

# AN OPEN LETTER TO THE INTERNATIONAL NANOTECHNOLOGY COMMUNITY AT LARGE

## **Civil Society-Labor Coalition Rejects Fundamentally Flawed DuPont-ED Proposed Framework**

*Urges All Parties To Reject The Public Relations Campaign*

April 12, 2007

To All Interested Parties:

We, the undersigned, submit this open letter to the international nanotechnology community at large. We are a coalition of public interest, non-profit and labor organizations that actively work on nanotechnology issues, including workplace safety, consumer health, environmental welfare, and broader societal impacts.

DuPont Chemical Company (DuPont) and Environmental Defense (ED) jointly have proposed a voluntary “risk assessment” framework for nanotechnology. These groups intend to circulate their proposed framework both in the U.S. and abroad for consideration and/or adoption by various relevant oversight organizations, including the U.S. Environmental Protection Agency (EPA).

We reject outright the proposed voluntary framework as fundamentally flawed. We strongly object to any process in which broad public participation in government oversight of nanotech policy is usurped by industry and its allies. We made the decision not to engage in this process out of well-grounded concerns that our participation – even our skeptical participation – would be used to legitimize the proposed framework as a starting point or ending point for discussing nanotechnology policy, oversight and risk analysis. The history of other voluntary regulation proposals is bleak; voluntary regulations have often been used to delay or weaken rigorous regulation and should be seen as a tactic to delay needed regulation and forestall public involvement.

Nanotechnology’s rapid commercialization requires focused environmental, health and safety research, meaningful and open discussion of broader societal impacts, and urgent oversight action. Unfortunately, the DuPont-ED proposal is, at best, a public relations campaign that detracts from urgent worldwide oversight priorities for nanotechnology; at worst, the initiative could result in highly reckless policy and a precedent of abdicating policy decisions to industry by those entrusted with protecting our people, communities, and land. We strongly urge all who have an interest in nanotechnology’s future to reject this proposed framework. Respect for adequate worker safety, people’s health, and environmental protection demands nothing less.

Respectfully submitted,

American Federation of Labor and Congress of Industrial Organizations  
Beyond Pesticides  
Brazilian Research Network in Nanotechnology, Society and Environment  
Center for Environmental Health  
Center for Food Safety  
Corporate Watch  
Edmonds Institute  
ETC Group  
Friends of the Earth Australia  
Friends of the Earth Europe  
Friends of the Earth United States  
Greenpeace  
Institute for Agriculture and Trade Policy  
International Center for Technology Assessment  
International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco and Allied Workers' Associations  
Natural Resources Defense Council  
Sciencecorps  
Silicon Valley Toxics Coalition  
Third World Network  
United Steelworkers of America