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Charles Geraci, PhD, CIH
Associate Director for Nanotechnology
Nanotechnology Research Center
National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention

AIHA Comments on Proposed Survey of Engineered Nanomaterial Occupational Safety and Health Practices

Dear Dr. Geraci:

The American Industrial Hygiene Association® (AIHA) strongly supports NIOSH's proposed Survey of Engineered Nanomaterial Occupational Safety and Health Practices. NIOSH has played a leading role in nanomaterial occupational health and safety; this survey would help continue and improve these efforts. The data collected will help define research priorities and communication strategies to inform companies about better and worse protection strategies.

It bears noting that nanotechnology remains an emerging new technology with yet to be quantified risks, many of which may not have been fully qualified or identified. History provides us with numerous examples of other emerged technologies where the health, safety and environmental hazards and risks were not adequately known at the time, and later represented major impacts to the technology – and most importantly, to worker health and safety. The data proposed to be collected is thus part of a reasoned and prudent approach for risk management.

Just as AIHA supports the proposed data collection, we also have a suggestion for improvement. **In order to further enhance the data gathered, we recommend that the number of companies from which information is sought be increased by approximately five-fold.**

NIOSH intends to send the survey to 600 companies, and expects that 500 will complete it. This suggests a response rate of 83%. While response rates are difficult to predict and vary based upon multiple factors, increasing the number of potential respondents will also increase the likelihood of capturing data that accurately reflects the total population of companies, while at the same time decreasing reliance on a relatively high – and somewhat unpredictable – response rate.

Founded in 1939, AIHA is the premier association of occupational and environmental health and safety professionals. AIHA's 8,500 members play a crucial role on the front lines of worker health and safety every day. Our members represent a cross-section of industry, private business, labor, government and academia.

Thank you for your consideration of AIHA's comments and recommendations. Should you have any questions or desire additional information, please contact me at mames@aiha.org or (703) 846-0730.

Respectfully,

Mark Ames
Director of Government Relations
AIHA