

## Response to House of Lords Nano & Food Report

The Responsible Nano Forum welcomes the scrutiny given to Nanotechnologies and Food by the House of Lords Science and Technology Committee and supports its recommendations. We fully concur with the need to ensure the safe and effective use of nanotechnologies in food (and all other consumer products.)

In addition to the evidence we submitted, some of which is quoted in the report, (see <http://bit.ly/4PHnb6>), we would like to highlight four areas of our work which are dealt with by the report for more detailed comment:

### A register of all products is needed - but how to make it work?

We agree with the Committee's Recommendation 30 that a register of food and packaging produced using nanotechnologies is important and desirable. However, we don't see that this should be confined simply to nanotechnologies and food, but that it is important for the public to have access to information on all products enabled by the various nanotechnologies, particularly those currently available.

As the report indicates, the information held on any register may have a number of purposes, only one of which is to provide relevant and easily understood information for the general public. For this purpose, we feel the information should explain briefly how nano is used in these individual products, the benefits it brings and any safety, social, ethical or environmental concerns which may arise from its use. It may also provide an opportunity for stakeholder comment and debate alongside the information. More detailed information on safety and research may be held elsewhere for other purposes.

There are concerns on the one hand, that such information will be just a 'sales tool' for the products and on the other, that information about risk will be over-stated and ignite concern unnecessarily. We believe that in advance of mandatory reporting of the use of nanomaterials, a collaborative approach, working with business, may be more successful in obtaining relevant and useful information for the public than previous attempts to obtain more detailed data. The Report calls for more openness and transparency by business, (Recommendation 29) we believe that a voluntary initiative such as this would be an excellent platform with which to begin this process with their most important audience - their customers.

The Responsible Nano Forum created the pilot website [www.nanoandme.org](http://www.nanoandme.org) (complimented in Recommendation 28 of the report) which was funded by a grant from the UK government (though this pilot is now complete and the hosting due to stop at the end of January 2010 without further funding). The site was very well received by opinion formers in the UK and internationally and a report of the pilot is available at [www.responsiblenanoforum.org](http://www.responsiblenanoforum.org).

Nano&me was also designed to be the platform for such a register of products, giving impartial information about individual products under the existing Nano Products sections: <http://www.nanoandme.org/nano-products/>. In this way products would be highlighted in the context of an impartial, easy to understand framework designed with the public in mind without over-hyping either the products or risk issues. We believe it provides the best platform currently available to highlight the information which may be useful to the public, whilst also building the confidence of business that the information they provide will not be misused. We urge the government to continue to fund Nano&me and use it for this purpose.

### Self-Regulation - The Responsible Nano Code is already fit for purpose

We agree with the Recommendation 19 that the government support voluntary codes of conduct, though this should in no way supersede the development of effective legislation for any applications using nanotechnology. However we believe there is already available a code created to a 'high standard' as their Lordships recommend - The *Responsible Nano Code*.

The *Responsible Nano Code* was developed, as the report recommends, in collaboration with relevant stakeholders in business, science and civil society organisations over a period of almost two years. Its development was sponsored by the Royal Society, Insight Investment, the NIA and the Nano KTN. Responsible Nano Forum director Hilary Sutcliffe ran its secretariat. Unfortunately the group, in conjunction with Cranfield University, were unable to raise funds to develop the effective monitoring & evaluation processes which are essential for such a Code. Outline details of the Code can currently be found on the website of one of its founding partners, the Nanotechnologies Industries Association: <http://bit.ly/5gjYYx> .

In the light of Committee's findings the Responsible Nano Forum urges the government to fund the further development of the monitoring and evaluation aspects of the Responsible Nano Code and its marketing and outreach in Europe. Evaluation methodologies and a benchmarking framework have already been developed, also collaboratively, and with minor amendment are available for use. Further details on these can also be obtained from the NIA or the Responsible Nano Forum.

## Public involvement - not another 'what do you think of nano' consultation!

We question the Committee's recommendation that the government commission a survey of public attitudes towards nanotechnologies in the food sector if that is manifest as basic polling - 'What do you think about Nanotechnologies in Food' in the style of some previous consultations, because we feel that has limited value. However, we concur entirely with the report that this dialogue must also be created to feed directly into policy and commercial development.

Our work on '*Future Foods*' with the members of the consortium of the European Commission funded NanoPlat project, <http://www.nanoplat.org/> indicates that an innovative approach to public involvement may be more effective. We propose an initiative which seeks to work collaboratively with both the public and government, scientists, food research agencies and companies to understand the likely and desired current and future applications of nanotechnology in food. These may then be recreated in a way the public can identify with, particularly through photography or film, and use specific information about potential benefits and safety issues of these as the basis for dialogue and debate.

We urge the government, the Food Standards Agency, food research agencies and food companies to take an innovative approach to dialogue and focus on specific and likely applications of the technology to form the basis of their engagement and to ensure that this is created to allow the public to directly influence the development of applications. Again this allows business to engage openly and transparently as recommended.

A proposal and pilot images, which may be used for such a dialogue, was developed in conjunction with the NanoPlat project and is available from the Responsible Nano Forum.

## Nano & Food Stakeholder Forum must improve on the DEFRA model

We agree in principle with the development of a Stakeholder Forum for Nano and Food, but it must significantly improve on the DEFRA model in its ability to influence policy and commercial development. The DEFRA Nano Stakeholder Forum has had only limited success, as indicated by its participants whose reflections which are incorporated into our recent report: *The DEFRA Nano Stakeholder Forum, Stakeholder Reflections, its history and its future impact* - available here: <http://bit.ly/5pN1Qs> .

We urge the government to learn the lessons of the Nano Stakeholder Forum outlined by stakeholders in this report before convening such a Forum and for stakeholders to be forceful in ensuring that this is created and run effectively.

ENDS

**NB: The views of the Responsible Nano Forum outlined here do not necessarily reflect the views of participating individuals and organisations.**

For clarification or further information, please contact Hilary Sutcliffe on 0207 520 9086 or email to [hilary@responsiblenanoforum.org](mailto:hilary@responsiblenanoforum.org). January 8 2010