

The UCSF Program on Reproductive Health and the Environment recently released a draft set of [policy recommendations](#) to address nanotechnology meeting for comments on May 5 in Oakland, CA.

The report is in draft form and the authors are seeking comment, so there will likely be a fair amount of modification as commenters with different perspectives and experience weigh in, but on the whole it does not seem to advance the ball very far.

The report provides useful, assessable background and a good overview of the science involved. The policy recommendations are on a whole logical and reasonable, but on balance raise significant design, implementation and resource issues that are largely unaddressed by the report. For example, Recommendation 7 calls for development of a framework for making policy and regulatory decisions, but provides no significant discussion of what that framework would look like, what agencies would design or implement it, or how it would be funded. Likewise, it recommends creation of a consumer labeling regime, a reasonable suggestion; yet it does not address the difficulties associated with such a system. Similarly, the report sets out some general recommendations for the state's Office of Environmental Health Hazard Assessment (OEHHA). While OEHHA should have a significant role to play in nanomaterial regulation under existing and future law, it is striking that the report does not focus on the role to be played by other agencies, such as the Department of Toxic Substances Control (DTSC), the Air Resources Board, and the regional water boards and air pollution control agencies. Particularly odd given the prominent efforts—such as a mandatory data call-in on carbon nanotubes—that DTSC has engaged in on the issue of nanotechnology. Also, the report recommendations tend to focus on consumer exposure, paying less attention to occupational exposures and ecological concerns. For example, while there is discussion of consumer labeling, there does not appear to be any substantial references to chain of commerce disclosure, or employee right to know recommendations. It will be interesting to see what form the final report takes.