

National Enabling Technology Strategy – Discussion Paper

ACTU submission

August 28, 2009

The ACTU welcomes the opportunity of providing written feedback on the NETS Discussion Paper, and note that we have also provided verbal input through two separate consultative forums and subsequent to these forums directly to Ms Alison Hemmings.

It is crucial that the government develop a comprehensive strategy for Australia's for the funding, governance and management of not only 'current' technologies such as nanotechnology and biotechnology, but also 'emerging' technologies. Such a strategy must ensure that technology development not only benefits Australia economically but does so in a manner which does not place workers, the wider community or the environment at risk. The development of technology must have as much wide community support as possible, and in particular the support of the union movement. As you are aware, the ACTU has concerns with the lack of protection under our current regulatory instruments for workers from the serious potential risks of working with engineered nanomaterials. There is no guarantee that employers will implement controls, much less have the information to provide to workers that they may be working with such materials. There are issues with labelling, information on MSDSs, measurement and control.

Consequently, the importance of such a strategy cannot be overstated. It is with concern therefore, that the ACTU notes the speed with which the consultation exercise was undertaken and the resultant problems. Many relevant stakeholders were not given the opportunity to participate in the consultation process and those that did were hamstrung by the process. Due to well-founded concerns with the process, much of at least the 'community' consultative forum was spent addressing these concerns.

The ACTU therefore strongly urges that the Enabling Technologies Policy Section (in the Department for Innovation, Industry, Science and Research) establish a small NETS oversighting committee to develop the draft strategy to submit to the Minister. This committee must have representation from unions, community groups, industry and government. This committee needs to be established immediately to ensure that the advice going to the Minister reflects the views of the stakeholders.

With regard to the four questions posed at the end of the discussion paper, the ACTU submits the following thoughts:

1 – What are the key issues challenges that need to be addressed by the National Enabling Technologies Strategy?

- Government must recognise the important and legitimate role of all stakeholders, and be prepared to facilitate engagement and involvement, providing resources where necessary.
- Consideration of the costs and benefits of development of any technology must include not only economic but also the social impact, the costs and benefits to society as a whole. Technology must be 'enabling' not only to industry but to society.
- The discussion of benefits and risks must not be based on consideration of available evidence/science-based risk information only. The ACTU policy position is that a precautionary approach must be taken. The two are not mutually exclusive. We are still

suffering the tragic outcomes of wholesale exposure to the ‘wonder-fibre’ asbestos – the parallels are too great to ignore.

- In discussion of costs/benefits, it is also important to ensure that the whole of life cycle is considered.
- As well as ‘foresighting’ or ‘horizon-scanning’ the strategy should ensure that there be an assessment of what has happened in the past, for example with gene technology. There is great community concern that the biotechnology regime is inadequate: there is no accountability, no tracking, but a perception that the benefits gained are commercial benefits, but the costs are shouldered by the community.
- There are many international models for technology foresight mechanisms – government can utilise work already done and must begin consultation with stakeholders on a model suitable for the Australian context. The development of a foresighting/assessment mechanism must be done in consultation with stakeholders, including where such a mechanism will ‘sit’. Finally, the final mechanism must allow for genuine participation of all stakeholders.
- There are many regulatory gaps and inadequacies. Regulation is not keeping up with technology. There is concern that the lag time to address these gaps and inadequacies will put workers and the community at risk. This is despite the work being currently undertaken by a number of government regulators. In the area of nanotechnology, the ACTU has called for labelling, MSDS information, and a register of all products imported into, supplied or manufactured in Australia containing engineered nano particles by *the end of this year*.

2 – How should these issues be addressed?

- Genuine participation and consultation through a Strategy Development Steering Group in the first instance and full participation in the foresighting/assessment mechanism
- Provision of timely information
- Broad, open, well-resourced community consultation, through stakeholder groups, including joint consultations with industry.

3 – What would you like to see as the main outcomes for the National Enabling Technology Strategy?

- Full participation of all stakeholders in policy and decisions regarding the development of enabling technologies
- The precautionary principle as the fundamental starting point
- Adequate and up to date regulation

5 – How do you think your organisation could work with the Enabling Technologies Policy and Public Awareness Sections and others to address those

- The ACTU is prepared to participate in the development and implementation of the strategy; in consultations; etc
- In all forums, the ACTU represents our affiliated unions and their members
- Where appropriate, the ACTU will take a role in disseminating information, seeking input from affiliates and so on.