

1 Considerations of Environmentally Relevant Test Conditions for Improved Evaluation of
2 Ecological Hazards of Engineered Nanomaterials

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111 **Abstract**

112 Engineered nanomaterials (ENMs) are increasingly entering the environment with
113 uncertain consequences including potential ecological effects. Various research
114 communities view differently whether ecotoxicological testing of ENMs should be
115 conducted using environmentally relevant concentrations—where observing outcomes is
116 difficult—versus higher ENM doses, where responses are observable. What exposure
117 conditions are typically used in assessing ENM hazards to populations? What conditions
118 are used to test ecosystem-scale hazards? What is known regarding actual ENMs in the
119 environment, via measurements or modeling simulations? How should exposure
120 conditions, ENM transformation, dose, and body burden be used in interpreting biological
121 and computational findings for assessing risks? These questions were addressed in the
122 context of this critical review. As a result, three main recommendations emerged. First,
123 researchers should improve ecotoxicology of ENMs by choosing test endpoints, duration,
124 and study conditions—including ENM test concentrations—that align with realistic
125 exposure scenarios. Second, testing should proceed via tiers with iterative feedback that
126 informs experiments at other levels of biological organization. Finally, environmental
127 realism in ENM hazard assessments should involve greater coordination among ENM
128 quantitative analysts, exposure modelers, and ecotoxicologists, across government,
129 industry, and academia.

130 **Introduction**

131 As nanotechnology (the synthesis, manipulation, and measurement of matter at 10⁻⁹
132 meter scales)¹ rapidly evolves,² engineered nanomaterials (ENMs) are entering air, waters,
133 soils,³ and sediments where they could adversely affect organisms to ecosystems.⁴⁻⁶ Actual
134 environmental impacts of ENMs have not been documented, and there are uncertainties
135 about the potential for, and how to evaluate, impacts.⁷

136 ENM ecotoxicology elucidates hazards and their mechanisms.⁸ The scope overlaps
137 with conventional ecotoxicology, although ENMs are particulate and diverse,⁹ with varying
138 cores, native or acquired surface chemistries,¹⁰ conditional agglomeration or dissolution,¹¹
139 and size- plus composition-dependent electronic properties,¹² affecting their reactivity and
140 biological interactions.¹³

141 Focusing ENM ecotoxicology invokes exposure scenarios^{14, 15} relevant to ENM
142 production,¹⁶⁻¹⁹ use,²⁰⁻²⁴ disposal,^{25, 26} and product release (Fig. 1).^{14, 27-31} Scenarios
143 consider environmental fate and transport,^{15, 32-39} bioavailability,^{40, 41} and ENM uptake into
144 ecological receptors.⁴²⁻⁴⁶ Scenarios also specify processes^{47, 48} and ecosystem services⁴⁹
145 such as food production.^{50, 51}

146 In conventional chemical toxicology, observed and perceived exposures often
147 diverge.⁵² In ENM ecotoxicology, water is emphasized, while soil and sediment impacts
148 have received less attention.⁵³ Where do exposures occur? What ENM forms⁵⁴ and
149 quantities are involved? Which ecological receptors are affected?⁵⁵ Which local exposure
150 conditions prevail? As with conventional chemical risk assessment, such questions unite
151 hazard and exposure assessments.^{15, 56}

152 Standardized test regimens do not derive from scenarios, since ENM test conditions
153 are predefined (e.g., aqueous chemistry, temperature, pH, experiment duration, among
154 others) for standardized endpoints.⁵⁷ Ideally, ENM hazards are studied at realistic
155 exposures for ecologically relevant receptors. An example would be studying real soils
156 under controllable yet realistic conditions, i.e. in greenhouses⁵⁸ or lysimeters.⁵⁹ However,
157 requiring absolute realism in all ENM ecotoxicology would pose scientific challenges
158 associated with: measuring ENMs analytically in environmental media; measuring toxicity
159 across a representative range of environmental conditions; characterizing environmental
160 ENM forms and their transformations so that toxicity is measured for representative
161 materials; ENMs altering physical or chemical exposure media conditions; and few efficient
162 approaches for estimating hazards and exposures necessary to evaluate risks before ENM
163 products develop. Another challenge is internal to the scientific community: multiple
164 dissimilar working definitions of environmental relevance intruding on scholarship,
165 including peer review.⁵³ Environmental relevance remains undefined, leading to
166 categorization of research around a few selected concepts.⁶⁰

167 Previously, over 600 published studies were examined to compare modeled or
168 measured environmental concentrations of ENMs versus concentrations administered in
169 ENM ecotoxicity assessments.⁵³ The study found nominal concentration disparities, but
170 also infrequent testing at low ENM concentrations. The study noted uncertainties in ENM
171 exposure modeling, and that other toxicity testing conditions beyond ENM concentration—
172 including aqueous chemistry, biological receptor, system complexity, and ENM form—
173 relate to real-world conditions. However, the study did not establish what constitutes
174 environmental relevance in the ecotoxicology of ENMs.⁵³

175 Issues regarding environmental detection, uncertain concentrations, and unknown
176 toxicity are not unique to ENMs; they are also raised for other emerging contaminants.⁶¹
177 However, because the ENM industry is rapidly evolving and scientists seek to assist in
178 advancing environmentally safe nanotechnology, environmental relevance in ENM hazard
179 assessment should be prioritized. To accomplish this, representatives from academia,
180 industry, and government regulation working in ecotoxicology, exposure modeling, and
181 social science (Table S1) addressed four questions within this critical review: (i) What
182 exposure conditions are used in assessing ENM ecotoxicity potential for model organisms?
183 (ii) What exposure and design considerations drive mesocosm experiments for
184 assessments of ENM environmental hazards? (iii) What is the state of knowledge regarding
185 ENM environmental exposure conditions, via measurements or modeling simulations? (iv)
186 How should concepts such as exposure conditions, ENM transformation, dose, and body
187 burden be used in interpreting biological and computational findings for assessing risks?
188 The main objective was to provide context and guidance to the meaning of environmental
189 relevance (singular or multiple meanings) in ENM environmental hazard assessment. This
190 critical review addresses the four motivating questions and expands on detailed topics that
191 emerged during the project (Supporting Information). For each question, there are findings
192 and recommendations. These serve to crystallize what is meant by environmental
193 relevance in ENM ecotoxicology, and further coalesce ENM environmental exposure and
194 hazard assessment endeavors.

195

196 **What exposure conditions are used in assessing ENM ecological hazard potential for**
197 **model organisms?**

198 Findings

199 Many systems, approaches, and conditions (including standardized testing with
200 model media, organisms, and endpoints)⁶² have been used to assess ENM ecotoxicity.⁶³ The
201 applicability and challenges of standardized testing protocols under aquatic conditions
202 have been reviewed^{57, 64} and vetted in workshops.⁶² Also, the OECD reviewed and vetted its
203 guidelines for testing ENMs⁶⁵ in an expert meeting.^{66, 67} Readers are referred to those
204 reports for deliberations of ENM standardized testing.

205 Research studies include laboratory-specific low-^{68, 69} and high-throughput dose-
206 response evaluations using select media with ENM compositional and receptor variants⁷⁰
207 for assessing uptake⁷¹⁻⁷³ and effect mechanisms.^{69, 74, 75} Investigations include mechanistic
208 gene transcriptional,⁷⁶⁻⁷⁹ DNA damage,⁸⁰ metabolomics profiling,⁸¹ and transgenerational^{82,}
209 ⁸³ experiments. Bottle-scale microcosms partially simulate limited levels of environmental
210 complexity,⁸⁴ e.g. in using natural soils or sediments with⁵⁸ or without^{85, 86} plants and
211 associated rhizosphere influences,⁸⁷ or using seawater⁸⁸ or marine sediments^{89, 90} and
212 associated receptors based on expected ENM compartmentalization.⁹¹ Non-standard
213 microcosms assess ecological endpoints, e.g. microbial community composition^{85, 92} and
214 function⁹² related to C and N cycling.^{92, 93} Environmental factors are examined, including
215 how ENMs interactively affect soil water availability⁹⁴ and soil bacterial communities.⁹⁵
216 Single-species experiments that assess ENM bio-association^{96, 97} or bioaccumulation^{71, 98}
217 precede and motivate using microcosms for assessing dual species trophic transfer⁹⁸⁻¹⁰¹
218 and potential biomagnification.¹⁰²

219 Pristine ENMs, including those with surface functionalization, capping agents, or
220 adsorbed species or coatings,¹⁰³ are the most frequently assessed, although released and

221 transformed versions are increasingly studied.^{28, 30, 104} Results for textiles, paints, and
222 nanocomposites¹⁰⁵ suggest that released particles significantly transform and age, and
223 exhibit different environmental behavior and effects compared to pristine ENMs.^{106, 107}
224 Assessing changes in form and associated behavior or activity across the material's life
225 cycle are uniquely challenging.

226 Nominal test exposure concentrations vary widely⁵³ (Fig. S1) and are sometimes
227 related to scenarios such as repeated applications,¹⁰⁸ accidental spills,¹⁰⁹ or ranges over a
228 spatial gradient.¹¹⁰ High exposure concentrations may be used:¹¹¹ for assessing
229 bioavailability in soil⁵⁸ in comparison to simpler media, or to accommodate analytical
230 instrument detection limits. High concentrations are also used to establish no-effect limits,
231 using limit tests; if an effect is not observed, the ENM is assumed to be non-toxic at lower
232 concentrations,⁶² although effects could occur at longer exposure times. However, this
233 approach is problematic if agglomeration and sedimentation of ENMs are concentration
234 dependent, or if effect mechanisms do not scale with concentration, which might occur if
235 organisms adaptively respond to toxicants.

236 Some challenges to ENM ecotoxicology are familiar to conventional chemical
237 ecotoxicology while others are unique. With conventional chemicals, toxicity is related to
238 the effective dose of a toxicant molecule crossing the cell membrane and disrupting
239 essential processes. However, ENMs can exert effects as particulates (e.g., physical effects)
240 and in a molecular or ionic form depending on the dissolution extent in the medium. The
241 effective ENM dose—which impacts the assay results¹¹²—may be unknown or changing
242 because it varies with media conditions or with dynamic physicochemical interactions of
243 receptors and toxicants.¹¹³ One effective dose metric may be insufficient to characterize an

244 observed effect that could be related to both a physical interaction of the ENM particulate
245 and the dissolved ionic form. Also, bioavailability and effective ENM doses¹¹⁴ change
246 because ENMs can transform abiotically¹¹⁵ and biotically^{116, 117} during assessment. While
247 such influences on stability exist in conventional ecotoxicology, stability in a particulate
248 exposure must also consider the ENM size distribution, and potential physical changes to
249 the ENM such as dissolution and agglomeration. Therefore, effective and nominal doses
250 may or may not be related.

251 Although multiple ENMs may co-occur in product formulations, different ENMs are
252 infrequently studied together ¹¹⁸ or with co-contaminants.¹¹⁹⁻¹²¹ ENMs can conditionally
253 sorb and modulate the toxicity and uptake of other contaminants and vice versa.¹²²⁻¹³⁴
254 ENMs can acquire coatings^{135, 136} such as natural organic matter (NOM),^{137, 138} and age with
255 varying pH and sunlight.^{139, 140} Assessment outcomes are affected by media chemistry,
256 physical characteristics, and additives (e.g., soil pH,¹⁴¹ temperature,¹⁴² or organic matter
257 content,^{108, 143} and dispersing agents in aqueous media¹⁴⁴). The exposure concentration at
258 the receptor and consequent effects¹⁴⁵ depend on ENM dissolution¹⁴⁶ perhaps assisted by
259 biotic ligands,¹⁴⁷ and speciation,¹⁰³ shed ions,¹⁰³ surface associations,¹⁴⁸ and
260 heteroaggregation with colloids and particulate matter,¹⁴⁸⁻¹⁵¹ or agglomeration and
261 settling.¹⁵² All of these vary with ENM types and their varying properties, and ambient
262 conditions.¹⁴⁸ Changes in ENM properties may change bioavailability^{94, 153} and toxicity.¹⁵⁴

263 Various test durations and endpoints have been studied, from acute responses
264 measured by standard test protocols¹⁴¹ to short term microbial biodiversity and
265 community composition effects¹⁰⁸ or plant genotoxicity^{111, 155} and nutrient composition
266 changes.^{156, 157} Multiple endpoints, toxicant characterization methods, and experimental

267 controls increase assessment comprehensiveness¹⁵⁸ and reduce artifacts and
268 misinterpretations.¹⁵² Experimental controls based on coatings and dispersants enable
269 determining if the apparent toxicity is attributable to the ENM itself or to ligand or surface
270 groups. Yet whether and how experimental controls are used varies widely, for example
271 metal salts that allow interpreting biological responses relative to ENM dissolution
272 products versus intact ENMs.^{159, 160}

273 The appropriate analytical method for quantifying, locating and characterizing
274 organism-associated ENMs depends on ENM chemistry and amounts or concentrations. For
275 ENMs exhibiting fluorescence or for ENMs containing heavy elements, high resolution
276 microscopy can assess biological uptake and compartmentalization.^{99, 102, 161-163} X-ray
277 synchrotron methods can sensitively locate bioaccumulated metal oxide ENMs¹⁶⁴ and their
278 transformation products in biota.^{117, 165} No single analytical tool is suitable for all ENMs;
279 however, the general lack of methodologies that can be routinely implemented to quantify
280 ENM exposure in complex matrices continues to be a major challenge to the fundamental
281 understanding of ecological effects.

282 Alternative testing strategies (e.g. miniaturized screening assessments using
283 environmentally relevant bacteria)¹⁶⁶ can simultaneously assess many material types,
284 controls, and concentrations,^{70, 75} which is useful for ENMs not available in sufficient
285 quantities for microcosms. However, the potential for interferences in screening assay
286 performance, depending on the specific ENM properties and toxicity test conditions,¹⁶⁷ are
287 increasingly recognized, and therefore should be controlled or accounted for in study
288 designs.^{152, 168}

289 To date, ENM ecological hazard assessments have not adequately explored
290 numerous well-conceived and plausible exposure scenarios that are founded in theory,
291 hypothesis, mechanism and occurrence probability; yet scenarios increase certainty and
292 predictability when addressing nanotechnology-related material safety. For instance,
293 hazard assessments have been mainly skewed towards as-produced ENMs without full
294 consideration of potential aging, since aging cannot be fully standardized in a realistic
295 context. However, such studies can and should further be conducted. Biological uptake, and
296 the compartmentalization and speciation of ENMs, are still infrequently studied, limiting
297 possibilities for attributing ENM exposure to effects at biological receptors.⁹ Varying
298 degrees of rigor have been applied in designing and incorporating controls that are
299 relevant to experimental questions or hypotheses. Varying degrees of attention are paid to
300 experimental artifacts. While great advancements have been made in ENM ecotoxicology,
301 improvements are needed to increase the environmental relevance of future research.

302

303 Recommendations

304 To understand hazards for plausible exposure initiation scenarios, assessment
305 conditions will need to depart from standardized testing protocols.^{62, 169, 170} It may be
306 helpful to link or compare data obtained for ENMs under plausible scenarios to those
307 obtained with standard methods using standardized media (e.g., standard soil mixtures) to
308 facilitate interpreting complex multivariate experiments or comparing results among
309 multiple laboratories. Herein, several recommendations regard exposure conditions that
310 should be used in assessing ENM ecotoxicity (Table 1).

311

312 *Adequately characterize exposure conditions.*

313 Soil ecotoxicity studies should specify the soil taxonomy¹⁷¹ and characteristics such
314 as pH, clay content, and organic matter content, using standard methods.^{108, 172} Similarly,
315 characterization of sediments should be provided. Natural soils and sediments are
316 preferred, because artificial media do not harbor natural soil communities, and do not
317 reflect chemical and physical characteristics (e.g. of specific surface area related to water
318 holding, or of organic matter content) that influence ENM effects and bioavailability. Water
319 characteristics determine ENM agglomeration, dissolution, and other behaviors affecting
320 aquatic system compartmentalization (e.g., residing in the water column or depositing into
321 sediments)⁹¹ and hence need definition. When adequately documented, media
322 characteristics can be used retrospectively to interpret conditional ENM bioavailability or
323 effect mechanisms.

324

325 *Determine and report the form and concentrations of ENMs.*

326 ENMs in testing should represent the particulate material form relevant to the
327 environmental scenario (i.e., as-produced materials near manufacturing sites, or as-
328 released with associated product surface coatings or with relevant co-contaminants in
329 waste streams, including industrial byproducts, Fig. 1). ENMs should be fully characterized
330 and their history (including storage conditions and time, or other uses that may affect
331 compositional or physical characteristics) should be adequately described to allow
332 comparing between studies. For toxic coatings,¹³⁶ coating identity and degree of coverage
333 should be related to observed effects. Impurities in ENMs introduced during product
334 synthesis and handling should be characterized, since they can sometimes account for

335 apparent ENM ecotoxicity.¹⁵² Nominal concentrations should scale according to exposure
336 scenarios, or to specific objectives such as mechanistic research or quantifying biotic
337 uptake. Dose verification, including size distribution and ENM concentration, is also
338 desirable, although heretofore challenging in soil and sediment exposures.

339 ENM physicochemical changes during release and in the environment should be
340 studied to uncover properties of ENMs that reach biological receptors. All potential forms
341 of ENMs, including transformation products and residual reagents used in synthesis,
342 should be accounted for, such that all toxicants can be related to biological responses.¹⁵²
343 Study designs should anticipate dispersing agent effects¹⁴⁴ and the nature of transformed
344 ENMs plus co-contaminants, by including controls to account for effects, fate, and kinetics
345 of ENMs in the test medium.¹⁵⁴

346 The ENM physicochemical states should be understood before conducting hazard
347 assessments.^{173, 174} This is important because some ENMs agglomerate or dissolve or
348 otherwise change in laboratory media, resulting in non-uniform exposures and uncertain
349 bioavailability. Such unevenness precludes relating measured effects to the applied dose.
350 Spatial bio-association, bioaccumulation,¹⁷⁵ and intra-organism compartmentalization
351 should be assessed (e.g., through imaging and mapping with sufficiently high resolution¹¹⁷)
352 to locate ENMs and their components.

353

354 *Relate biological receptors to the exposure scenario.*

355 Important advances have been made toward characterizing the physicochemical
356 factors influencing ENM behavior in environmental and test media, and towards utilizing
357 that information to develop standardized methods for conducting ENM ecotoxicity

358 testing.^{62, 64, 67, 152} However, aquatic or terrestrial species^{8, 159, 166} —and even different
359 species belonging to the same order¹⁷⁶ —respond differently to ENMs using the same tests.
360 Thus, test species and endpoints should be carefully chosen to enhance the relevance of
361 ENM ecotoxicity testing. Some complex interrelationships and dependencies between
362 species comprising ecosystems have been described.^{8, 159, 177} However, focused research
363 could rationally identify species for routine evaluations; likewise, the scientific rationale
364 behind test species should be reported. Ecosystems are more complex than conditions of
365 routine ENM ecotoxicity evaluations. Thus, research should define an optimal suite of test
366 species and endpoints to determine the ecosystem response to a given ENM.

367 In general, biological receptors should be chosen for expected exposures stemming
368 from realistic exposure scenarios. For example, relatively insoluble ENMs may, depending
369 on their density, size and agglomeration state, rapidly settle out of suspension and
370 associate with aquatic sediments. In that case, initial hazard assessment could focus on
371 benthic, rather than pelagic, receptor organisms.⁶² Conversely, for ENMs that rapidly
372 dissolve under environmental exposure conditions, conventional ecotoxicological exposure
373 scenarios may be applied and receptors chosen to assess dissolution product toxicity.
374 However, ENM dissolution rates vary, and pelagic organisms can be more sensitive than
375 benthic organisms.^{100, 101} Thus, both ENM compartmentalization and form must be
376 accounted for when choosing receptors.

377

378 *Select endpoints relevant to appropriate receptor and exposure scenarios.*

379 Multiple effects measurements¹⁵² should be applied to answer research questions.

380 Rapid screening assessments should be prioritized within a testing strategy (Fig. 2).

381 Mechanistically understanding overt toxicity is needed, which may require measuring
382 more omics⁸¹ endpoints (i.e., gene transcripts, proteins, and pathway metabolites) and
383 choosing variables for developing mathematical models to predict toxicity at untested
384 concentrations or conditions.⁸ Omics technologies can also identify potential modes of
385 action (MOAs) that are conserved among different species. However, different scientific
386 communities will have varying preferences in defining needs for omics-level investigations.

387

388 *Perform adequate dosimetry to understand exposures.*

389 Effects interpretation requires understanding the effective toxicant dose or other
390 (perhaps indirect) basis of impacts.⁹ For ENMs, the mass concentration basis of dosing may
391 relate only partially to the effective applied dose, since biological effects often originate
392 from surface interactions with receptors.¹⁷⁸ Furthermore, ENMs are more complex than
393 conventional chemicals because ENM shape, aggregation state and surface area may
394 influence toxicity.^{67, 178-182} Thus, surface area applied has been suggested as a supplemental
395 dosing metric.¹⁷⁸ However, ENM surface area in suspension/solid media is not a
396 straightforward assessment given that ENMs may aggregate with a size distribution that is
397 affected by the medium in which they are dispersed. In addition, coatings, either on pristine
398 ENMs or acquired in the test media or environment, may alter toxicity.^{104, 183}

399 ENM amounts and forms effecting biological impacts should be understood and
400 related to the administered dose to inform environmental risk assessment.^{9, 67, 184} This is
401 the essence of dosimetry in ENM ecotoxicology. As with other exposure concerns related to
402 hazard assessment, appropriate dose measurement depends on receptor and ENM
403 characteristics, which are scenario-dependent. For example, mammalian cells are harmed

404 by ENMs that become internalized, yet uptake pathways depend on ENM characteristics.¹⁸⁵
405 Then again, bacterial receptors that affect ecosystem-level processes may be impacted by
406 externally-associated ENMs at the cell membrane, or even in the surrounding environment.
407 In those cases, dosimetry relies on understanding ENM behavior in the complex media in
408 which bacteria reside (e.g., soil, water, sediments, and extracellular polymers^{186, 187}), which
409 is scenario-driven. Endpoint observations of ENM damage will also depend on ENM
410 processing in cells. During hazard assessments, understanding the history of biological
411 interactions with internalized, or otherwise associated ENMs may not be feasible. Yet
412 efforts should be made to measure and spatially associate ENM bioburden (quantity and
413 form) within biological receptors, and to examine the relationships of applied ENMs to
414 apparent effective dose and to effects.

415

416 *Summary*

417 Overall, it is not recommended to categorically exclude select conditions,
418 environmental compartments, protocols, receptors, or endpoints, since any may be
419 environmentally relevant. Rather, careful experimental designs around well-conceived,
420 plausible exposure scenarios should be emphasized; also, ENM characteristics that
421 influence biological responses under the dynamic conditions that occur in the environment
422 and in biota should be characterized and quantified. One could imagine identifying key
423 material-environment system determinants that could be systematically varied to provide
424 test results across relevant determinant ranges. Such ideas are not specific to ENM
425 ecotoxicology, but could establish defensible practices for making progress in hazard
426 assessment while the ENM industry rapidly advances.

427

428 **What exposure and design considerations drive mesocosm assessment of ENM**
429 **environmental hazards?**

430 Findings

431 Mesocosms are “enclosed experimental systems [that] are intended to serve as
432 miniaturized worlds for studying ecological processes.”⁸⁴ While the distinctions between
433 mesocosms and other experimental systems are not well delineated, mesocosms are
434 generally larger experimental units and inherently more complex than bench-top
435 microcosms or more simplified laboratory experiments.^{84, 188-191} Mesocosms for ENM
436 ecotoxicology are intended to increase the complexity of experimental systems, such that
437 more realistic ENM physical compartmentalization, speciation,¹¹⁷ and uptake into biota^{58,}
438 ¹⁹² can be achieved alongside biotic effects.^{89, 177} Also, the intent is to realistically
439 characterize ENM fates and interactions with environmental system components, and to
440 reveal fluxes among compartments of the ecosystems (e.g., the aqueous phase, sediments,
441 and biota in aquatic systems) responsive to internal system influences that are
442 unconstrained by investigator interventions.^{25, 177, 193}

443 Mesocosms have been used for testing relative biotic effects of ENM variants (e.g.,
444 surface functionalization, capping agents, adsorbed surface species or coatings),¹⁷⁷ and
445 discerning ENM effects separately from effects of dissolution products (ions or
446 complexes).¹⁹⁴ Mesocosm testing may occur following individual organism and microcosm
447 studies (Fig. 2). For example, to study how ENMs impact crops, one could first establish the
448 potential for hydroponic plant population impacts,¹¹¹ use soil microcosms to understand
449 ENM bioavailability via observing soil microbial community shifts,^{85, 93} and then scale up to

450 greenhouse mesocosms of soil-grown crops. This sequence could provide an understanding
451 of plant-microbe interactions,^{58, 87} ENM transformation and uptake in plants,¹¹⁷ and effects
452 on food nutritional quality.¹⁵⁷ Still, there are relatively few published studies using
453 mesocosms to assess ENM ecological hazards,⁵³ and the design and operating variables
454 (including size, media, biota, length of study, and ENMs tested) of existing mesocosm
455 studies are wide ranging.⁶⁰

456 By contrast, wastewater-associated ENMs,^{195, 196} and their transformations,¹⁹⁷⁻¹⁹⁹
457 effects, and fates²⁰⁰ in wastewater treatment plants (WWTPs),^{201, 202} along with the
458 potential for ENMs to impact WWTP processes,^{48, 203, 204} have been more extensively
459 studied. Since sewage contains ENMs, WWTPs are inherent forms of mesocosms.^{195, 205, 206}
460 Studies at entire WWTP scales elucidate ENM fates during wastewater treatment, including
461 significant association with biological treatment biomass^{201, 207} that becomes biosolids.^{76,}
462 ²⁰⁸ However, only 50% of biosolids produced in the U.S. are land-applied, and these
463 biosolids are used on less than 1% of agricultural land in the U.S.
464 (<http://www.epa.gov/biosolids>). Biosolids are land-applied even less in the European
465 Union.²⁰⁹ Thus, knowledge of ENM fates in WWTPs and how final residues are disposed
466 regionally are needed to develop plausible exposure scenarios.

467 Concerns with mesocosms include factors that can be difficult to control (e.g., pH or
468 oxygenation) and that mesocosms may respond to artifacts including “wall” or “bottle”
469 effects.⁸⁴ Further, mesocosms can conflate direct and indirect toxicant effects, typically do
470 not have a full complement of control conditions, and deliver inconclusive results (e.g.,
471 where bioaccumulation may be explicable by either direct toxicant uptake or by trophic
472 transfer). Biological communities in mesocosms also lack realistic ecological

473 interconnections, interactions, and energy flows. Nevertheless, outcomes can be improved
474 by using carefully designed mesocosms and associated experiments.⁸⁴ For example,
475 combined with analyzing mesocosm samples, performing practical “functional assays”³⁸
476 such as for heteroaggregation,²¹⁰ allows for anticipating phenomena and later interpreting
477 ENM transformation and compartmentalization in mesocosms.¹⁷⁷ Similarly, batch physical
478 association experiments—if conducted using realistic components, and over time frames
479 that allow for quantifiable mass transfer—can assess ENM biomass association and readily
480 suggest ENM fates in WWTPs.²⁰⁷ Still, hydrodynamic conditions are different in simplified
481 tests versus mesocosms, which are different from those in the natural environment.
482 Hydrodynamic conditions will impact ENM fate and transport and thus exposure
483 concentrations at receptor boundaries. The inability to capture real environmental
484 hydrodynamic conditions in any experimental scale is a general shortcoming for both
485 ecotoxicology and transport studies.

486

487 Recommendations

488 Although mesocosms do not fully simulate real environments,⁸⁴ mesocosms are
489 useful and should be employed, albeit judiciously due to their resource intensity, within a
490 strategy (Fig. 2). Recommendations regarding using mesocosms for assessing ENM
491 environmental hazards are provided in Table 2.

492 Mesocosm studies must be designed and conducted around well-conceived
493 questions related to plausible exposure scenarios; they should use select endpoints,
494 potentially including sensitive omics measurements,²¹¹ to answer questions or test
495 hypotheses.⁸⁴ Internal process and constituent characterization should be thorough and

496 equally responsive to well-conceived, realistic scenarios. Functional assays, i.e.
497 “intermediary, semi-empirical measures of processes or functions within a specified
498 system that bridge the gap between nanomaterial properties and potential outcomes in
499 complex systems”,³⁸ should precede mesocosm designs and experiments, and aid
500 interpreting mesocosm results (Fig. 2).

501 Mesocosm artifacts are avoidable by following best practices for design and
502 operation, although possible interferences of particulate material testing with assays must
503 be evaluated.⁸⁴ As for other hazard assessments, ENMs should be tested across the product
504 life cycle, (i.e., ranging from as-produced to released from products) within a motivating
505 exposure scenario. Similarly, suitable material controls should be used to test hypotheses
506 regarding ENM-specific effects (Table 1).

507 The recommendations made regarding exposure conditions in assessing ENM
508 hazard potentials for model organisms (including in microcosms) should be followed for
509 mesocosm studies (Table 1). Additionally, mesocosm designs should incorporate exposure
510 durations, which should be sufficiently long to address population growth, reproduction,
511 bioaccumulation, trophic transfer, and possibly transgenerational effects. Sufficient
512 measurements of ENM concentrations and time-dependent properties must be made for
513 clear interpretations.

514 Key to successfully interpreting mesocosm studies is using validated methods for
515 measuring ENMs in complex media. Measurements should include the size distribution,
516 concentration and chemical composition of ENMs in the test system, including biological
517 tissues,^{161, 212-214} over time.²¹⁵ In some cases, transformation products are inventoried
518 thoroughly during long term field-relevant exposures.¹⁹³ Detection schemes require sample

519 preparation to assess *in situ* exposures (e.g., aqueous or solvent extractions) before
520 quantitative analyses, or drying and embedding before visual confirmation by electron
521 microscopy. The potential for artifact introduction should be recognized. Recovery
522 methods continually develop, such as cloud point extraction for concentrating ENMs from
523 aqueous matrices.^{216, 217}

524 Depending on the exposure scenario, *in situ* aging may be a study objective.
525 However, it is important to define what ‘aging’ really means and the specific application
526 domain, since ‘aging’ is a wide-ranging term and can be used in different contexts, making
527 comparisons impossible. At least, studies should be undertaken over sufficiently long time
528 frames (e.g., acknowledging time scales of soil processes^{141, 218}), which may include
529 repeated ENM applications,¹⁰⁸ such that appropriate aging, i.e. time-dependent
530 transformation under realistic conditions, could occur. Alternatively, pre-aged ENMs could
531 be used. However pre-aging protocols (whether in the context of product use conditions or
532 under environmental conditions) are not yet standardized and, while some convention
533 could allow for comparing across studies, the appropriate aging protocol would depend on
534 the envisioned exposure scenario.

535 Co-contaminants should be considered and potentially introduced into mesocosms,
536 since some ENMs sorb, concentrate, and increase exposure to other contaminants.¹³⁰ Select
537 endpoints should account for ENMs as chemosensitizers.^{119, 120, 219, 220} Also, mesocosm
538 study designs should anticipate and plan for measuring secondary effects (e.g., rhizosphere
539 microbial shifts that affect plants⁸⁷ and soil nutrient turnover).

540 In summary, while few mesocosms have been used in assessing ENM ecotoxicity and
541 are also rare for conventional chemical testing, such systems potentially offer greater

542 realism. Still, mesocosm exposure and design considerations should derive from immediate
543 environmental applicability. The value of mesocosms to ENM ecotoxicology can increase by
544 following recommendations including: addressing context-dependent questions while
545 using relevant endpoints; considering and minimizing artifacts; using realistic exposure
546 durations; quantifying ENMs and their products; and considering ENM aging, co-
547 contaminants, and secondary biological effects (Table 2). Further, it should be
548 acknowledged that mesocosms do not fully recreate natural environmental complexity. For
549 example, aquatic mesocosms do not recreate actual environmental hydrodynamic, or
550 temperature cycling, conditions. Hydrodynamics can significantly impact ENM aggregation
551 or heteroaggregation, and fate and transport (e.g., sedimentation, dissolution, etc.).
552 Therefore, potential impacts on the resulting concentrations at the receptor boundaries
553 should be considered.

554

555 **What is the state of knowledge regarding ENM environmental exposure conditions,**
556 **via measurements or modeling simulations?**

557 Findings

558 ENM environmental exposure conditions herein refer to where, how much, and in
559 what forms ENMs may occur in the environment. These are central issues for ecotoxicology
560 of ENMs because they suggest test exposure scenarios^{14, 15, 18} in which ENMs could impact
561 biological receptors within environmental compartments (e.g., soil, sediments, air, and
562 water) influenced by various factors (e.g., pH, redox potential, aeration, temperature, and
563 ionic strength). These issues also influence outcomes of key regulatory concern:
564 persistence, bioaccumulation, and toxicity.

565 In the parlance of exposure science,^{221, 222} three knowledge domains inform
566 ecotoxicology, including the ecotoxicology of ENMs⁶:

- 567 1) “far-field”²²³ “environmental science”²²² regarding contaminant release,
568 transport, fate, and transformation external to biological receptors;
- 569 2) “near-field”²²³ exposures at the receptor that lead to biological outcomes, as
570 affected by contaminant bioavailability, affinity, uptake, accumulation, and
571 biological transformation; and
- 572 3) “at point” responses and outcomes that occur at the biological receptor and
573 include toxicity (Fig. 3).

574 Discharges (locations, types, and amounts) underpin exposure scenarios,^{14, 15, 37, 224}
575 are initiated by situational contaminant releases (Fig. 1), and are referred to as source
576 terms. Mass balance-based multimedia simulations²²⁵ mathematically account for released
577 contaminants as they are transported and exchanged between environmental media,
578 where contaminants may be transformed and may ultimately concentrate, potentially with
579 altered compositions and structures (Fig. 3).

580 Far-field exposure modeling approaches vary by question, the modeling purpose
581 (e.g., regulatory compliance, priority setting, research, material design, or industrial use),
582 the required spatial resolution (e.g., a site or region, and the need to resolve environmental
583 heterogeneity), the temporal conditions (e.g., steady state, dynamic, or episodic), and the
584 predictive accuracy required.^{56, 226} Material Flow Analysis (MFA), which is a type of life-
585 cycle inventory analysis, has been advanced to track ENM flows through various use
586 patterns into volumes released into broad environmental compartments,²²⁷ scaled to
587 regional ENM concentrations that release via WWTPs to water, air, landfills, and soil.²²⁷

588 Such models estimate exposure concentrations in part via engineering assumptions and in
589 part via heuristics (i.e. expert judgment regarding the potential amount released to various
590 media).²²⁸ Also, such material flow analysis models depend on the underlying data (e.g.
591 production and release estimates) which are not readily available, making it difficult to
592 validate model results and potentially leading to inaccurate estimates.^{32, 228}

593 Multimedia models for ENMs^{32, 37, 228-230} can predict environmental concentrations
594 based on sources of continuous, time-dependent, or episodic releases^{32, 228} and are similar
595 to multimedia models that predict environmental concentrations of organic chemicals²³¹⁻
596 ²³³ and particle-associated organic chemicals.^{233, 234} For ENMs, predicting particle size
597 distribution—as affected by particle dissolution, agglomeration, and settling—is desired
598 for various spatial and temporal endpoints. For one integrated MFA and multimedia model
599 (MendNano and LearNano), user-defined inputs are flexible around product use and ENM
600 release throughout material life cycles.²²⁸ It is noted that although validation of multimedia
601 models is a formidable task, various components of such models have been validated as
602 well as model predictions with such models for particle-bound pollutants.

603 Most far-field²²³ models of ENMs have major challenges. First, the quantities and
604 types of ENMs being manufactured are unknown to the general public due to issues
605 surrounding confidential business information, leading to a reliance on market research.⁵³
606 The resulting public uncertainty will persist while nanotechnology continues a course of
607 rapid innovation, as is typical of new industries.²³⁵ The rates of product use and ENM
608 releases at all life-cycle stages (i.e., manufacturing, waste handling, product use, and
609 product disposal) are also not defined.²²⁵ There are challenges associated with modeling
610 transport processes through specific media and across media (i.e., water, soil, air), highly

611 divergent time scales of processes, lack of required input parameters, and the need for
612 validation of results (e.g., through measurements of ENMs in the environment).²²⁶ Several
613 multimedia models developed for conventional chemicals could be adapted around ENMs,
614 but few account for fate processes specific to nanoparticles (e.g., never in thermodynamic
615 equilibrium).^{37, 236} In addition, various transport models for a single medium and in the
616 multimedia environment could be adapted for far-field analysis of ENMs, but few account
617 for fate processes distinctive to ENMs (e.g., considering the complexity of ENMs
618 aggregating and that their transport is governed by physical rather than thermodynamic
619 driving forces).^{37, 236} Moreover, their validation, which would require ENM monitoring data,
620 is a major challenge.

621 The lack of understanding of many fundamental ENM behaviors under
622 environmental conditions propagates into broad uncertainties, for example in predicting
623 ENM removal to solids or aqueous fractions in WWTPs.^{225, 227} ENM surface chemistries
624 fundamentally affect ENM agglomeration or dispersion²³⁷ and likely affect bioavailability.⁹⁴
625 Some species on ENM surfaces may degrade in the environment,²³⁸ while other adsorbates
626 can be acquired.^{239, 240} Carbonaceous ENMs may be transformed or degraded by
627 environmental processes such as photo-,^{241, 242} enzymatic,^{243, 244} chemical,²⁴⁵ and bio-
628 degradation.²⁴⁶ Redox and other environmental conditions will affect nanomaterial
629 surfaces, which for nano-Ag includes formation of sulfide that inhibits dissolution.^{39, 247}
630 Surface chemistry also affects transformation rates of primary particles and aggregates
631 (e.g., in WWTP biological processes).²⁴⁸ For many ENMs such as nano-ceria,²⁴⁹ reactivity is
632 highly size-dependent. To accurately model material fates thus requires understanding
633 how material surface properties affect integrity, how both change under varying

634 environmental conditions such as pH, clay content,²⁵⁰ and organic matter content,^{143, 251}
635 and how surface properties and particle reactivity affect physicochemical processes that
636 are parameterized in far-field models. This is especially true for ENMs used as pesticide
637 delivery mechanisms, including carbon nanotube composites with specifically-reactive
638 surface monomers. Yet only recently has modeling attempted to address differing
639 properties of a material's structural variants (e.g., photocatalytic versus photostable nano-
640 TiO₂).²³⁰

641 Evaluating computational model predictions is a challenge for ENMs, which
642 presently are estimated to occur in the environment at low (ng/L, to mg/L)
643 concentrations.^{32, 230, 252-254} Also, detection methods for ENMs in environmental media and
644 distinguishing ENMs from natural chemical analogs are still under development,^{161, 255-257}
645 with more evaluation strategies needed including a framework for validating new ENM
646 analytical detection methods.²¹⁵ Fullerenes from incidental sources (combustion products)
647 were quantified in river sediments collected from locations across the globe²⁵⁸ and
648 quantified in the atmosphere over the Mediterranean Sea.²⁵⁹ Perhaps related to a viable
649 exposure scenario, fullerenes were quantified at relatively high concentrations in treated
650 wastewater effluent²⁶⁰ and at ng/L to µg/L²⁶¹ concentrations in river waters receiving
651 effluent discharge. While not necessarily nanoscale, similarly high concentrations of TiO₂
652 were reported for sediments sampled near a WWTP outfall.²⁶²

653 The greatest uncertainty in ENM exposures is near-field (Fig. 3), at the receptor
654 where toxicant dose manifests as internal dose. Heteroaggregation is a dominant fate
655 process for ENMs when they interact with natural colloids.^{37, 263-265} Given sufficient
656 residence time for ENMs in environmental matrices, heteroaggregation (i.e., kinetically-

657 controlled association with colloids) and to a lesser degree homoaggregation will affect
658 localized compartmentalization, including stability in the water column and therefore,
659 sedimentation.¹⁷⁷ However, these processes do not preclude biological impacts under
660 simulated environmental conditions, as has been shown for nano-ceria in a complex
661 aquatic mesocosm.¹⁷⁷ Exposure can be confirmed by quantifying receptor body burdens,
662 thereby allowing for quantitatively relating near-field exposure to biological effects.¹⁷⁷
663 Thus, in the absence of detailed, biologically complex, near-field models for local exposures
664 to environmental receptors, the ability to trace ENMs to biological receptors sampled
665 directly from the environment becomes the best available approach to relate far-field
666 exposures to biological impacts.¹⁷⁷

667 Overall, material flow models and multimedia modeling of ENMs have advanced to
668 inform ENM ecotoxicology. Available far-field modeling frameworks are adaptable to
669 changing inputs despite uncertainties in production volumes. Major uncertainties remain
670 at the nexus of ENM surface and core chemistries as related to nanomaterial transport,
671 aggregation, and degradation characteristics. However, fundamental research (e.g., of
672 conditional hetero- and homoaggregation, and of dissolution) is needed to discover and
673 parameterize complex fate processes. New approaches, such as assays that can be used to
674 rapidly probe surface associations,³⁸ demonstrate how to populate far-field models and
675 how to determine near-field exposures associated with effects. Although existing models
676 can simulate particle movement, deposition, and some transformations, the knowledge
677 state regarding ENM environmental exposure conditions via measurements or modeling
678 simulations cannot be assumed to accurately represent actual conditions at biological
679 receptors.

680

681 Recommendations

682 Despite significant progress in modeling potential ENM environmental distributions,
683 several key constraints exist. Models predict the average concentration within broad
684 compartments such as soils, sediments, water, or wastewater, even when constrained to
685 regional releases. Actual concentrations at biological exposure sites are typically unknown,
686 but can be constrained within upper and lower bounds. Due to the potential for bio-
687 association, bioaccumulation, and hetero- or homoaggregation, predicted environmental
688 ENM concentrations may inaccurately estimate bioactive concentrations at receptors.
689 Following are recommendations for using measurements or modeling simulations to
690 understand conditions of ENM environmental exposures.

- 691 • The limitations of modeling approaches should be recognized more broadly, such that
692 generic model predictions are not used to rigidly define or judge ecotoxicity testing
693 conditions.
- 694 • Modeling should be simplified where possible and coupled with evaluation and
695 iteration while varying assumptions to develop an understanding of the sensitivity of
696 modeling parameters.
- 697 • Meteorological conditions play an important role in ENM transport, and thus should be
698 carefully documented when assessing model predictions relative to monitoring.
- 699 • ENM surface characteristics relevant to the receptor and the exposure context should
700 be considered by modelers and experimentalists. Considerations should include: which
701 ENM characteristics prevail near receptors, how this changes in the environment, and
702 how particle stability, migration and bioavailability are affected.

- 703 • Batch experimental approaches to rapidly assess relationships between environmental
704 factors (e.g., pH, redox potential or aeration, ionic strength, and organic matter content)
705 and ENM physicochemical characteristics that affect fate processes (e.g., homo- and
706 heteroaggregation, sedimentation, and dissolution) could be more routinely
707 incorporated into assessments (Fig. 2), to justify further testing and for interpreting
708 other testing results.
- 709 • Improvements in quantifying ENMs in complex media, including biological tissue, are
710 needed to validate multimedia models and to determine near-field exposures to
711 biological receptors.
- 712 • Improved fundamental understanding of how ENM variants (e.g., in transformable
713 coatings, shapes, sizes, or primary chemistry) comparatively migrate under varying
714 environmental conditions can be advanced through research that intentionally
715 develops and uses relatively stable ENMs as tracers.^{188, 189, 266}

716 In summary, understanding exposure conditions should continue to improve from
717 fundamental experimental research of ENM environmental behaviors. Modeling should
718 continue to improve with such understanding, and avenues for model evaluation should
719 continue to grow. Environmental relevance in ENM ecotoxicology need not be defined or
720 constrained by model outputs, especially given recognized uncertainties and the need for
721 continued model evolution. Lastly, echoing prior recommendations,¹⁵ the efforts of
722 exposure modelers, analytical methods developers, and ecotoxicologists should continue to
723 influence each other for maximum individual and mutual benefit.

724

725 **How should concepts such as exposure conditions, ENM transformation, dose, and**
726 **body burden be utilized in interpreting biological and computational findings for**
727 **assessing risks?**

728 Findings

729 Many of the outstanding research issues and recommendations for evolving ENM
730 ecotoxicology (Tables 1 and 2) are echoed in the discourse for other chemicals of emerging
731 concern (CECs).²⁶⁷ These include the need for systematically understanding ENM and
732 decomposition product toxicity across various receptors within linked levels of biological
733 organization,^{8, 268, 269} quantifying actual exposures²⁷⁰ and uptake²⁷¹ into environmental
734 receptors,^{57, 161} gaining mechanistic insights into and biological markers for acute and
735 chronic low level exposures,^{272, 273} and understanding how environmental factors including
736 co-contaminants affect ENM transformation²⁷⁴ and biological impacts. Still, how can the
737 potential for exposure and impacts of ENMs be anticipated, prevented, managed, or
738 mitigated? Further, what data and tools do decision makers need to inform their work?
739 Innovation in nanotechnology hinges on having the science to evaluate ENM safety.

740 While no formalized process for incorporating all exposure conditions and concepts
741 of ENM transformation, dose, and body burden into risk assessments currently exists, a
742 proposed framework approach to risk characterization over the life cycle of ENMs has been
743 published and is available.⁶³ This framework advocates an initial decision cut-off in regards
744 to exposure; in the absence of exposure, the need for further assessment is diminished or
745 negated.^{26, 63} In this available framework, ENMs that are certain to rapidly dissolve into
746 ionic components in a destined environmental compartment would be assessed for risk
747 based on the released components rather than the original nanoparticles.⁶³ Persistent

748 ENMs are expected to accumulate in matrices such as sediments.⁶³ The consequences of
749 ENMs to successive generations, biodiversity, and ecosystem services⁴⁹ are not addressed
750 by model organism-specific assays of discrete growth and mortality.^{8, 63} Nonetheless, in this
751 available framework, toxicity endpoints associated with standardized testing protocols for
752 sediment, aquatic, and terrestrial standard population-level endpoints over short and long
753 time frames are advocated for assessing hazards of simulated ENM concentrations in the
754 environment.⁶³ In this framework, sunlight is an environmental variable, bioaccumulation
755 is measured, and ENM modifications during product and material life cycles that may
756 change bioavailability are considered.⁶³ While such a framework has broad organizational
757 appeal, priority setting within the framework is required and thus could focus on tests that
758 are relatively well aligned with likely exposure scenarios.

759 Even with a risk assessment framework that considers ENMs across product life
760 cycles and considers sediments, water, and soil in testing endpoints,⁶³ major hurdles hinder
761 regulatory agencies, and research scientists, in using concepts such as exposure conditions,
762 ENM transformation, dose, and body burden in interpreting biological and computational
763 findings for assessing risks. Toxicity tests developed for dissolved chemicals typically
764 require significant modification for use with ENMs.⁵⁷ Tests may not apply to ENMs if they
765 are not appropriate for solids.²⁷⁵ Additional scientifically-based hazard information from
766 the peer-reviewed literature may or may not be available for consideration. ENMs used in
767 ecotoxicity tests, which are sometimes laboratory-synthesized to overcome uncertainty
768 regarding proprietary coating or other commercial formulations, may be insufficiently
769 analogous to allow for extrapolating information or risk comparisons.

770 Issues include the need to know test material characteristics and how they relate to
771 testing results and the ENM life cycle. Even if an initial risk assessment considers ENM
772 solubility,⁶³ ENM dissolution is not instantaneous; therefore, at what stage of dissolution
773 does the contaminant no longer pose a hazard as an ENM? Also, where biological impacts
774 stem from ENM surface characteristics, how can mass concentration be used to judge
775 hazards? Environmental ENM effects in benchtop experiments can be indirect, stemming
776 from physical nutrient depletion,¹⁵² or amplifying organism uptake of co-contaminants.²⁷⁶
777 Other indirect physical effects derive from ENMs adhering to the organism surface,²⁷⁷ light
778 shading,²⁷⁸ or internal food displacement.⁹⁹ Near-field exposures (Fig. 3) can result in
779 biological hazards from specific ENMs based on their properties (e.g., electronic).^{75, 279}

780 By definition, ecological risk assessment (ERA) is “the process for evaluating how
781 likely the environment will be impacted as a result of exposure to one or more
782 environmental stressors.”²⁸⁰ ERA involves predicting effects for individuals, populations,
783 communities and ecosystems, and concerns itself with valuable⁴⁹ ecosystem services such
784 as nutrient cycling.²⁸⁰ Thus, conducting ERAs for ENMs could benefit from an ecological
785 outlook. All levels of biological organization, and interactions between them, would be
786 considered when assessing responses to ENM exposure (Fig. 3).

787 Release and exposure scenarios (Fig. 1), use of functional assays for assessing
788 environmental compartmentalization (Fig. 2),³⁸ and combined life-cycle and multi-media
789 modeling²²⁸ have important roles in focusing ENM ecotoxicology. Less recognized is that
790 mechanistically based models of dynamic biological effects are informed by hazard
791 assessment research. Different types of process-based, dynamic models (e.g., Adverse
792 Outcome Pathway or AOP,^{281, 282} and Dynamic Energy Budget or DEB²⁸³) allow for

793 predicting effects from exposures stepwise, starting at subcellular levels, into individuals,
794 through populations, and conceivably to communities and ecosystems. Developing process-
795 based models requires researching key effects processes^{71, 284, 285} and ecological
796 feedbacks.¹⁵³ Models are formalized to describe interactive processes culminating in
797 toxicity such as reactive oxygen species (ROS) generation and cellular damage. Process-
798 based mathematical expressions evolve with empirically-based discoveries or through
799 model reconciliation with experimental data. Parameters are independent of toxicity
800 testing protocols, although models could be informed by standard test results. Thus, ENM
801 ecotoxicity research could support predictive toxicology by informing and populating
802 process-based, dynamic ecological effects models.

803 A comprehensive fate and effects research agenda is needed for addressing ENM
804 quantification in complex media.^{286, 287} Such an agenda has allowed for assessing
805 experimental compartmentalization,²⁸⁸ and sensitively assessing environmental
806 persistence,²⁸⁹ toxicity, bioaccumulation,^{287, 290} trophic transfer,²⁹¹ and indirect effects from
807 the uptake of ENMs coated in other hazardous materials.^{292, 293} Such research could
808 substantially inform ENM risk assessment for a relevant environmental exposure scenario.
809 However, most ENMs have not been studied comprehensively along the entire exposure
810 and effects continuum (Fig. 3). Further, the approach is not sustainable. Rather, the need is
811 to develop efficient approaches applicable within an overall approach to rapidly evaluate
812 the large number of ENMs under commercialization (Fig. 2). A research agenda that focuses
813 on distilling key determinants of exposure and hazard for ENM-environment systems that
814 can be measured experimentally would be most compelling.

815 Thus, while the science of ENM ecotoxicology and exposure characterization has
816 advanced, there are disconnects between how regulators review ENM-based products for
817 environmental safety and the research that is conducted to evaluate hazards. Except for
818 results published in open source outlets or directly reported, research may be unknown to
819 government bodies. Ongoing synthesis of published research results is challenging due to
820 high variability across study conditions and ENMs tested, and due to effort needed to
821 regularly update such comparisons. Moreover, there is a systematic resistance to
822 publishing “no effect” studies in the peer-reviewed literature.²⁹⁴ As a result, relying only on
823 published research to inform regulatory decisions can present challenges. A life cycle-
824 based framework facilitates exposure modeling and hazard testing to support risk
825 assessment. However, extrapolation of effects to untested concentrations, study, or
826 environmental conditions, and across biological levels of organization, requires
827 understanding dynamic biological process-based effects, which current standard tests
828 neither deliver nor sufficiently inform. Ultimately, exposure scenarios are useful for
829 framing and focusing ENM ecotoxicology, and some version of a tiered intelligent testing
830 and risk assessment (Fig. 2) strategy is needed.

831 Such a conceptual tiered strategy considering the impact of the ENMs’ varying
832 properties on ecological risks at different life cycle stages was proposed in the EU FP7
833 MARINA (Managing Risks of Nanoparticles) project²⁹⁵ and is being further developed in the
834 EU NANoREG programme. This strategy considers several domains (exposure, fate,
835 kinetics, and hazard) represented by specific tools ranging from relatively simple in the
836 lower tiers to more complex and specific in the higher tiers. The framework aim is to
837 structure information collection and generation for cost-efficient risk assessment,

838 compliant with 3R animal-use testing principles (i.e., replacement, reduction, and
839 refinement), which should also be pursued by means of grouping ENMs.

840 A strategy for grouping ENMs based on releases, uses, physicochemical properties,
841 bioaccumulation, bioavailability, and effects for both human and ecological risk assessment
842 is currently in development across a number of EU research projects such as MARINA,
843 NANoREG, SUN, and GUIDEnano. These efforts have been challenged by the complexity of
844 ENM identity and interactions, but this approach is necessary, as the costs for safety
845 assessment on a case-by-case basis would be exorbitant.²⁹⁵ Therefore, a vision on ENM
846 grouping is needed, which should apply in a regulatory context.^{296, 297} Applying grouping in
847 regulatory risk assessments should enable read-across, i.e., filling a data gap by using
848 information on one ENM, or a non-ENM, for another substance in the same group.

849

850 Recommendations

851 The abovementioned tools should be fitted into a risk assessment strategy for ENMs.
852 This strategy should be flexible enough to address different assessment goals depending on
853 the user's needs, considering all data already available as a starting point, contingent upon
854 data quality evaluation²⁹⁸ and selecting the most appropriate tools to fill existing data gaps.
855 Such a strategy should ideally be exposure-driven, starting with identifying the most
856 relevant exposure scenarios in the ENM life cycle, and evaluating completeness and quality
857 of the available data from a risk assessment perspective. This facilitates careful
858 prioritization of ENMs to optimize testing efforts and can inform more realistic
859 ecotoxicological investigations. Doing so can allow one to screen-out irrelevant exposure
860 routes, eliminate unnecessary testing, and support prioritization of exposure scenarios.

861 Exposure assessment should begin with an analysis of plausible exposure scenarios; where
862 none is expected, further testing may be precluded for the applicable use patterns and
863 volumes.^{26, 63} Researchers and regulators need to understand actual exposures at biological
864 receptors. This exposure-driven approach can also provide important information on
865 realistic environmental conditions to affect test designs for improved interpretation of
866 laboratory toxicology studies. Such practices can ensue in the interim, while research
867 continues to discover best hazard assessment practices.

868 Experimental ENM toxicity assessments, using ecologically relevant receptors and
869 across linked biological levels of organization, should inform developing and
870 parameterizing dynamic process-based models. Such models should respond to future
871 scenarios and predict impacts. ENM characteristics, exposure conditions, and ENM
872 transformation, dose, and body burden should be used in interpreting biological and
873 computational findings for assessing ENM risks. ENM test results should be benchmarked
874 to results for appropriate controls to establish relative hazard (e.g., comparing dissolving
875 ENMs to their dissolution products or comparing persistent ENMs to non-nano analogs).
876 This applies to pinnacle concerns in ecological fate assessment of bioaccumulation,
877 biomagnification, and biopersistence.²⁹⁹

878 How to develop, interpret, and use pertinent information in ENM environmental
879 risk assessment is a larger issue that should become part of an extended dialog among
880 regulators, industry, civil society organizations, researchers, and other societal members so
881 that the fundamental research will inform decision making. Collaborative decisions are
882 recommended for focusing ENM ecotoxicology towards relevant scenarios, including

883 testing the most relevant materials throughout ENM life cycles and employing appropriate
884 hazard assessment approaches, towards meaningful ecological risk assessment.

885

886 **Summary and Outcomes: Towards Defining “Environmental Relevance”**

887 The overarching question motivating this critical review was: how can we ensure
888 that hazard assessment in ENM ecotoxicology is as environmentally relevant as possible?

889 The answer requires considering how ecotoxicity tests are performed, what constitutes
890 pertinent concentration and test conditions for ENMs (Table 1), the main biotic and abiotic
891 attributes of the environment, how ecologically oriented hazard assessment is undertaken
892 (Table 2), and how the resulting information should be interpreted. Answering this
893 question yielded three primary insights. First, environmental relevance is informed by a
894 logical consideration of what exposures might occur, to which receptors, and to what
895 outcomes. The consideration should begin with a plausible release and exposure scenario
896 (Fig. 1), and use best available knowledge and technologies to develop the full assessment
897 approach. Concerns regarding ENM concentrations used in hazard assessments are
898 paramount, but are not the only concerns. ENM concentrations should be selected to assess
899 potential effects, but overly high concentrations that fundamentally change media
900 conditions should be avoided. Still, concentrations ranging above and below predicted ENM
901 average concentrations must be assessed for understanding potential organismal effects,
902 underlying mechanisms and their concentration dependencies, and for informing process-
903 based dynamic biological effects models. In addition to the nanomaterial, the conventional
904 material (e.g., dissolved metal) should be tested. ENM distributions and fates in broad
905 environmental compartments do not equate to concentrations and forms near, or effective

906 at, actual biological receptors.¹¹⁴ Therefore, research results on ENM effects should not be
907 disregarded on the limited basis of environmentally relevant exposure concentrations
908 when the study conditions were predicated on a broader hypothesis.

909 In addition to tethering ENM ecotoxicology to exposure initiation scenarios (Fig. 1),
910 the concept of employing tiered approaches in hazard and risk assessment resonated (Fig.
911 2). Multi-stage approaches to ENM hazard assessment are advocated.¹¹⁴ A highly developed
912 tiered approach for health and safety testing of nanotechnologies has been published²⁶ and
913 strategies for tiered risk assessment and grouping are underway.^{295, 297, 298} Staging ENM
914 ecotoxicology efforts, such that potential interactive impacts at all levels of biological
915 organization (Fig. 2 and 3) are evaluated, could simultaneously inform risk assessment and
916 predictive process-based effects model development. As some ENMs can cause biological
917 impacts from ENM properties or characteristics,³⁰⁰ ENM ecotoxicology should be oriented
918 to logical exposure initiation scenarios (Fig. 1) based on ENM life cycles, via testing tiers
919 (Fig. 2). Finally, coordination is recommended among multiple disciplines in ENM
920 environmental analysis, fate and transport modeling, and hazard assessment, towards
921 rapidly advancing research using tiered approaches around realistic exposure scenarios.

922

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934

935 **Supporting Information Available**

936 Supporting Information includes a description of the process and methods used to develop
937 this critical review, one supporting table, and one supporting figure.

938 **References**

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Table 1: Summary recommendations regarding exposure conditions used in assessing ENM hazard potentials for model organisms
Develop logically conceived, plausible exposure and receptor scenarios in designing experiments, addressing background chemical, physical, and biotic conditions, biological endpoints, and exposure periods.
Thoroughly characterize exposure media, including natural soils, waters, and sediments, and provide metadata to allow cross-comparisons and for mining influential factors across studies.
Select ENM forms—including ENM mixtures or other co-contaminants—and scale exposure concentrations to logically well-defined exposure scenarios, or to scenario-independent mechanistic and process-based modeling goals, or to best available analytical instrumentation limitations.
To the fullest extent possible, characterize ENMs under the exposure conditions and over the time frame of hazard assessments to allow homogeneous exposure or understanding bioavailability and relating endpoint measures to effective forms.
Examine and choose multiple endpoints for ENM physicochemical characterization, toxicity quantification, and toxicant characterization, subject to the exposure scenario or similar context.
Quantify body burden and determine compartmentalization of ENMs and transformation products in receptors, to allow comparing effective doses to measured biological responses. Carefully consider body burden assay approaches to avoid artifacts.
Adopt appropriate experimental control treatments for media additives such as dispersants, and for ENM transformation products that are expected during hazard assessment.
Incorporate appropriate rapid screening approaches, as prioritized tiers in an ecological hazard assessment hierarchy (Fig. 1).
Adapt these approaches in response to relevant knowledge generation.

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Table 2: Summary recommendations regarding exposure and design considerations in mesocosm assessment of ENM environmental hazards
Establish mesocosms only to address clearly defined questions and hypotheses, including those motivated by testing results from lower complexity microcosms, and as related to expected exposure scenarios.
Design and operate mesocosms using established authoritative principles, and aim to minimize artifacts.
Follow the recommendations for assessing hazard potentials in using individualized or microcosm experiments (Table 1)
Make experiment and exposure durations sufficiently long to best represent the exposure scenario underpinning the mesocosm design.
Anticipate and address challenges in detecting and quantifying ENMs in complex media and myriad receptors in mesocosms, such that mass balances can be performed, and bioaccumulation and trophic transfer quantified.
Attend to issues of ENMs aging, or otherwise significantly transforming, over the duration of mesocosm operation, and control for, or otherwise assess, specific outcomes related to aged materials.
Consider assessing effects and ENM interactions with co-contaminants, since they are realistic constituents of most compartments into which ENMs are released.
Anticipate, recognize, and plan to assess secondary effects on non-target receptors that contribute to ecological processes in complex systems represented by mesocosms.
Increasingly use sensitive, e.g., omics type, endpoints as they are responsive to questions and hypotheses motivating mesocosm studies.

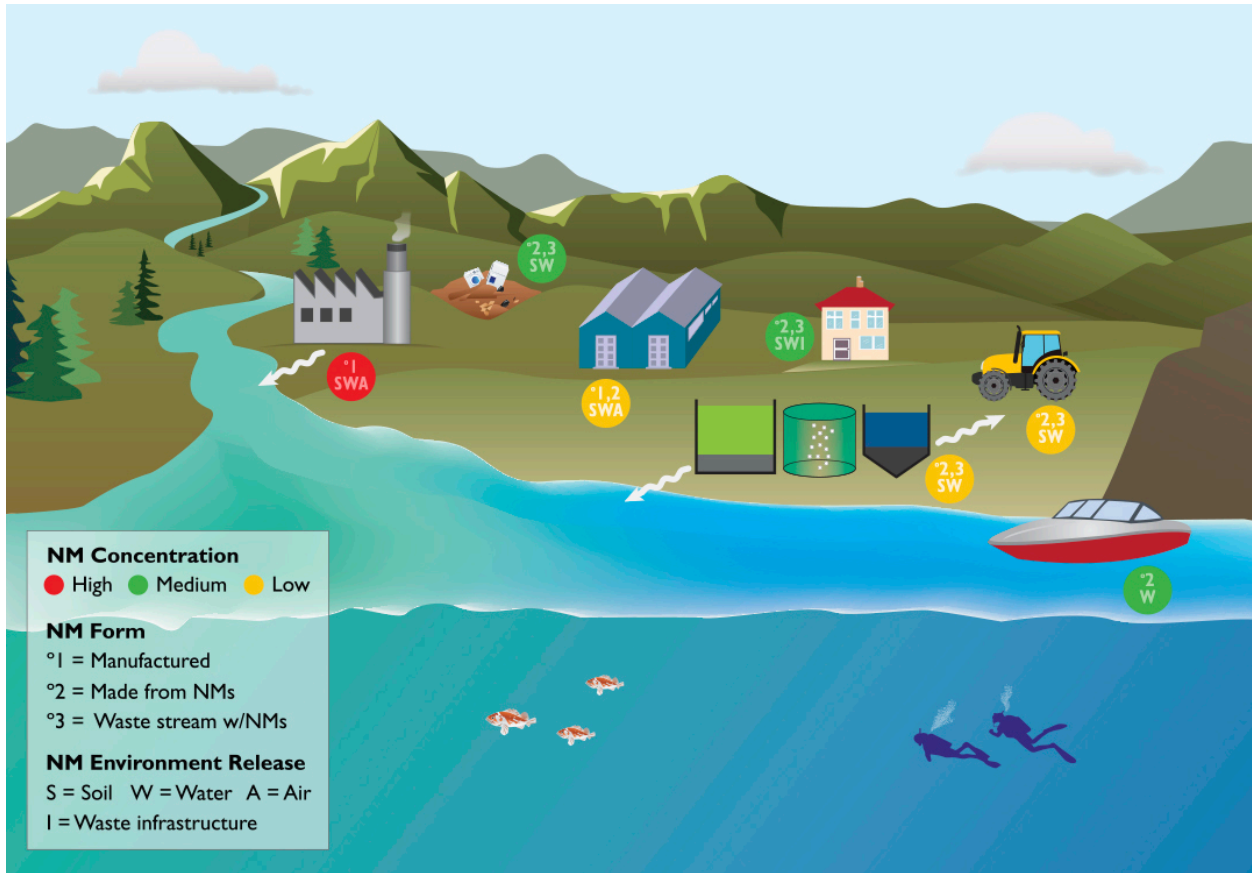
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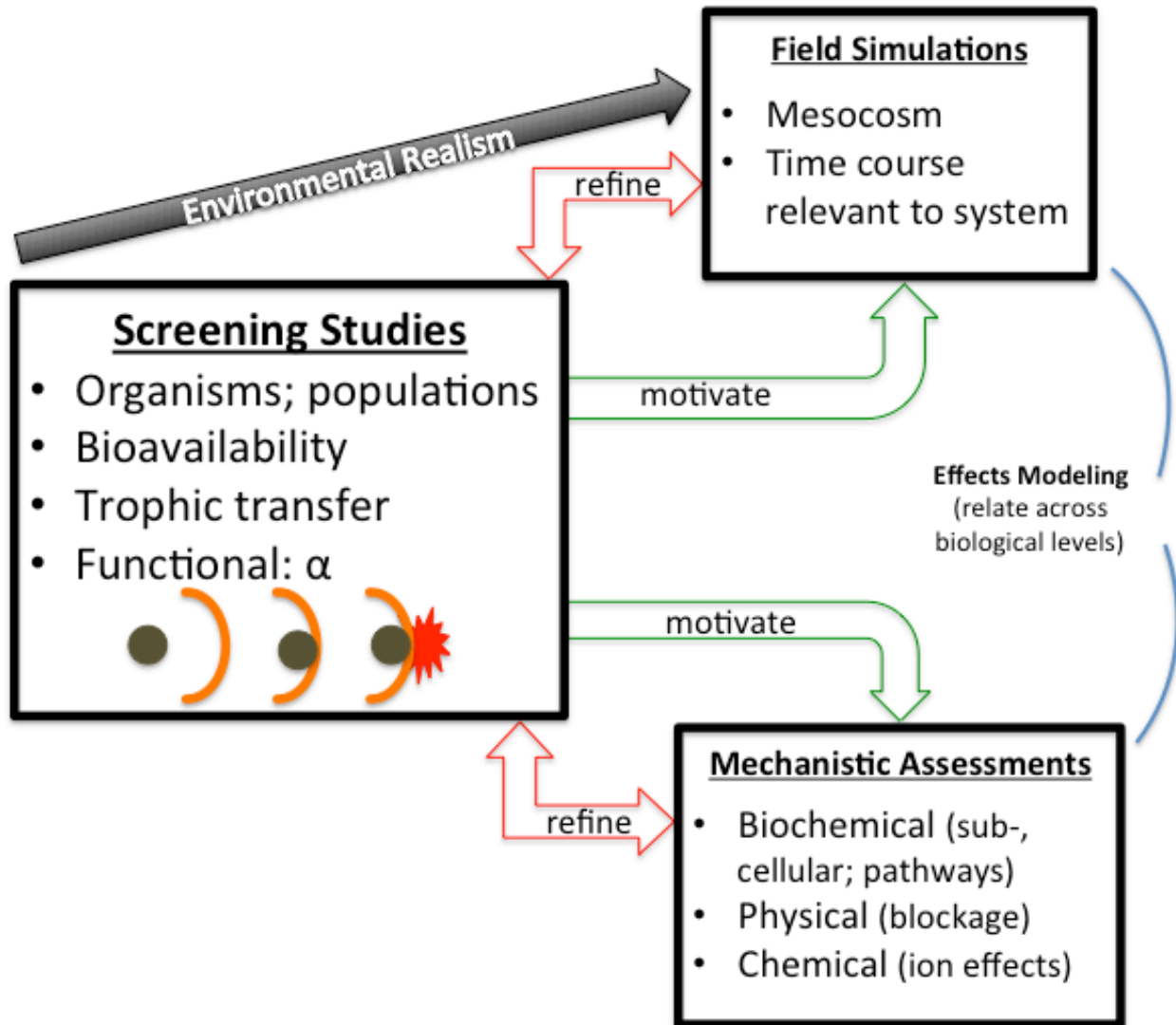
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Figure 1: Conceptual environmental release scenarios for engineered nanomaterials (ENMs) across their life cycles. Potential release sites, clockwise from upper left, include: Primary ENM manufacturing; Landfill with solid waste including nano-enabled electronics, consumer goods, and permitted industrial waste; Secondary processing or goods manufacturing sites using ENMs; Consumer (household) use of ENM-enabled products; Agricultural ENM-enabled product use; Marine or freshwater ENM-enabled product, including coatings, use; Waste treatment with aqueous effluent and solids residuals that may contain ENMs or transformation products thereof. According to the legend, colored circles adjacent to each location indicate the highest expected relative nanomaterial (NM) concentration; the NM forms are as-produced (°1) or in products (°2) or in mixed waste streams (°3); release destinations include waste infrastructure and major environmental compartments (soil, water, air).



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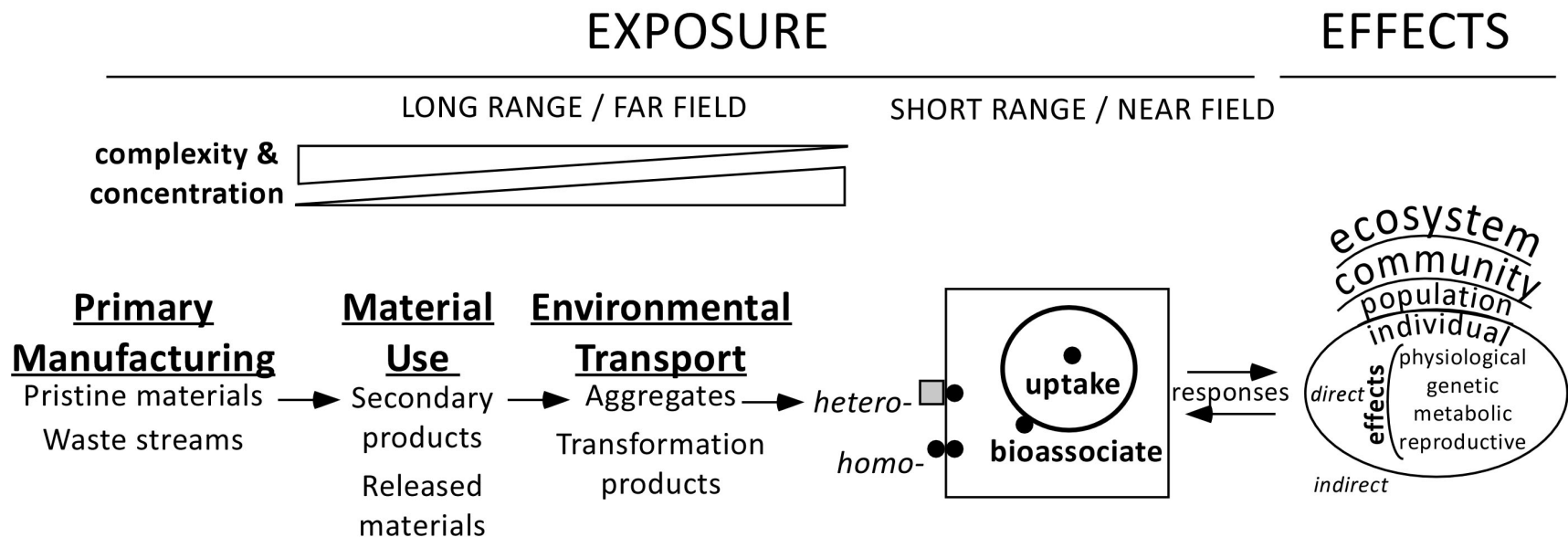
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Figure 2: Interactive “tiers” of ENM ecological hazard assessment. Screening studies (left) are recommended starting points for ENM assessments, and are typically conducted under laboratory conditions, using microcosms, batch reactors, or microplates, depending on the experiment. Examples include assessing organismal to population growth effects, bioavailability (including to communities), ENM physical behavior, and trophic transfer. If screening assay results warrant, mesocosms (upper right box) may be initiated to simulate actual environmental conditions in longer-term experiments, to determine the potential for ENMs to impinge on ecosystems. Screening assay results may also motivate determining mechanisms (lower right box) of observed effects on cells or macromolecules and to characterize biochemical, physical, and chemical interactions of ENMs with biological receptors. Knowledge gained within each tier is used to refine the approaches in the other tiers, thereby improving the relevance of each activity. Results inform development of dynamic process-based mathematical models (curved lines linking across tiers) of biological effects.

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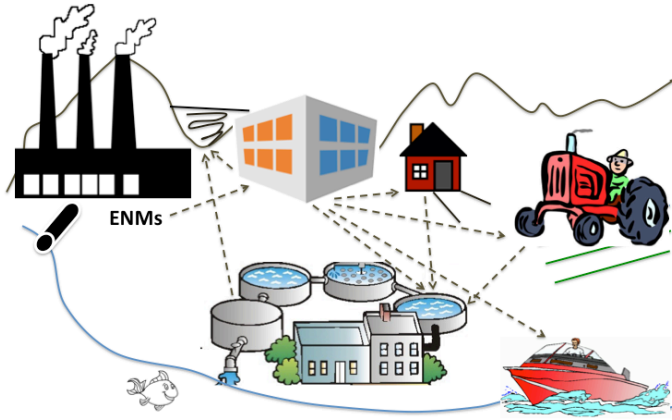
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1980 **Figure 3:** Conceptual exposure and effects assessments in ENM environmental risk assessment. Exposure derives from far-
1981 field emissions, transport, and transformation processes leading to environmental accumulation (bottom “wedge” of ENM
1982 complexity and concentration) of either more complex mixtures, or of specific ENMs or transformation products. Top
1983 “wedges” depict that either ENM complexity or ENM concentration can increase or decrease along the path of far-field ENM
1984 transport. At biological receptors, adverse effects are predicated on near-field exposures. Homo- and heteroaggregation (of
1985 multiple particles, here depicted as two) are particle-specific phenomena that may prevent near-field exposure. Biotic
1986 responses can influence bioavailability, and thus near-field exposures. Direct effects to biota may manifest across all levels of
1987 biological organization (subcellular, to individual, population, community, and ecosystem); effects can also be indirect, e.g.,
1988 from physical effects of ENMs on nutrient availability.

1989 **TOC Art (for Table of Contents Only)**

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