President: **John Battams**General Secretary: **Ron Monaghan**Assistant General Secretary: **Amanda Richards**

Ref: Pamela Grassick

Nicola Hall (NICNAS)

*Submitted via email* [Nicola.hall@nicnas.gov.au](mailto:Nicola.hall@nicnas.gov.au)18<sup>th</sup> February, 2009

Dear Nicola,

**RE: NICNAS regulatory consultation on Industrial Nanomaterials**

The Queensland Council of Unions (QCU) supports the Victorian Trades Hall Council (VTHC) submission to the NICNAS on the proposed regulatory reform of industrial nanomaterials (NMs).

In particular, we support efforts to reduce the amount of uncertainty about the potential hazards that NMs may pose to workers, the environment and the general community.


The history of efforts to regulate potentially harmful substances within occupational health and safety (OHS) has shown that workers are exposed to new materials with useful industrial applications BEFORE adequate health impact information is known. Those who work with the unassessed materials therefore become an unwilling pool of subjects in the assessment of health effects. This was the case with asbestos and mounting evidence suggests that it could certainly be the case with NMs as well.

Current community ethical standards do not allow for the testing of unknown chemicals on prisoners, the intellectually impaired, ethnic minorities or other groups who were commonly used as test populations in the past. Workers however continue to be exposed to substances and materials seemingly without qualm. Any system of "assume safe" is unacceptable; the precautionary principle, rather than the body count principle, must apply.

The Australian Council of Trade Unions (ACTU) has taken an active interest in NMs. The ACTU established a working party and adopted a number of recommendations about NMs in 2009<sup>i</sup>. Among other matters, these recommendations called for the classification on NMs as new chemicals under the NICNAS and the adoption of the precautionary principle. The ACTU is also a signatory to the International Center For Technology Assessment *Principles for Nanotechnologies and Nanomaterials Oversight*<sup>ii</sup>. The QCU is affiliated to the ACTU, and therefore generally supports this policy position.

In summary, the QCU support the Victorian Trades Hall Council Submission in all details.

Yours faithfully,

  
Ron Monaghan  
General Secretary

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<sup>i</sup> ACTU media release

<http://www.actu.org.au/Media/Mediareleases/Nanotechposespossiblehealthandsafetyrisktoworkersandneedsregulation.aspx> ,  
and Factsheet [http://www.actu.org.au/Images/Dynamic/attachments/6494/actu\\_factsheet\\_ohs\\_-nanotech\\_090409.pdf](http://www.actu.org.au/Images/Dynamic/attachments/6494/actu_factsheet_ohs_-nanotech_090409.pdf) April  
2009

<sup>ii</sup> International Center For Technology Assessment Principles for the Oversight of Nanotechnologies and Nanomaterials

[http://www.icta.org/doc/Principles%20for%20the%20Oversight%20of%20Nanotechnologies%20and%20Nanomaterials\\_final.pdf](http://www.icta.org/doc/Principles%20for%20the%20Oversight%20of%20Nanotechnologies%20and%20Nanomaterials_final.pdf)

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