

# 1 Setting the stage for debating the roles of risk assessment and life 2 cycle assessment of engineered nanomaterials

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6 **While technological and environmental benefits are important stimuli for**  
7 **nanotechnology development, these technologies have been contested from an**  
8 **environmental point of view as well. The steady growth of applications of engineered**  
9 **nanomaterials has heated up the debate on quantifying the environmental**  
10 **repercussions. The two main scientific methods to address these environmental**  
11 **repercussions are risk assessment (RA) and life cycle assessment (LCA). The**  
12 **strengths and weaknesses of each of these methods, and the relation between them,**  
13 **have been a topic of debate in the world of traditional chemistry for over two decades.**  
14 **Here we review recent developments in this debate in general and for the emerging**  
15 **field of nanomaterials specifically. We discuss the pros and cons of four schools for**  
16 **combining and integrating RA and LCA and conclude with a plea for action.**

17 Nanotechnology is rapidly evolving and is potentially capable of revolutionising many aspects  
18 of today's world. The world demand for nanomaterials is expected to reach \$5.5 billion by  
19 2016<sup>1</sup>. Manipulating matter at the nanoscale (1-100 nm) has provided a way forward in  
20 designing materials with unprecedented magnetic, electrical, optical, and thermal properties.  
21 In addition, engineered nanomaterials (ENMs) have been produced with the aim of  
22 enhancing people's lives, for instance by applying them in sunscreens, in self-cleaning  
23 facade coatings, and in clothing to reduce the numbers of microbes producing unwanted  
24 odors.

25 Although nanomaterials are perceived to improve environmental quality due to reduced  
26 material needs, human health and environmental safety concerns around nanomaterials  
27 have also been regularly voiced<sup>2</sup>. For example, silver nanoparticles used in socks to prevent  
28 the odors created by bacteria and fungi will sooner or later disappear into the drainage  
29 system through laundering<sup>3</sup>, end up in municipal waste water treatment plants (WWTPs), and  
30 eventually emerge in streams, rivers, lakes, and oceans<sup>4-6</sup>. The resulting human health and  
31 environmental risks of nanosilver release in WWTPs and in the aquatic environment can be  
32 assessed by common risk assessment (RA) methods<sup>7-9</sup>. Another problem is that the  
33 production of silver nanoparticles for socks requires extra energy, e.g. for mining silver<sup>5</sup>,  
34 compared to traditional socks without these particles. On the other hand, it has been argued  
35 that consumers may launder socks with silver nanoparticles less frequently than traditional  
36 socks<sup>10</sup>, thus potentially saving energy and detergents. Such life cycle-related impacts and  
37 trade-offs can be assessed by life cycle assessment (LCA) methods. For all applications of

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38 nanomaterials, the environmental burden caused by nano-applications compared to similar  
39 traditional applications may increase in one part of the life cycle and decrease in another,  
40 and risks may increase or decrease at the same spots. Risks and life cycle-wide impacts  
41 also affect issues such as human health, ecosystem health and climate change, and trade-  
42 offs are commonly needed between these issues. Clearly, the environmental assessment of  
43 ENMs requires scientific, quantitative analyses, incorporating different perspectives, different  
44 environmental issues, and balancing costs and benefits. This gap can be filled by both RA  
45 and LCA, as they are both science-based quantitative analytical tools for policy support.

46 ENMs are regularly claimed to be more environmentally sustainable than traditional  
47 materials<sup>11-13</sup> without any supporting proof from proper research involving methods like RA  
48 and LCA. In addition, the environmental sustainability of ENMs should not just be assessed  
49 after they have entered the market, but rather in as early a stage of development as possible,  
50 to allow the assessment to still guide the technological development of these materials.

51 The relation between RA and LCA has been intensively discussed over the past two decades  
52 for traditional chemicals (e.g. pharmaceuticals, pesticides, metals)<sup>14-16</sup>, as both RA and LCA  
53 can address the environmental consequences of technological solutions to societal issues.  
54 Relevant questions that have been raised many times include the following: should we do  
55 both an RA and an LCA, or is one of them sufficient? Can we integrate RA and LCA into a  
56 unified analysis? If we perform a separate RA and LCA, how should we deal with conflicting  
57 answers? This Perspective outlines the state of the debate on RA and LCA. We identify new  
58 elements of the debate for emerging technology systems, discuss possibilities and limitations  
59 of combining and/or integrating RA and LCA, and sketch the way forward. We use the  
60 application of silver nanoparticles in socks as an illustrating case study throughout the article.

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## 62 **Basics of risk assessment and life cycle assessment**

63 RA has emerged as a scientific discipline and as a basis for regulatory decision-making<sup>17-18</sup>.  
64 RA refers to the quantitative and qualitative evaluation of the risk posed to human health  
65 and/or the environment by the presence of a particular contaminant or of mixtures of  
66 contaminants; see Figure 1<sup>19</sup>. A hazard refers to any potential to cause harm to humans or  
67 the environment<sup>20</sup>. Risk is defined as the probability that exposure to a hazard will lead to  
68 negative consequences for human health or the environment<sup>21</sup>.

69 Exposure can be assessed by measuring environmental concentrations or by modeling the  
70 environmental fate of a contaminant, yielding a Predicted Environmental Concentration  
71 (PEC). Adverse effects are commonly expressed in terms of laboratory-derived dose-  
72 response relationships, which implies that effect assessment is the assessment of the  
73 causality between an organism's exposure to a chemical and its response. Extrapolation of  
74 this causality to hitherto untested species allows a Predicted No Effect Concentration  
75 (PNEC) to be derived. Finally, RA involves assessing the PEC/PNEC ratio and quantifying its  
76 uncertainties. The RA paradigm of risk being proportional to the extent to which PEC/PNEC<sup>22</sup>  
77 values exceed 1 has been extensively validated for soluble chemicals<sup>7,17</sup>.

78 There are no grounds to reject the paradigm for nanomaterials, albeit that it is essential to  
79 properly incorporate the characteristic features of nanomaterials in the RA. In this respect,  
80 the issue of dosimetry is key and a topical research area on how exposure levels should be

81 expressed in terms of numbers of particles or the subsequent derived surface-volume area  
82 instead of on a mass hence concentration base<sup>22-24</sup>. Mode of actions of many nanoparticles  
83 are largely unknown and hence the shape of the dose-response relationships as well. We  
84 acknowledge that the type of a response of a chemical has huge impacts on the low effect  
85 levels (e.g. EC<sub>1</sub> to EC<sub>10</sub>). In LCA often EC<sub>50</sub> levels are used and these derived effect  
86 concentrations are less sensitive to the type of fit used, and are accurate irrespective of a  
87 non-carcinogenic or carcinogenic response. A similar line of reasoning is applicable for  
88 human RA of non-carcinogenic compounds, although with the key difference that PEC and  
89 PNEC are usually modeled in terms of daily intakes (PDI/ADI), with typical pathways of  
90 exposure through breathing, food consumption and drinking water contributing to intake.

91 Risk assessment has a key role to play as the scientific foundation for many national and  
92 international regulatory guidelines, as institutionalized by OECD, US-EPA and others.  
93 Concepts such as sustainability and the precautionary principle have gained increasing  
94 attention, aiming at prospective measures to decrease levels of risk. According to European  
95 regulators<sup>25</sup>, nanomaterials in chemical substances must meet the requirements of the  
96 REACH regulation. To this end, modifications of some of the REACH annexes are  
97 envisaged<sup>26</sup>, partly because the annexes fail to take into account the unique characteristics  
98 of ENMs and partly because of a lack of relevant data<sup>22</sup>.

99 LCA in contrast offers a method for quantitatively compiling and evaluating the inputs,  
100 outputs, and potential environmental impacts of a product system throughout its life cycle<sup>27</sup>.  
101 LCA focuses on a product, technology, or function system, i.e. a system of economic or  
102 industrial processes needed for a product to function. System refers to the entire life cycle of  
103 a product. For example, for an ENM product system it includes the extraction and refining of  
104 all input materials, the production of the ENM itself, the application of the ENM in a specific  
105 product, the use and maintenance of that product, and so on, until the final disposal of the  
106 product at the end of its life, including options for recycling.

107 LCA also aims to include a broad range of impact categories, such as climate change,  
108 acidification, photochemical ozone formation, human toxicity, ecotoxicity, and resource  
109 depletion. There are different ways of defining and calculating these impact categories<sup>28</sup>.  
110 LCA can also map and balance environmental benefits, for instance more emissions or  
111 impact during production but less in the use phase, or more impact on climate change but  
112 less on resource depletion.

113 A broadly accepted set of principles for LCA is based on a series of standards issued by the  
114 International Organization for Standardization (ISO), the 14040 series<sup>27,29</sup>. This includes the  
115 LCA framework (Fig. 2). Examples of hypothetical LCA results are shown in Box 1.

116 LCA is widely applied today. It is used, for example, by companies<sup>30-32</sup>, as well as to support  
117 eco-labeling schemes and environmental product declarations<sup>33-34</sup>, and for public policy  
118 making<sup>35</sup>. It also constitutes the basis of the so-called "carbon footprint" to support  
119 performance-based regulations<sup>36-37</sup>.

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123 **The fundamental constraint**

124 The debate on the relationships between RA and LCA has been going on now for over two  
125 decades<sup>38-42</sup>. The main topics discussed include how RA expertise and models can be used  
126 within the framework of LCA<sup>43-47</sup>, how to include metal-specific models<sup>48</sup>, metabolites<sup>49</sup>,  
127 spatial differentiation<sup>50-54</sup> and multi-substance impacts<sup>55</sup>, and how to define and develop new  
128 approaches for pollutants is not yet covered<sup>56-57</sup>. As part of this discussion, the compatibility  
129 of RA and LCA has been intensively discussed<sup>14-16,58-60</sup>. It has been argued that it is  
130 fundamentally impossible to perform an RA within the framework of LCA.

131 We refer back to our case study on the application of silver nanoparticles in socks. Consider  
132 a world with a region of interest 'C' and a rest-of-world 'R'. There are two products in this  
133 world, socks and TVs. We concentrate on region C, and observe that the population wears  
134 socks and watches TV, both of which are imported from R. Both socks and TVs contain  
135 nanosilver. Some of the activities (industrial processes and consumer activities) emit CO<sub>2</sub>  
136 (blue arrows) while other activities emit nanosilver particles (orange arrows; Fig. 3, panel a).  
137 The main differences between RA and LCA are their starting point of analysis and time (see  
138 Box 2).

139 The present example is simplified, as the process of 'washing socks' belongs entirely to the  
140 life cycle of socks, whereas the process of 'using TVs' certainly does not. The process of  
141 'generating electricity' works partly for the socks and partly for the TVs. If this process had  
142 emitted ENMs, we would have to allocate the emissions partly to the socks and partly to the  
143 TVs.

144 In conclusion, LCA cannot determine the PEC of nanosilver in region C, and as a result it  
145 cannot address risks. Instead, it gives an overall picture of the environmental burden from  
146 socks, due to nanosilver but also due to other pollutants (in this case CO<sub>2</sub>), not only in the  
147 region where the socks are used, but also in the rest of the world. To emphasize the  
148 difference in meaning of "impact" between RA and LCA, impacts in RA have sometimes  
149 been labelled "actual", contrasting with those in LCA, which have been given the name  
150 "potential"<sup>43</sup>.

151 The example also shows that RA and LCA rely on the same sources of data, viz. processes  
152 (industrial and consumer activities) with emissions to the environment (Fig. 3, panel b).

153 Despite the fact that RA and LCA show fundamental differences (see above), RA expertise  
154 can still be usefully applied in LCA (see below).

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156 **Possibilities and limitations of combining and integrating**

157 As discussed above, RA and LCA approach environmental issues from different  
158 perspectives, and they thus provide complementary information<sup>61</sup> and possibly lead to  
159 conflicting conclusions<sup>42</sup>. For instance, an RA with a focus on the laundry process and  
160 nanosilver might conclude that traditional socks are to be preferred over those containing  
161 nanosilver, whereas the LCA might end up with the opposite answer due to impacts related  
162 to the high energy use of the nanosilver production process and less laundry impacts due to  
163 the assumption that nanosilver socks are washed less.

164 Decision making always involves trade-offs, for instance between the economy and the  
 165 environment. The use of complementary approaches implies that trade-offs are also possible  
 166 *within* the environmental domain, namely between the risk perspective and the life cycle  
 167 perspective. In addition, LCA itself already involves trade-offs, not between life cycle impacts  
 168 and risks, but between different chemical emissions (more silver emissions, but less  
 169 phosphate emissions due to less laundering), resource use (more silver ore for nanosilver  
 170 socks but less phosphate rock), or impact categories (e.g., more global warming, less  
 171 ecotoxicity). Since RA and LCA provide complementary information while representing two  
 172 sides of the same coin, it is a relevant question how their results can best be combined, and  
 173 how elements from one can be used in the other. Possibilities and limitations of combining  
 174 and integrating RA and LCA have been explored by several authors over the past two  
 175 decades. The debate on their results can be structured by distinguishing four ‘schools of  
 176 thought’. The four schools, modified on the basis of previous LCA-RA application  
 177 reviews<sup>16,42,60,62-64</sup>, serve to categorize most proposals in the literature; see Table 1.

178 Table 1. Summary of the four schools for combining and integrating LCA and RA.

Schools	Knowledge integration	Chain perspective	RA for LC hotspots	Combining results
RA performed	No	yes	yes	yes
LCA performed	yes	no	sometimes	yes

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 180 The Supplementary Information provides a more systematic overview of the literature on  
 181 combining and integrating LCA and RA.

182  
 183 The first school is what we refer to here as ‘knowledge integration’. Researchers within this  
 184 school adopt specific elements of knowledge from RA into LCA’s impact assessment phase.  
 185 An early example is the approach of USES-LCA<sup>46</sup>, where the USES model<sup>65</sup>, which was  
 186 developed for RA, was adapted to meet the requirements of LCA<sup>43-44</sup>. This idea has been  
 187 further developed by many researchers in various ways (see section “The fundamental  
 188 constraint of LCA compared to RA”). It must be stressed, however, that although using  
 189 elements from an RA model in a different context may be useful in improving LCA, it lacks  
 190 some of the strengths of RA. One example is the ‘relative’ nature of LCA, invalidating one of  
 191 the purposes of RA, viz. that of being able to predict threshold exceedance<sup>66</sup>. Some  
 192 authors<sup>67-69</sup> have tried to resolve this by using RA results (for instance, a PEC/PNEC-ratio as  
 193 an indicator of threshold exceedance) to moderate LCA results. A second example concerns  
 194 absolute versus relative risks. As an RA assesses absolute risks, it can work with safety  
 195 factors to remain on the cautious side. Although this may lead to conservative results, it does  
 196 not introduce bias. In LCA, the RA data are used to trade off risks. The absolute value is not  
 197 important, but the relative value, in relation to other ENMs and to traditional chemicals, is<sup>60,70</sup>.

198 The second school can be referred to as the ‘chain perspective’. We adopt the term chain  
 199 instead of life cycle to indicate that this school looks at a different ‘life cycle’ than the product  
 200 life cycle that is central to LCA. Researchers in this school<sup>65-74</sup> include the life cycle of a  
 201 chemical in an RA. However, the life cycle of a chemical is different from the life cycle of a  
 202 product. The life cycle of a chemical includes all processes of all applications of the studied  
 203 chemical, for example nanosilver, within a certain region; the life cycle of a product

204 containing the studied chemical comprises of all processes (e.g. production, use and  
205 disposal of the nanosilver for socks) as allocated to that product (see Box 2), but also other  
206 processes needed for the functioning of the nanosilver socks, for instance the cultivation of  
207 cotton, production of fertilizers needed for that cultivation, transport of the cotton, etc. The EU  
208 REACH<sup>7</sup> regulation requires that RA is based on an assessment of the 'life cycle' of the  
209 chemical, which then includes its production, use and disposal. While this clearly makes  
210 sense when estimating the emission volume as a part of RA's exposure assessment<sup>65</sup>, it  
211 overlooks parts of the life cycle where different chemicals are released (see Box 2). A clear  
212 example is the electricity production process, which is important in an LCA of nanosilver, but  
213 which is not part of the nanosilver's chain from an RA point of view.

214 The third school, referred to here as 'RA for LC-hotspots', starts from the opposite idea of  
215 including risks in a product life cycle. There are many proposals on this including life cycle  
216 risk assessment and life cycle based RA<sup>68,75-83</sup>. The basic idea is to first perform a full LCA  
217 and then do an RA for the dominant chemicals identified as part of the LCA (LC-hotspots).  
218 This then leads to more accurate impact assessments, as each process can be assessed on  
219 the basis of the local conditions (climate, population density, soil type, etc.)<sup>42</sup>. It could also  
220 yield an absolute assessment<sup>84</sup>, in terms of 'actual impacts' rather than 'potential impacts'<sup>14</sup>.  
221 However, there are still certain fundamental ('different perspectives' and 'real time versus  
222 virtual time') and practical limitations ('allocation') regarding the extent to which risks can be  
223 assessed in a life cycle context; see Box 2.

224 The fourth school, referred to here as 'combining results', aims to combine the results of RA  
225 and LCA, rather than combining or integrating parts of the analytical methods themselves.  
226 The results from LCA and RA can form the input for a procedure for multi-criteria decision-  
227 making (MCDM)<sup>84-89</sup>.

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## 229 **Challenges for engineered nanomaterials**

230 The four schools discussed above apply to traditional chemicals and products as well as  
231 ENMs and their product applications. ENMs are an example of an emerging technology<sup>87</sup>,  
232 which means they are at an experimental stage with lab-scale experimental set-ups, or pilot-  
233 plant scales at best, and therefore create additional challenges to performing RA and  
234 LCA<sup>54,88-89</sup>.

235 Firstly, as emerging technologies often only function at lab- or pilot-scale, data are also only  
236 available at these scales, and not at evidence-based full-market scales. Estimating the latter  
237 requires explorative scenarios of possible full-scale future applications of the technology  
238 studied<sup>5,89-90</sup>. Such scenarios then become the input for an RA and LCA. LCAs performed on  
239 emerging technology systems are often referred to as ex-ante or anticipatory LCAs<sup>91-94</sup>.

240 Secondly, RA has to deal with the challenge of unknown environmental behavior of the  
241 product and unknown effects on humans and the environment of the ENMs themselves<sup>95-96</sup>.  
242 As the LCA impact modeling relies on RA expertise, nanoparticle impacts are often beyond  
243 the scope of present-day LCA studies<sup>88,97</sup>.

244 Thirdly, complex technologies like nanotechnology require a larger supply chain and  
245 infrastructure than traditional technologies, while LCA databases are designed primarily for

246 the latter ones. As an example, the widely-used ecoinvent LCA database<sup>98</sup> contains data  
247 about bulk materials and traditional equipment, such as steel, concrete, and rolling and  
248 crushing equipment, but not about nanomaterials, clean rooms and lithography machines.  
249 The result is that LCA studies on nanomaterials require explicit collection of data not only on  
250 the nanomaterials themselves, but also on the associated equipment. Another high priority is  
251 therefore the development of databases for the entire nanochain, from clean rooms to waste  
252 separation technologies<sup>5,88-89</sup>.

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## 254 **Conclusions and outlook**

255 We have shown that there is a fundamental constraint to combining and integrating RA and  
256 LCA, which hampers their full integration. Combining elements or results of RA and LCA is  
257 nevertheless useful and necessary. We have distinguished four different schools of thought  
258 for combining results of RA and LCA or integrating elements from RA into LCA and vice  
259 versa.

260 We conclude that all four schools represent valuable approaches to combining or integrating  
261 LCA and RA. We also conclude that it is not a matter of choosing between these schools but  
262 rather a matter of pursuing several of them. For example, both ‘knowledge integration’ and  
263 ‘combining results’ are required if we want to include system-wide trade-offs and risks in the  
264 environmental evaluation of ENMs. For the schools identified as ‘chain perspective’ and ‘RA  
265 for LC hotspots’, further clarification is needed as to how they can add to this evaluation, if  
266 they actually address other questions, or if they simply belong to one of the other two  
267 schools.

268 We have argued that the environmental evaluation of ENMs is not just a matter of RA or  
269 LCA, but that both methods are needed for a complete and comprehensive assessment of  
270 possible trade-offs and risks. As the specific use of both methods has been and is still being  
271 debated, clarity and a clear vocabulary are needed to structure the debate<sup>60</sup>, achieve  
272 consensus, and effectively use the two tools while realizing their fundamental incompatibility.  
273 It is for this purpose that we have postulated the above classification into four schools, and  
274 described a number of incompatibilities between RA and LCA in detail. We welcome further  
275 inputs to this debate, and realize that this will definitely not be the final word on this matter.

276 Finally, realizing that all human activities lead to some level of environmental impact and that  
277 the level and seriousness of these impacts should rather be assessed ex-ante than ex-post<sup>99-</sup>  
278 <sup>100</sup>, a specific challenge for ENMs is in combining and/or integrating RA and LCA even when  
279 the ENM systems and their properties are not yet well known. Collaboration between the  
280 fields of RA and LCA is of the utmost importance to effectively address this challenge, and to  
281 use RA and LCA for ex-ante technology assessments and the timely identification or  
282 resolution of environmental issues. The RA and LCA communities should collaborate  
283 intensively on procedures to estimate the unknown data, including proper uncertainty  
284 assessments, defining and developing approaches for modeling of as yet unclear impacts,  
285 co-developing better methods for impacts already covered, and estimating LCA data for the  
286 most crucial processes in the environmental evaluation of ENMs. Alternatively, we could just  
287 wait until all data and models are available. By then, however, most nanomaterials will  
288 already have been fully marketed, implying that all systems have already been designed,  
289 with no way back<sup>101</sup>. The choice is ours.

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517

518 **Competing financial interests**

519 The authors declare no competing financial interests.

520

521 **Figure 1 | The general methodological framework for RA** distinguishing the four main phases of  
522 environmental RA: hazard identification (establishing if there is a risk present), exposure assessment  
523 (predicted environmental concentration (PEC) or daily intake (PDI)), effect assessment (establishing  
524 critical levels of exposure: predicted no effect concentration (PNEC) or acceptable daily intake (ADI)),  
525 and risk characterization (calculating the PEC/PNEC or PDI/ADI quotient). Figure adapted from ref.  
526 19.

527

528 **Figure 2 | The general methodological framework for LCA** distinguishing four main phases: goal  
529 and scope definition (establishing the aim, the functional unit as a basis for the comparison, and the  
530 scope of the intended study), inventory analysis (compiling and quantifying inputs and outputs for a  
531 product), life cycle impact assessment (understanding and evaluating the magnitude and significance  
532 of the potential environmental impacts), and life cycle interpretation (evaluating the findings in order to  
533 reach conclusions and recommendations). The red arrows indicate the result of the inventory analysis  
534 as input for impact assessment or interpretation, the blue arrows the result of the impact assessment.  
535 Figure adapted from ref. 27.

536

537 **Figure 3 | Example illustrating the fundamental differences between RA and LCA** using the  
538 application of silver nanoparticles in socks as a hypothetical case study.

539

### Box 1 | LCA results comparing nanosilver containing socks with traditional socks

Suppose two pairs of socks are compared using LCA, and adopting as the functional unit '1 year of wearing clean socks'. The technical assumptions made for this comparison might include the following:

	traditional socks	nanosilver socks
lifetime of socks (yrs)	1	3
washings per week	3	1
temperature of washing (°C)	40	30
Etc.	...	...

The inventory table, which is the result of the inventory analysis (see red arrow in Fig. 2), might look as follows:

emissions / resource uses	traditional socks	nanosilver socks
CO <sub>2</sub> to air (kg)	25	20
SO <sub>2</sub> to air (kg)	0.4	0.2
Phosphate to water (g)	60	20
Nanosilver particles to water (µg)	0	0.01
Crude oil from earth (kg)	3	4
Silver ore from earth (mg)	0	1
Etc.	...	...

The characterization results, which are the most important results of the impact assessment phase (see blue arrow in Fig. 2), might look as follows (using dichlorobenzene (DCB) as a reference compound for toxicity assessment):

impact categories	traditional socks	nanosilver socks
Climate change (kg CO <sub>2</sub> -eq.)	25	20
Aquatic ecotoxicity (kg DCB-eq.)	10	35
Human toxicity (kg DCB-eq.)	45	43
Aquatic eutrophication (kg PO <sub>4</sub> <sup>3-</sup> -eq.)	5	1
Depletion of fossil fuels (MJ)	3	6
Etc.	...	...

## Box 2 | The fundamental differences between RA and LCA

*Different perspectives:* RA typically focuses on the risk (interpreted as the extent to which the PEC/PNEC ratio exceeds 1; see above) of a specific chemical in a specific region, resulting from its measured or predicted use and release. For instance, it addresses the risks of nanosilver in region C (Fig. 3). Assuming that there is no transboundary pollution of nanosilver, the RA addresses only the emissions from washing socks and using TVs. Supposing that the region's emission of nanosilver from washing 130,000,000 kg of socks/yr is 25 kg/yr, and the region's emission of nanosilver from using 1,450,000 TVs/yr is 15 kg/yr, so a total of 40 kg/yr. This is the result of the emission assessment, and will form the basis of the PEC. It may be used to decide if a critical concentration (PNEC) will be exceeded or not.

The LCA perspective typically starts with a functional unit, say 1 pair of socks, regardless of the number of socks in use. The socks will have a life cycle emission of nanosilver during manufacturing (say 1 mg), during washing (5 mg), and during disposal (2 mg), so a total of 8 mg per pair of socks. This 8 mg cannot be compared with a critical threshold, for several reasons:

- Only real-time (see below) emission flows (in kg/yr), not emission quantities (in kg), will lead to a steady-state concentration (PEC).
- The functional unit of 1 pair of socks is completely arbitrary, and we might just as well have taken 1,000 pairs of socks, or 1 billion pairs of socks.
- The calculated emission of 8 mg is scattered across the region of study and the rest of the world.
- The calculated emission of 8 mg is also distributed over a long period of time (there may be several years between manufacture and disposal of the socks).
- By studying the life cycle of socks, we are overlooking the other source of nanosilver in region C, namely TVs.

*Real time and virtual time:* With respect to the first bullet, note that LCAs are typically performed in terms of 'per unit of product'. If an industrial process emits  $x$  kg/yr and produces  $y$  product units/yr, LCA eliminates the time unit:

$$\frac{\text{emission}}{\text{unit of product}} (\text{kg/unit}) = \frac{\text{emission rate (kg/yr)}}{\text{production rate (unit/yr)}} = \frac{x}{y}$$

RAs, on the other hand, are based on real-time steady-state emission rates ( $y$ ), yielding steady-state concentrations (PEC).

Some of these problems might be overcome by adopting a new LCA paradigm, for instance by taking a functional unit with a flow character (pairs of socks per year; bullet 1), and using the real number (130,000 tons of socks; bullet 2). Indeed, with a functional unit of 130,000,000 kg of socks/yr, some of the limitations will be removed. Starting from the total use of socks in region C per year, the resulting nanosilver emissions may reflect the real-time yearly emission for the washing process. However, this is not the case for the nanosilver emissions due to any upstream or downstream processes, such as the production process, as we are not considering their total process flows but only the quantity needed for producing the nanosilver socks. The total number of socks introduces a time dimension to these upstream processes but this reflects a virtual time rather than real-time. Moreover, by concentrating on a product (socks), all activities that do not relate to socks (such as those relating to TVs) are ignored and we will still do not obtain a proper estimation of the concentration of nanosilver in the region (bullet 5).

