

Safe-by-Design workshop

Wednesday November 9 2016



On November 9, 2016 a group of over 30 people representing a wide range of organizations such as businesses, academia, research and knowledge institutes, consultancy firms, branch organizations and the government convened at RIVM in Bilthoven.

The aim of the workshop was to stimulate a dialogue to exchange views on the concept of Safe-by-Design.

To this end in the morning and afternoon sessions a total of 6 pitches were given by Monique Bosman from the Ministry of Infrastructure and the Environment, Adriëne Sips from RIVM, Aaike van Vugt from VSParticle, Pim de Bokx from the Dutch Incubators Association, Maaïke le Feber from TNO, and Vincent Franken from NanoNow. Each of the pitches was followed by an open and very constructive discussion.

Views shared and discussed:

1. The concept of Safe-by-Design was discussed and seen as an approach that can be used supplementary and prior to regulation. A tailored and timely approach is required to enable regulation to help guide the production of safe nanomaterials and products prior to market entry. Safe-by-Design aims at such a timely dialogue between relevant stakeholders much earlier on in the innovation process. In this way insight can be obtained about potential risks and these can be monitored to guide decision making throughout material selection and product development.
2. Regulation of nanomaterials seems to be unable to keep up with the high speed of innovation. Through safe-by-design timely insight can be acquired by innovators and regulators with the ultimate goal to strive for negligible risks and to avoid product bans and even sanitation.
3. Implementation of Safe-by-Design early on in the development process can form an important pillar/cornerstone in making products and materials fit for a circular economy and offers a chance for smart innovation.
4. Ethics and public perception should be taken into account in Safe-by-Design.
5. For Safe-by-Design to be successful mutual interest should be known. Exchange of views should take place in trustworthy environments including representatives of all relevant stakeholders. Implementation of Safe-by-Design should be made transparent.
6. Safe-by-Design should provide a safety net for innovators to avoid confrontation with regulatory issues later on in the process, for investors and insurers to minimize uncertainty about health risks, for regulators to minimize casualties, and for safe products for society.
7. Safe-by-Design should appeal to responsibility but should not become a straight-jacket. Innovators should be up to date with the current state of affairs and should operate on a best effort basis. They should inform users about responsible use of their products, but they cannot be held accountable for actual use by their customers.
8. The questions that should be addressed in Safe-by-Design depend on the stage of the innovation process, the field of operation, and the ambition i.e. which problem does your product address.
9. A central location where up to date information on the safety of nanomaterials and their products can be found should be made available and all actors, not just the government should contribute. To succeed this process should be facilitated, although no conclusion was

drawn as to who should take on this role. The added value and willingness to contribute was expressed by the participants to the workshop.

10. This workshop was seen as a good start as many different views were shared in a very open and constructive manner. The participants agreed that the Safe-by-Design concept should be explored in more detail and indicated that a follow-up to this workshop would be very useful.

