 Env. Fate and Behaviour	Section 4 Health Effects
<p>TG on determination of the (volume) specific surface area of manufactured nanomaterials <b>(EU) WNT 1.3</b></p> <p>TG on particle size and size distribution of manufactured nanomaterials <b>(DE) WNT 1.4</b></p> <p>GD on determination of solubility and dissolution rate of nanomaterials in water and relevant synthetic biological media <b>(DK/DE) WNT 1.5</b></p> <p>GD on identification and quantification of the surface chemistry and coatings on nano- and microscale materials <b>(DK/DE) WNT 1.6</b></p> <p>TG on determination of surface hydrophobicity of manufactured nanomaterials <b>(EU) WNT 1.7</b></p> <p>TG on determination of the dustiness of manufactured nanomaterials <b>(DK/FR) WNT 1.8</b></p>	<p>Adaptation of OECD TGs 201, 202 and 203 for the determination of the ecotoxicity of manufactured nanomaterials <b>(WPMN)</b></p> <p>ENV/CBC/NANO(2021)7</p>	<p>TG on dissolution rate of nanomaterials in aquatic environment <b>(DE) WNT 3.10</b></p> <p>TG for nanomaterial removal from wastewater <b>(US) WNT 3.11</b></p> <p>GD on assessing the apparent accumulation potential for nanomaterials <b>(ES) WNT 3.12</b></p> <p>GD to support implementation of TG 312 for nanomaterial safety testing <b>(CA/DE) WNT 3.14</b></p> <p>GD on environmental abiotic transformation of nanomaterials <b>(AT) WNT 3.16</b></p> <p>Scoping review for a tiered approach for reliable bioaccumulation assessment of manufactured nanomaterials in organisms minimising use of vertebrate tests <b>(UK) WPMN</b></p> <p>ENV/CBC/NANO(2021)9</p> <p>Assessment of the durability of NMs and their surface ligands in env. surroundings (biodegradable/biodegradable) <b>(SA/Korea) WPMN</b></p>	<p>GD on the adaptation of <i>in vitro</i> mammalian cell based genotoxicity TGs for testing of manufactured nanomaterials <b>(EU)</b></p> <p>Applicability of the key event based TG 442D for <i>in vitro</i> skin sensitisation testing of nanomaterials <b>(CH) WNT 4.133</b></p> <p>TG on toxicokinetics to accommodate testing of nanoparticles <b>(NL/UK) WNT 4.146</b></p> <p>Integrated <i>in vitro</i> approach to assess the intestinal fate or orally ingested nanomaterials <b>(IT) WPMN</b></p> <p>ENV/CBC/NANO(2021)8</p> <p>GD on the determination of concentrations of nanoparticles in biological samples for (eco)toxicity studies <b>(UK) WNT</b></p>

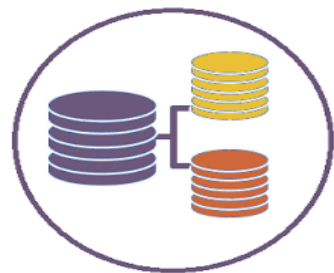
# Data management – overall picture



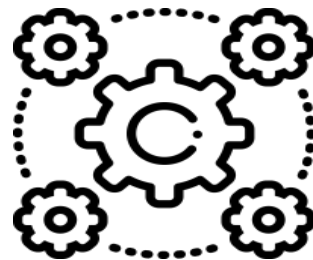
## Data management plans



## Quality/fitness for re-use scoring of datasets



## Datasets to support case studies



## Interoperability and automation

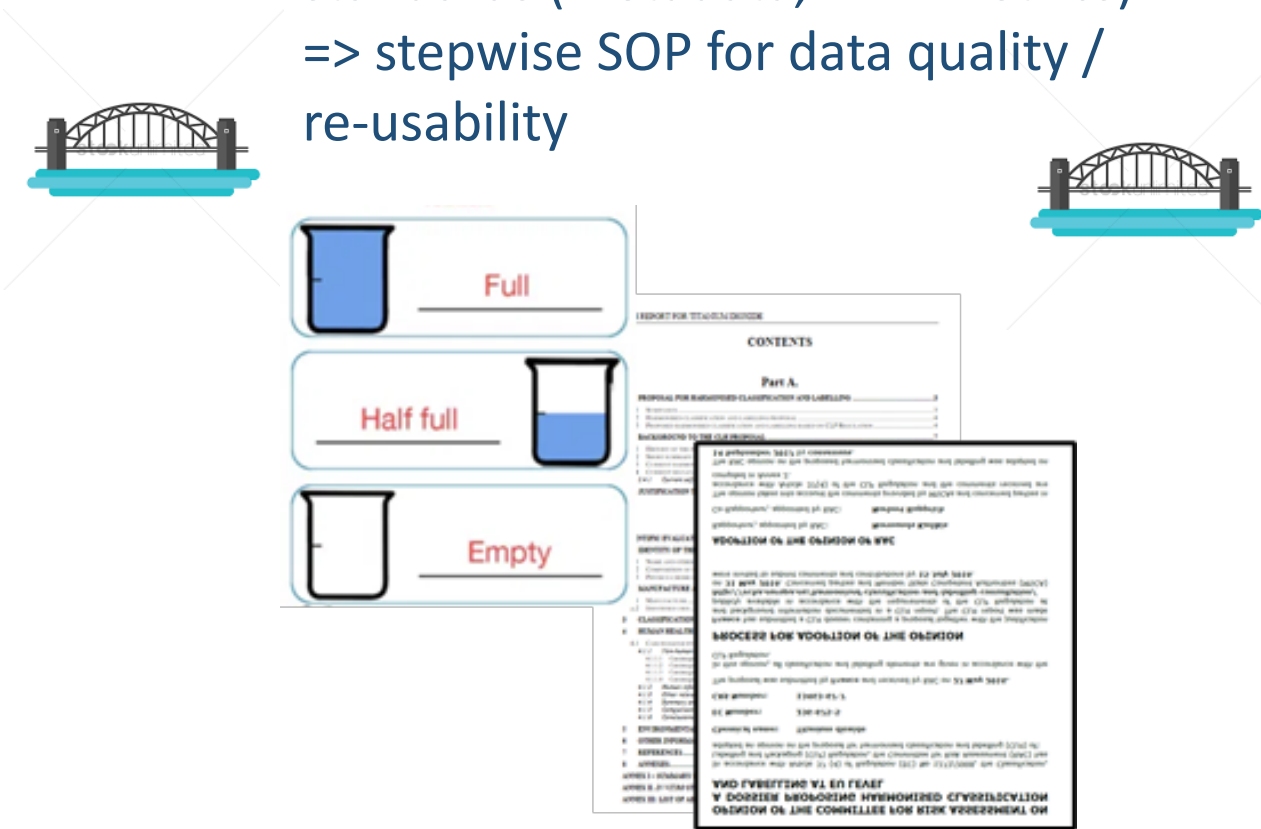


# Data management from concept to implementation.....

Conceptualisation & user needs documentation



Community consensus on data standards (metadata, FAIR metrics)  
=> stepwise SOP for data quality / re-usability



Operationalisation & automation (tooling) to facilitate data re-use, decision making & sustainability



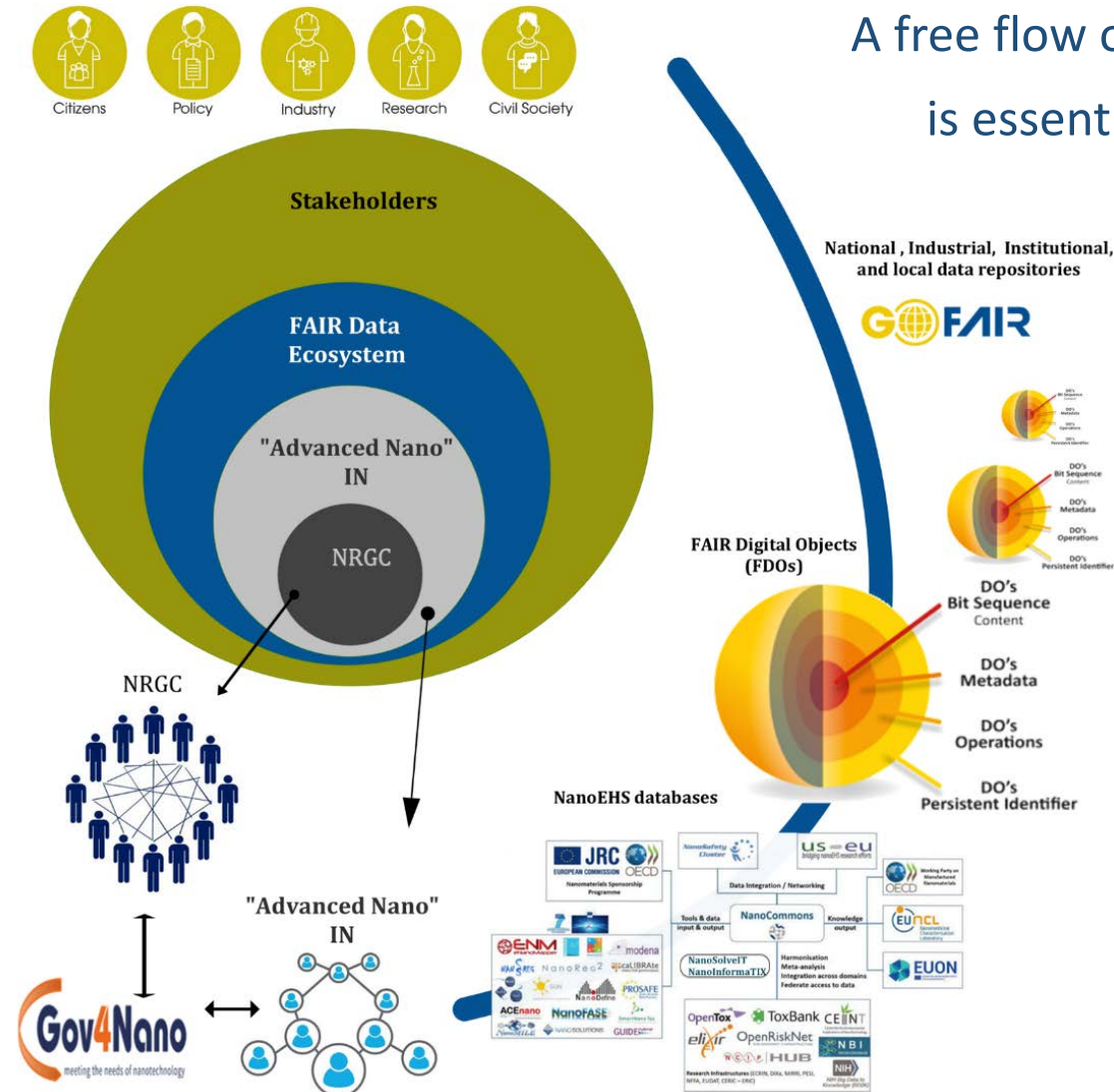
Measurement Method	Dispersant	Diameter	Unit
Dynamic Light Scattering	MILK Water	56.05	nm
Electron Microscopy	Phosphate Buffer	0.05	µm



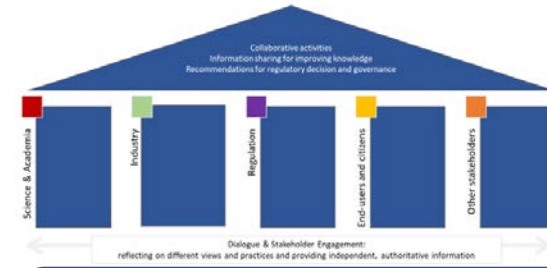
## FAIR databases are key – Findable, Accessible, Interoperable and Reusable

A free flow of high-quality, FAIR, NanoEHS data  
is essential for effective risk governance

- Science-based decision making
- Reuse of existing data
- Harmonisation of data templates

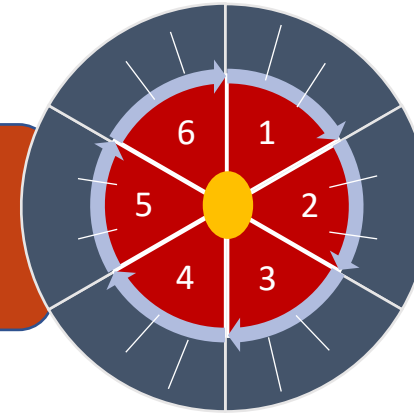


[www.go-fair.org/advancednano/](http://www.go-fair.org/advancednano/)



House of Nano-Risk  
Governance

Nano-Risk Governance  
Framework



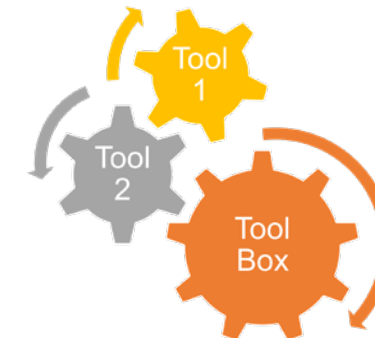
Nano-Risk Governance  
Portal

Guidances and  
guidelines

FAIR – databases

"Tools" to support Governance:  
Innovation risk management, SIA, Ethics,  
EH&S, SbD, LCA, Risk-Benefit, Decision  
Support, Data, Communication ...

**Stakeholder  
Needs and Priorities?**

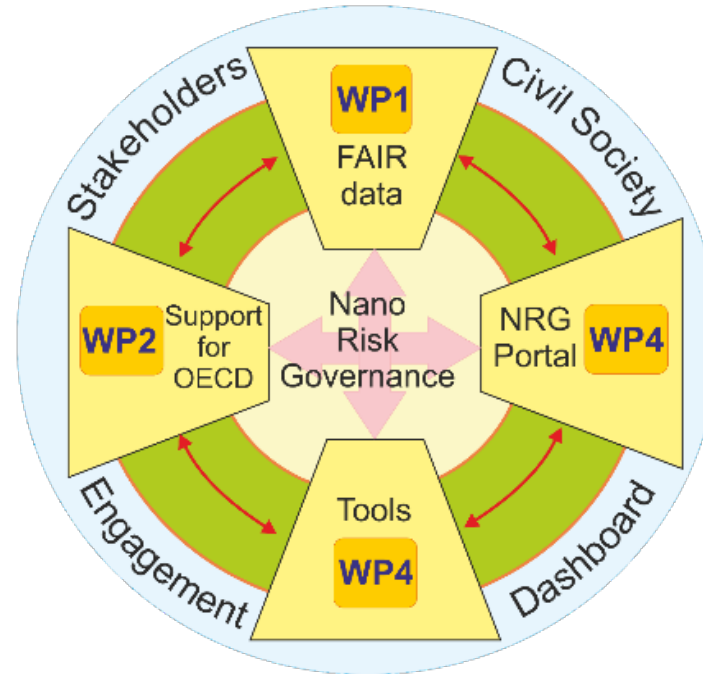


**Suitable & Valid?**

## Systematic approach for efficient and effective Nano Risk Governance

- infrastructure for stakeholder engagement & collaboration
- networks for harmonization, improved data quality, international collaboration
- coordination and prioritization research needs for regulatory risk assessment
- monitoring system

- Access to **high quality data** & tools for decision making
- **Improved standardisation and validation process**



- Implementation **FAIR principles**
- **Risk governance portal and platforms:** knowledge & information sharing

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# 1. NEW POLICY AMBITIONS: EU Green Deal

The European Green Deal is about **improving the well-being of people**. Making Europe climate-neutral and protecting our natural habitat will be good for people, planet and economy. No one will be left behind.

## The EU will:



Become  
climate-neutral  
by 2050



Protect human life,  
animals and plants,  
by cutting pollution



Help companies  
become world leaders  
in clean products and  
technologies



Help ensure a  
just and inclusive  
transition



# EU Strategies: providing direction and goals

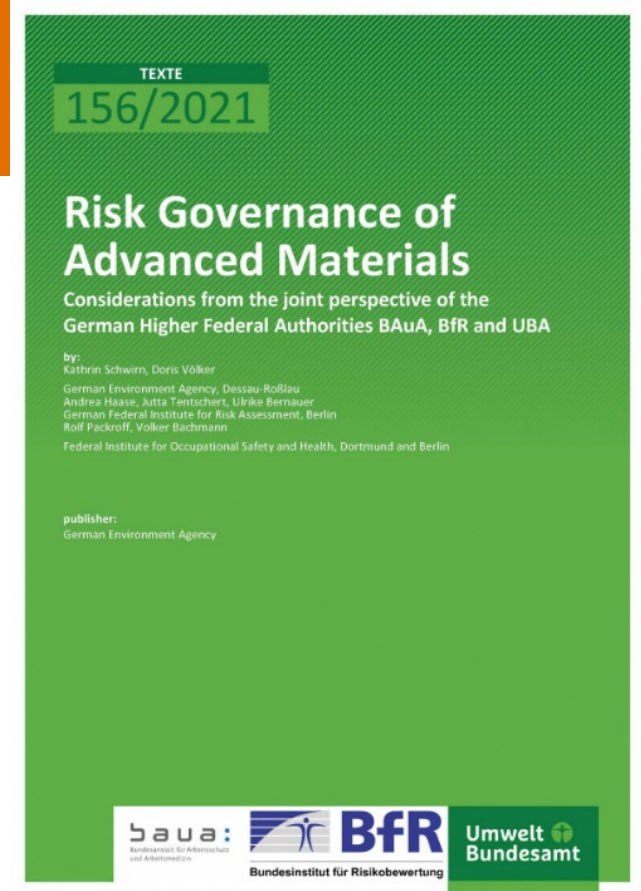


...many more..



# Key role for new materials

Potential to provide technical solutions for pressing global challenges, i.e. for energy revolution, digitalisation, or health care



**So PACE of development and application of (advanced) nanomaterials is stimulated by GD policy ambitions – MODERN INNOVATION POLICY**

# URGENCY for solutions

## Pollution crosses 'planetary boundary'

The production of plastics and other pollutants now outstrips our ability to monitor it and threatens global ecosystems. Researchers at the Stockholm Resilience Centre conclude that **chemical pollutants** have crossed a 'planetary boundary'. The concept stems from an influential 2009 *Nature* paper that suggested nine boundary conditions in the Earth system that could, if crossed, result in tipping points that could harm human life. At the time, the impact of chemical pollutants was not known — but now, we've gone too far, say the researchers. "The total mass of plastics now exceeds the total mass of all living mammals," says ecotoxicologist and study author Bethanie Carney Almroth. "That to me is a pretty clear indication that we've crossed a bound on chemical po!

**ENVIRONMENTAL**  
Science & Technology

[pubs.acs.org/est](https://pubs.acs.org/est)



Policy Analysis

## Outside the Safe Operating Space of the Planetary Boundary for Novel Entities

Linn Persson,\* Bethanie M. Carney Almroth, Christopher D. Collins, Sarah Cornell, Cynthia A. de Wit,\* Miriam L. Diamond, Peter Fantke, Martin Hassellöv, Matthew MacLeod, Morten W. Ryberg, Peter Sogaard Jørgensen, Patricia Villarrubia-Gómez, Zhanyun Wang, and Michael Zwicky Hauschild

January  
2022



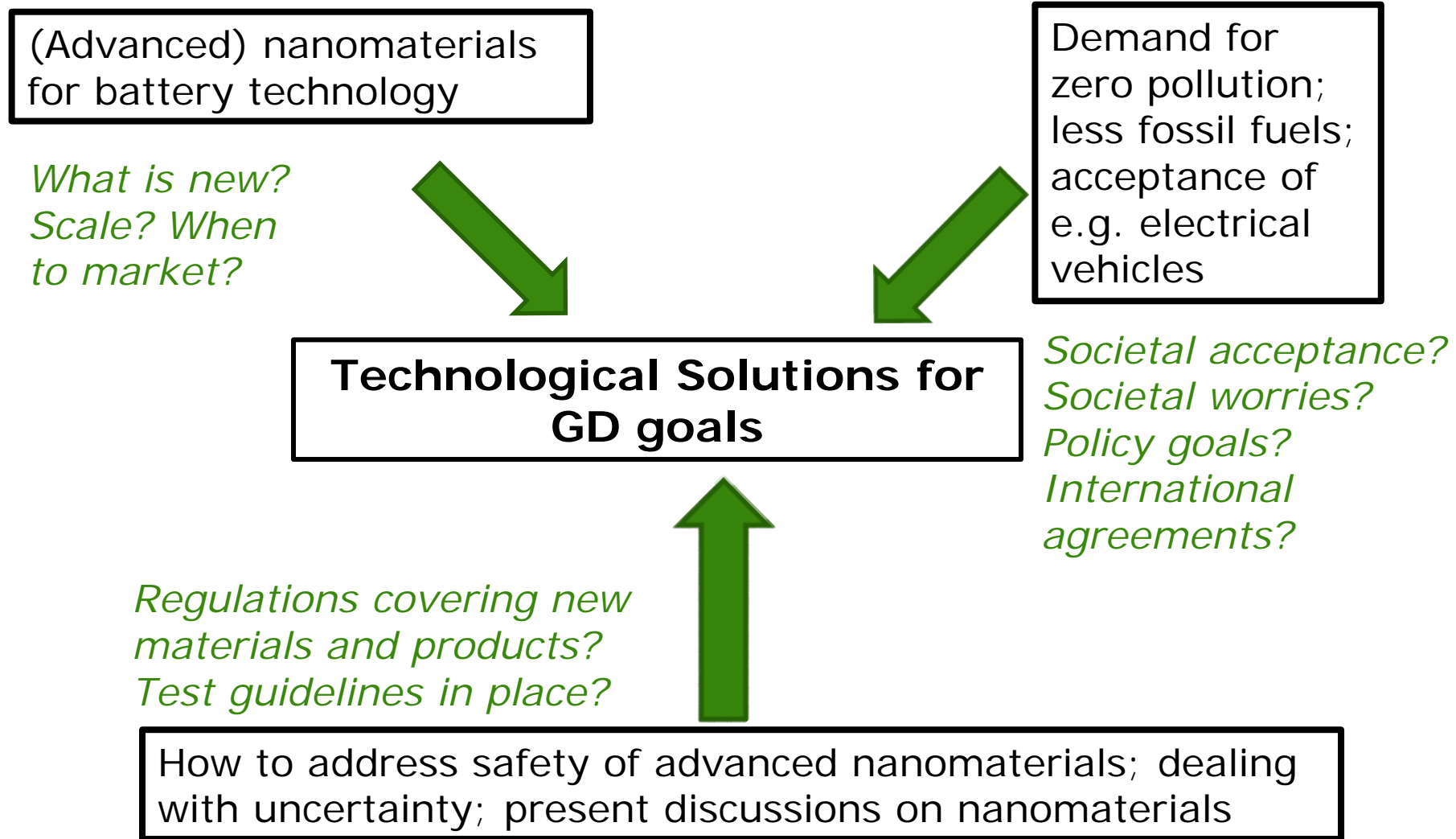
Cite This: <https://doi.org/10.1021/acs.est.1c04158>



Read Online

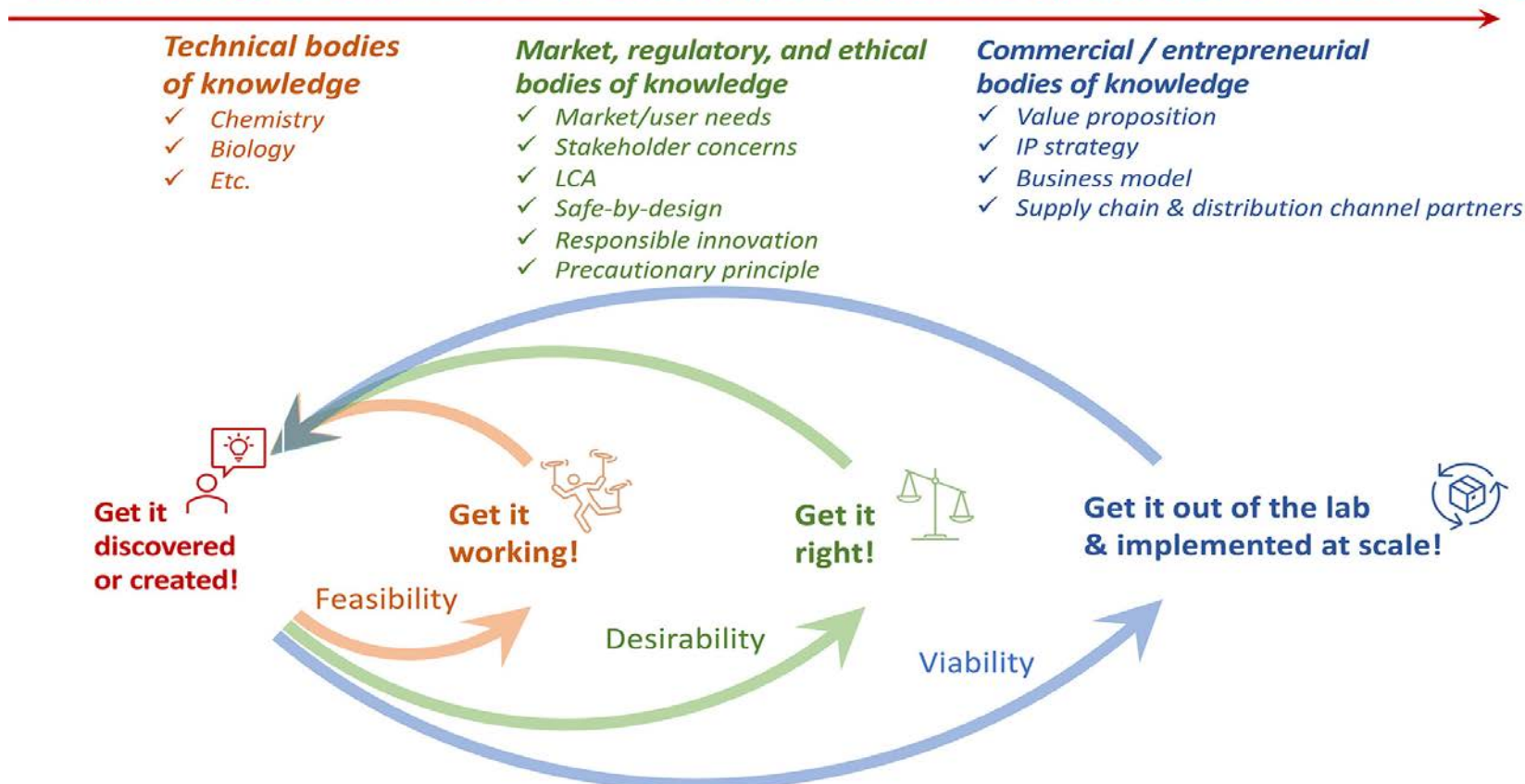


# Technological solutions, regulatory perspective



## 2. New technology development, new nanomaterials

*Circular knowledge translation: Increasing relevance of flowing diverse bodies of knowledge into lab activities early and often*



Circular knowledge translation. Created by Wojciech Chrzanowski, Goretty Dias, Steven Maguire, and Elicia Maine, 2021.

***Nanotechnology for a Sustainable Future: Addressing Global Challenges with the International Network4Sustainable Nanotechnology. Pokrajac et al. ACSnano; December 2021 DOI: (10.1021/acsnano.1c10919)***

# 3. NEW CHEMICALS RISK ASSESSMENT

**PARC: HE-partnership  
programme (2022-2029)  
– coordinated by ANSES,  
France -**



New techniques; new analytical methods

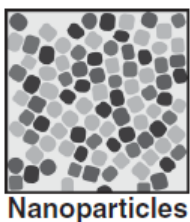
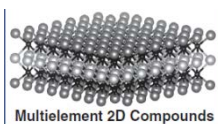
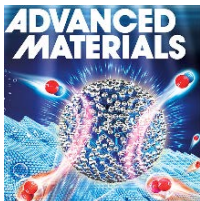
Machine learning & AI

New Alternative Methods: NAMs

Etc.

# 3 developments affecting RA of nano

New materials for innovations



INNOVATION CHALLENGES

SCIENTIFIC/RA CHALLENGES

POLICY AND SOCIETAL CHALLENGES

Present

2030-2050



New chemicals RA



Non-toxic  
Zero pollution  
Sustainability

# EU Strategies: Chemicals Strategy for Sustainability

## OBJECTIVES

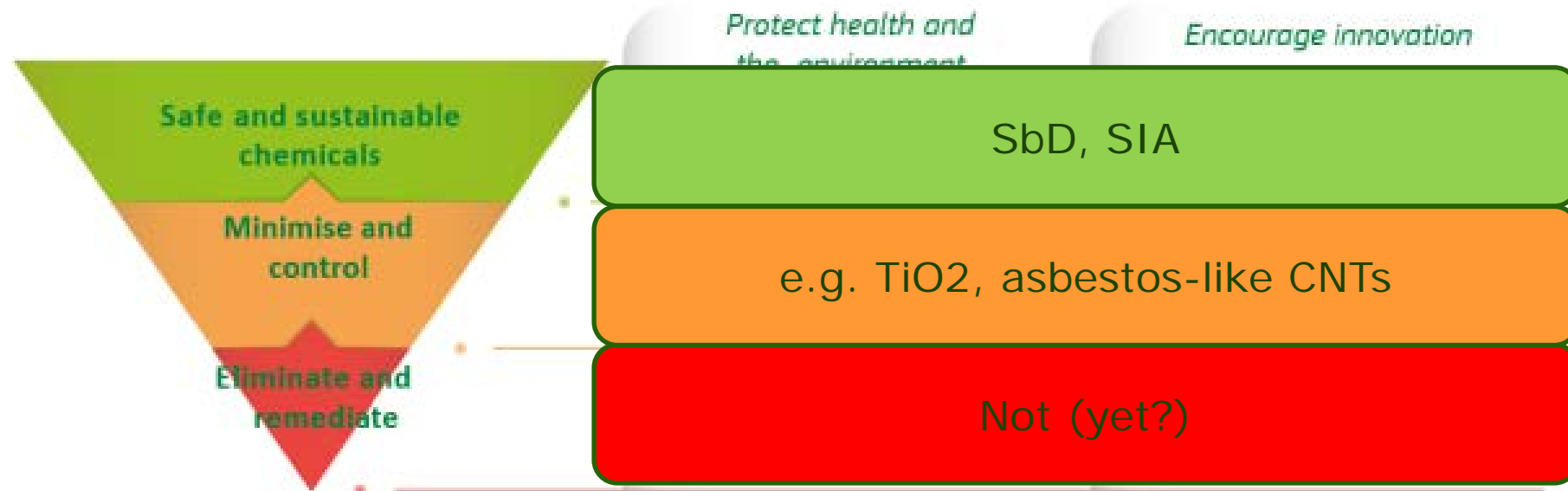
- better protect citizens and the environment
- boost innovation for safe and sustainable chemicals

## ACTIONS relevant for risk assessment nanomaterials

- banning the most harmful chemicals in consumer products – only essential use
- account for mixture effects
- boosting SSbD
- establishing a simpler “one substance one assessment” process for the risk and hazard assessment of chemicals
- playing a leading role globally by championing and promoting high standards



# EU Strategies: Chemicals Strategy for Sustainability



*Figure: The toxic-free hierarchy – a new hierarchy in chemicals management*

# Nano dossier: keeping pace with policy ambitions

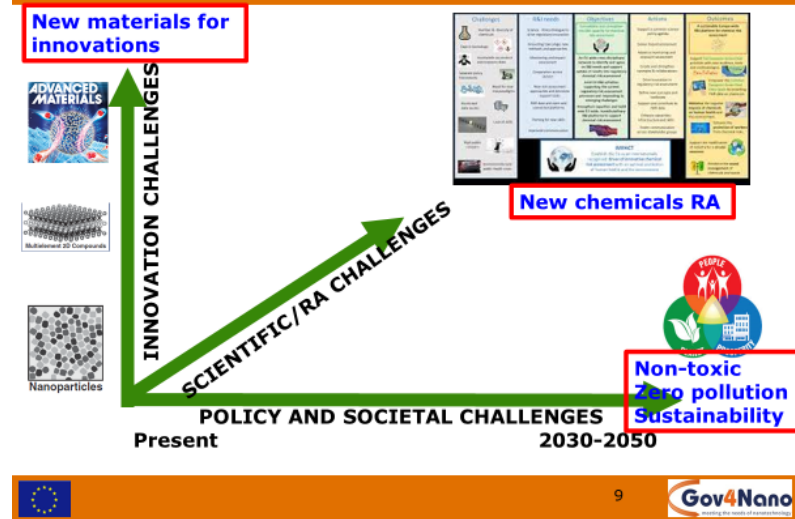
EXAMPLES	FOCUS
Elaboration on toxicological endpoints	Additional toxicological endpoints: immunotox, ED, neurotox, respiratory effects, specific organs
Elaboration on specific populations	Vulnerable groups, e.g. children
Harmonization, standardization	Development of standardized methods
Innovation in chemicals risk assessment	New techniques, digitization (like AI), etc.
Do no harm to man and its environment	Safe, sustainable, circular
Transregulatory	One substance, one assessment
Safe-by-Design	Safe-and-Sustainable-by-Design



# Needs beyond toxicological knowledge

- Knowledge and information sharing:  
*how to organize?*
- Innovation supportive regulations:  
*how to connect?*
- Innovation in risk governance:  
*how to adapt?*
- Co-creation:  
*how to operationalize?*
- Dialogue:  
*do we have the skills and competences for it?*
- .....

## Risk Assessment nano/new materials - multidimensional



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  - NMBP-13 projects: expected impact and results
- Changing policy ambitions: green deal and Chemical Strategy for Sustainability
- Regulatory Research needs: results of two Gov4Nano summits

# Transregulatory risk assessment summit (2019 & 2022)

To provide a forum to discuss knowledge needs for risk assessment, and to translate these needs into research questions for the scientific Community

- **Share lessons:** facilitating mutual learning amongst experts and stakeholders in an interdisciplinary and inter-domain fashion.
- **Identify priorities:** ensuring most urgent scientific information needs and regulatory issues are integrated in policy research agenda, in support to regulatory oversight and compliance.
- **Promote harmonization:** finding common solutions to relevant topics such as data gaps, test guidelines and harmonization of methods.
- **Identify operational research agendas:** translate nano-specific issues in inputs for research agendas, funding mechanisms and other incentives to support and further develop risk analysis approaches, knowledge and data.



# What do regulatory risk assessors want and need?

## Ideal situation

- Regulatory requirements are in line with risk assessment needs
- Integration of knowledge among regulatory domains
- Consultation of regulatory risk assessors
- Structural inventory of knowledge gaps/needs
- Structural funding despite urgency of needs
- Monitoring system to ensure efficiency of process



# Results RRAS and follow up survey I

## Research question to pursue (challenge)

### Develop case studies on prediction/measurement of the toxicokinetic behaviour, including

- transformation of NMs inside the body (internal exposure)
- testing methods
- measured data, considering issues of data quality and reliability

### Use- to the extent possible- lessons learned from other nanomaterials

## Regulatory risk assessment issues to overcome (scope)

Lack of knowledge on which physico-chemical characteristics are essential for risk assessment purposes within and across domains (definition)

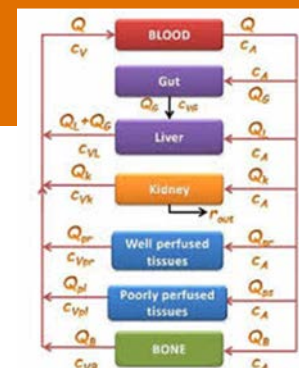
Lack of guidance in dealing with toxico-kinetics of nanomaterials (exposure)

Lack of understanding of the exposure pathways inside (human) body and outside (human) body (exposure)

Lack of insight in reliability of in silico, in-vitro and in-vivo models toxico-kinetics and hazard (hazard)

Limited availability of exposure/ release case studies, including measurements and guidance on exposure data, toxicokinetic data (risk assessment/ risk management)

Data quality and reliability for the purpose of characterization and testing is questionable (definition)



# Results RRAS and follow up survey II

Research question to pursue (challenge)	Regulatory risk assessment issues to overcome (scope)
<p><b>Identify the minimal panel of parameters to determine equivalence/similarity in the different areas of regulatory risk assessment (identity is covered in this), with respect to:</b></p> <ul style="list-style-type: none"> <li>- <b>Phys-chem (intrinsic and extrinsic),</b></li> <li>- <b>Biological interactions,</b></li> <li>- <b>Toxicokinetics (ADME).</b></li> </ul> <p><b>Speed up the adoption of described parameters</b></p> <p><b>Identify parameters and criteria for grouping and read across (equivalence)</b></p>	<p>Lack of knowledge on which physico-chemical characteristics are essential for risk assessment purposes within and across domains (definition).</p> <p>Lack of harmonised understanding of equivalence of nanomaterials in regulatory context (e.q. parameters and methods to test equivalence) (definition)</p> <p>Lack of grouping strategies (when are NM similar?) (definition)</p>

Equivalence



Similarity



# Results RRAS and follow up survey III

Research question to pursue (challenge)	Regulatory risk assessment issues to overcome (scope)
<b>Identify the usefulness of currently available non-nanomaterials exposure models for nanomaterials (external exposure).</b> <b>If useful, validate the models for nanomaterials with measured data: share data, generate new data, incentives</b>	Lack of validated exposure models (exposure)  Limited availability of exposure/ release case studies, including measurements and guidance on exposure data, toxicokinetic data (risk assessment/ risk management)



EXPOSURE



# Main conclusion RRAS and survey

- RRAS results are confirmed by follow up survey amongst more risk assessors from different domains
- RRAS results support recommendations from the ProSafe White Paper (2017)
  - *Recommendation 6: Where possible, calls for nanosafety projects should be far more specific in giving clear instructions to ensure that data and results generated are of a type and form which allows their use in topics of regulatory relevance, such as choice of materials, test methods to be applied, SOPs and data management. The NanoSafety Cluster could play a role in defining such conditions.*
- Risk assessors expressed the need for more informal transregulatory exchange of views and issues

REF: ProSafe (2017) *The ProSafe White paper: Towards a more effective and efficient governance and regulation of nanomaterials.* last visited July 2020

# 2<sup>nd</sup> Regulatory Risk Assessment Summit (2022)



Keeping pace with European ambitions for safe and sustainable nanomaterials and products:

## Main Actions

- banning most harmful chemicals in consumer products (unless essential) including PFAS;
- *"one substance one assessment"* for risk and hazard assessment of chemicals;
- account for the cocktail effect of chemicals when assessing risks from chemicals;
- boosting production and use of safe and sustainable by design chemicals;
- global role by promoting high standards and not exporting chemicals banned.

1. One substance one assessment
2. New endpoints for risk assessment (nano)



# Summary

## > Research needs

### –Physico-chemical properties

- stability of the nanomaterials
- surface chemistry/reactivity

### –Human health endpoints

- dispersion stability in biological media and related dosing in toxicity testing
- dermal exposure route
- endocrine disruption, immunotoxicity, neurotoxicity, reprotoxicity

### –Environmental endpoints

- long-term testing (including interference of feed)
- biotic and abiotic degradation/transformation persistence
- interactions with natural (particulate) matter (adsorption/desorption, heteroaggregation)  
mobility

## ECHA-NMEG

Environment: **emission scenarios, relevant PECs**

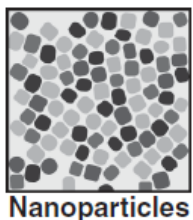
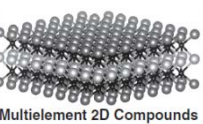
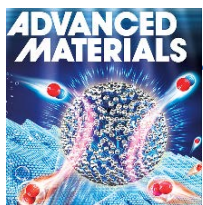
Human health: dermal absorption, **irritation & corrosion (skin/eye)**, reproduction/development toxicity, carcinogenicity/**long-term toxicity**



Chemicals Strategy for Sustainability  
Towards a toxic-free environment



New materials for  
innovations



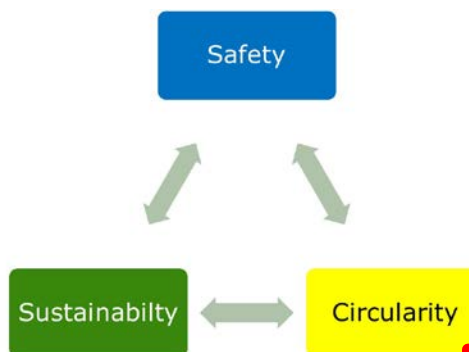
INNOVATION CHALLENGES

SCIENTIFIC/RA CHALLENGES

POLICY AND SOCIETAL CHALLENGES  
Present 2030-2050



New chemicals RA



Non-toxic  
Zero pollution  
Sustainability



Nanosafety community



Proactive

Share lessons  
learned

Open to finding  
solutions with other  
regulatory  
communities and  
domains





Thank-you for  
your attention

Thanks to all partners and people in NMBP-13 projects

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