



Presentation of a guide by example, produced by **NanoMesureFrance**, to illustrate the **difficulties encountered in dimensional analysis** by <u>electron and</u> <u>atomic force microscopy</u> of **particles**.

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#### **USE OF NANOMATERIALS: CHALLENGES**



\*https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/contributing-greener-eu-safe-and-sustainable-nanomaterials-design-stage-2021-04-19 en

#### NANOMATERIALS & NANOPARTICLES





łAS	ADOI	TED THIS RECOMMENDATION:			
-	'Nanomaterial' means a natural, incidental or manufactured material consisting of solid particles that are present, either on their own or as identifiable constituent particles in aggregates or agglomerates, and where 50 % or more of these particles in the number-based size distribution fulfil at least one of the following conditions:				
	(a)	one or more external dimensions of the particle are in the size range 1 nm to 100 nm;			
	(b)	the particle has an elongated shape, such as a rod, fibre or tube, where two external dimensions are smaller than 1 nm and the other dimension is larger than 100 nm;			
	(c)	the particle has a plate-like shape, where one external dimension is smaller than 1 nm and the other dimensions are larger than 100 nm.			

In the determination of the particle number-based size distribution, particles with at least two orthogonal external dimensions larger than 100 µm need not be considered.

However, a material with a specific surface area by volume of < 6 m<sup>2</sup>/cm<sup>3</sup> shall not be considered a nanomaterial.

# 2022/C229/01

#### **NANOMATERIALS & NANOPARTICLES**



the best analytical methods?

## **AVAILABLE GUIDES:** FRENCH LEVEL

#### ANSES GUIDE

- FR experts under ANSES coordination
- <u>Comprehensive guide</u> for experts to produce data on key properties expected for REACh
- Partially operational and in need of revision to take account of the new EU recommendation

Revue des meth caracterisation apploments	odes analytiques disponibles pour la des nano-objets, de leurs agrégets et en vue de répondre sux exigences réglementaires
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RAPPORT d'a	ppul scientifique et technique
	Ferries 2020

#### METHODOLOGICAL NOTE SCL

- Expertise of <u>Service Commun des Laboratoires</u> (DGCCRF, DGDDI)
- Electron Microscopy as a <u>reference</u>, supported by screening methods (spICP-MS, DLS...)
- Importance of <u>sample preparation</u> & <u>assessments of laboratory</u> <u>skills</u>

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# AVAILABLE GUIDES: EUROPEAN LEVEL



#### EUROPEAN PROJECTS

- Development of reference or representative testing materials
- Validation of methods (TEM, SEM, AFM, SAXS, PTA, DLS, aerosol...) & test protocols: sample preparation, count number size distribution analysis, analysis rules, inter-laboratory comparison
- Methods applicable to specific nanomaterials & qualified on the basis of samples that are sometimes far from « real life » ones



## JRC GUIDES (**EU LAB**)

- Key terms & concepts related to the European recommendation of definition of nanomaterials
- Recommandations for selecting the most appropriate analytical methods / strategies







https://publications.jrc.ec.europa.eu /repository/handle/JRC132102

# AVAILABLE GUIDES: INTERNATIONAL LEVEL

### OECD TEST GUIDELINES

- Available free of charge on the OECD website
- Documents including preparation protocols and recommended materials for method validation

# **TG N°125**: NANOMATERIAL PARTICLE SIZE AND SIZE DISTRIBUTION OF NANOMATERIALS

- Inter-laboratories comparison on analytical techniques: AFM, CLS, DLS, DMAS, PTA/NTA, SAXS, SEM, TEM
- Electron Microscopy: sample preparation + counting rules



https://www.oecd-ilibrary.org/environment/test-no-125-nanomaterialparticle-size-and-size-distribution-of-nanomaterials\_af5f9bda-en





## **AVAILABLE GUIDES:** *LESSONS LEARNED*

#### ELECTRON MICROSCOPY (EM) AS A « REFERENCE » BUT:

- Number of standards\* or guidelines is too limited & often « theoretical »
- Available FR, EU & INT guides are still <u>at a general level</u> and may lead to interpretations
- Level of applicability of EM to « real-life » nanomaterials is poorly documented

### EM ANALYTICAL PROTOCOLS NEED TO BE **DEVELOPED**, VALIDATED & HARMONISED

#### **NEED OT KNOW** ABOUT:

Difficulties & limitations, of electron microscopy techniques, encountered in the dimensional analysis of « real-life » particulate materials



## NANOMESUREFRANCE: A STRUCTURING RESPONSE



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Pôle internenistinal de prospettive et d'anticipation

clear mutations economics.es



#### ASSOCIATION + NANOMESUREFRANCE +

STATUTS DE L'ASSOCIATION

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Fedération des Entrepties de la Beauté (FEBEA) - 137 rue de l'Université. 19337 Paris

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#### Artain 4 - Composition

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**Financial support from the lle-de-France** region and the French government (09/2021 - 09/2024)





#### NANOMESUREFRANCE: MAIN CHALLENGES



 IDENTIFYING NEEDS & <u>COORDINATING FRENCH EFFORTS</u> IN THE FIELD OF PRE-STANDARDIZATION OF TEST METHODS

DEFINE PRIORITIES AND BUILD COLLECTIVE ROADMAP & SOLUTIONS



#### NANOMESUREFRANCE: OUR MEMBERS IN 2025



# NANOMESUREFRANCE: ADVISORY BOARD

- **Communicating on the actions** carried out by NanoMesureFrance
- Express the views, expectations and recommendations of key external bodies
- To shed light on **regulatory issues**
- Provide information on initiatives undertaken by other national, european or international bodies



## NANOMESUREFRANCE : NMs IDENTIFICATION

#### 1. SHARE GOOD PRACTICES WITH ALL MEMBERS

- Inter-working groups meetings
- NanoMesureFrance Website / events (technical days "Cosmetics", "Identification", "REACh" or workshops "Nanomedecine")

# **2. ASSESS THE APPLICABILITY** OF THE RECOMMENDED METHODS

- <u>Subjectivity</u> of particles counting rules
- <u>Limitations of electron microscopy</u> inherent in the physchem specificities of "real-life" particulate materials

#### **3. IDENTIFY ANALYTICAL SOLUTIONS AND THE MEANS TO IMPLEMENT THEM** IN RESPONSE TO DIFFICULTIES AND LIMITATIONS





### SHARE GOOD PRACTICES: JRC GUIDANCE



### SHARE GOOD PRACTICES: WHICH OBJECTS?





Aggregate

Constituent particles linked together by strong forces





change, especially in agglomerates. This is the main reason why the EC NM definition is based on the external dimensions of the constituent particles, which is a more stable feature, even if the constituent particles may sometimes be difficult to measure. Therefore, while the implementation of the EC NM definition does not require distinguishing between aggregates and agglomerates, the difference between aggregates and agglomerates can influence the selection of suitable measurement methods.

- <u>Screening techniques</u> CANNOT <u>directly</u> <u>measure the size of constituent particles</u> of aggregates and agglomerates.
- ELECTRON MICROSCOPY is one of the techniques <u>capable of producing</u> the data needed to measure the size of the constituent particles, whether or not they are isolated.

## SHARE GOOD PRACTICES: COUNTING RULES

#### PARTICLES COUNTING RULES FOR ELECTRON MICROSCOPY

- Simple case: isolated particles
- <u>Complex cases</u>: aggregates and agglomerates with **identifiable** constituent particles

#### INHERENT SUBJECTIVITY

- Identification of <u>constituent particles</u> by operators
- The choice of laboratories with regard to the expected resolution of EM images used to identify constituent particles

a) Particles present on their own





# ASSESS THE APPLICABILITY: METHODOLOGY ADOPTED

Considering the <u>confirmation</u> <u>methods</u> (**EM & AFM**) and <u>recommended analysis rules (JRC & OECD guides)</u>



FEEDBACK from NanoMesureFrance members on materials for which they are <u>unable to establish the number size distribution</u> and to conclude on <u>« nanomaterial » status</u>

Identify **specific features** & **group** materials <u>into</u> <u>complexity classes</u>

Identify the **limitations** of <u>SEM, TEM & AFM</u> techniques

Propose <u>first analytical</u> <u>solutions</u>

NanoMesureFrance guide outlining the limitations of SEM, TEM & AFM techniques for characterising the size of some commonly encountered particulate materials

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## GUIDE BY EXAMPLE: DIFFERENT LEVELS OF READING

**Documents available in** 

French and English

#### Full version (~ 50 pages with tables & appendices)







**Summarised version** 

- 1. Supporting analytical experts when implementing microscopy techniques
- 2. Assisting stakeholders in the process of identification of
  - « *Nanomaterials* » in a regulatory framework

- 1. Sharing key information with **non-experts** in order <u>to</u> <u>anticipate possible identification difficulties</u>
- 2. Inform the **regulatory authorities** so that <u>they are aware</u> of the problems encountered

# GUIDE BY EXAMPLE: OVERVIEW

#### **IDENTIFICATION OF NANOMATERIALS:**

 Difficulties encountered during the dimensional analysis of particles by electron and atomic force microscopy: Guide by example, complexity classes and initial considerations

#### A COLLECTIVE WORK:

- 15 co-authors, members of NanoMesureFrance
- Co-authors' profiles: analytical experts, regulatory experts, non-experts stakeholders
- Sectors: multi-sectoral, including → manufacturers and users of nanomaterials / instrument manufacturers / service providers





# GUIDE BY EXAMPLE: OVERVIEW

#### **OBJECTIVES**:

- To define complexity classes useful for establishing complementary decision trees
- To highlight the **difficulties associated with using** <u>electron/atomic force microscopy</u> for these classes
- Illustrate these difficulties with "real-life" examples
- Take stock of the technologies available
- Introduce possible technological solutions and areas of development to be prioritised



This guide focuses on the <u>difficulties encountered</u> when using <u>microscopy</u> <u>techniques</u> to characterize the size of particulate materials

It does not cover the problems associated with the <u>extraction phase from</u> <u>finished products</u> of these materials



This guide is not intended to provide detailed solutions for the <u>analysis</u> <u>conditions</u> to be implemented

### GUIDE BY EXAMPLE: FEEDBACK



<u>STEP 2</u>: Group these materials into complexity classes: families of materials with similar physico-chemical properties or specificities













#### GUIDE BY EXAMPLE: SIMILARITIES



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#### GUIDE BY EXAMPLE: COMPLEXITY CLASSES





#### High size polydispersity







#### GUIDE BY EXAMPLE: FEEDBACK





















MALL REPORT March 1997 Barch 1997















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#### GUIDE BY EXAMPLE: SIMILARITIES













































#### GUIDE BY EXAMPLE: COMPLEXITY CLASSES





#### GUIDE BY EXAMPLE: FEEDBACK























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#### GUIDE BY EXAMPLE: SIMILARITIES











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#### GUIDE BY EXAMPLE: COMPLEXITY CLASSES



#### High size polydispersity



#### Platelet-type







#### Aggregates















#### GUIDE BY EXAMPLE: FEEDBACK











MALL REPORT March 1997 Barch 1997





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#### GUIDE BY EXAMPLE: SIMILARITIES



















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#### GUIDE BY EXAMPLE: COMPLEXITY CLASSES







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#### GUIDE BY EXAMPLE: FEEDBACK

















#### GUIDE BY EXAMPLE: SIMILARITIES



















#### GUIDE BY EXAMPLE: COMPLEXITY CLASSES



#### GUIDE BY EXAMPLE: SIMILIARITIES









#### **GUIDE BY EXAMPLE:** COMPLEXITY CLASSES



### GUIDE BY EXAMPLE: COMPLEXITY CLASSES

This list **is not intended to cover all the difficulties encountered** <u>when using EM or</u> <u>AFM techniques</u> to characterise the size of particulate materials

These 6 classes **reflect the state**, **at the end of 2024**, **of the main concerns** (based on their feedback) of <u>NanoMesureFrance members</u>

The elements of the guide will evolve to include <u>new solutions</u> or <u>future classes of</u> <u>complexity</u>





# **GUIDE BY EXAMPLE: STRUCTURE**

- Summary and introduction of complexity class
- Issues (limitations of EM/AFM techniques) to analyse the complexity class)
- Most « illustratives » SEM/TEM/AFM images
- State of the art of existing technologies able to respond to these difficulties
- Recommendations and development areas

Full guide: 4 pages per complexity class Summarised version: 1 page per complexity class



Table 1: Illustration of the difficulties associated with class "A. Materials exhibiting high size polydispersity



#### OVERVIEW OF EXISTING TECHNOLOGIES

- · SEM is the method best suited to producing images highlighting all the particles and identifying the presence of agglomerates that group together small and large particles;
- · TEM, subject to prior deagglomeration of the particles constituting the sample, has a resolution and magnification covering wide size ranges;
- The manufacturers of electron microscopes offer software to automate the process of obtaining images. This automation makes it possible to generate large number of images while reducing operator time (and therefore the costs of analysis);
- Related to this automation, functionalities for assembling microscopy images ("image stitching") are offered on new generation equipment, making it possible to merge data obtained for different magnifications and cover a wide range of sizes;
- · Automated recognition software based on artificial intelligence (AI) and machine learning is also being developed.

#### RECOMMENDATIONS AND DEVELOPMENT AREAS TO CONSIDER

- · First of all, it is necessary to define this complexity class based on a measurand allowing a characterisation of "high size polydispersity";
- After defining this complexity class, efforts must focus on determining the minimum number of particles to analyse to ensure representative data. The number of particles to be analysed must be set based on the standard deviation of the size distribution and estimated uncertainty, using the recommendations of the ISO 19749:2021 and NF EN ISO 21363 standards. For instance, in the case of samples showing relatively low polydispersity (geometric standard deviation below 1.5), and following its

"Difficulties encountered during the dimensional analysis of particles by electron and atomic force microscopy: Guide by example complexity classes, and initial considerations" - version December 11, 2024



# GUIDE BY EXAMPLE: HIGH SIZE POLYDISPERSITY

### **DEFINITION**:

 A "<u>material exhibiting high size polydispersity</u>" is a material composed of particles with a size distribution featuring several distinct peaks (or modes) or covers a continuous wide range spanning several orders of magnitude (ranging from 1 nm to 100 µm)

#### **ISSUES**:

- Obtaining a sufficient number of electron microscopy images with suitable resolution to determine particle size over such a wide range of sizes (1 nm to 100 µm)
- Sample preparation: inhomogeneity of deposit in terms of size and <u>« sticking » of smaller particles to larger ones</u>







# GUIDE BY EXAMPLE: HIGH SIZE POLYDISPERSITY



#### AVAILABLE TECHNOLOGIES:

- Screening methods <u>not adapted</u>
- **SEM & TEM** (after de-agglomeration) are <u>able to cover wide</u> <u>size ranges</u>
- Automation of image <u>acquisition</u> (stitching) and <u>analysis</u> (Machine Learning) under development

#### **DEVELOPMENT AREAS:**

- Define a measurand to characterize « high size polydispersity »
- Counting statistics 
   how many constituent particles should be considered to ensure that the analysis of the material is representative?
- Validation of preparation and analysis methods on representative testing materials
- Evaluation of <u>fragmentation</u> (A4F) or <u>separation</u> (micro and ultrafiltration) methods prior to EM analysis





Figure 4: Illustration of the need to increase the number of particles to be counted depending on the size polydispersity of the material. Left: a sample of slightly polydispersed silica (300 particles counted), middle: a sample of silica with greater polydispersity (700 particles counted), right: a mixture of latex beads of 60, 100, and 220 nm (more than 2700 particles counted)



# GUIDE BY EXAMPLE: PLATELET-TYPE

#### **DEFINITION**:

 A nanoplate is a nano-object that has a thickness of less than 100 nm and lateral dimensions that can exceed 100 nm. Therefore, the smallest dimension to measure is the thickness

#### **ISSUES**:

- Sample preparation: ensure that platelets are properly dispersed to limit stacking
- To have a technique for <u>unambiguously identifying</u> particles with a <u>platelet-like shape</u>







# GUIDE BY EXAMPLE: PLATELET-TYPE

#### AVAILABLE TECHNOLOGIES:

- Screening methods not adapted
- SEM & TEM give 2D projections → techniques limited by the deposition of platelets on the substrate substrat
- In theory, only AFM can robustly determine the thickness of a platelet, but it is also sensitive to sample preparation

#### DEVELOPMENT AREAS:

- Validation of preparation and deposition methods
- Definition of a harmonised protocol for embedding platelets/nanoplates in a resin to enable thickness analysis
- Explore other methods: EELS coupled with electron microscopy, nanotomography, etc.
- Inter-comparison of methods: representative materials



Figure 5: on the left an SEM image of particles constituting a material based on boron nitride, in the middle an AFM image of a particle of this material with the red line delineating the axis used to determine the height profile shown on the right (mean height: 18.65 nm)



Figure 6: Illustration of the potential of the "resin embedding + ultramicrotomy" process for analysing the thickness of platelet-shaped clay particles. Left: TEM image of untreated clay particles, middle: TEM image of a cross-section prepared by ultramicrotomy of clay in platelet form embedded in a polymer. Right: enlarged view of a specific section of particles that have been cut perpendicular to the plane of the particles for thickness analysis



# GUIDE BY EXAMPLE: MIXTURES OF MATERIALS

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#### **DEFINITION:**

 Mixtures of several materials which do not interact strongly with each other:

(i) Having different elemental chemical compositions <u>exhibiting different particle</u> <u>shapes or not</u>

(ii) Having the same elemental chemical compositions, but <u>exhibiting different</u> particle shapes

(iii) Having the same elemental chemical compositions and the same shape, but exhibiting different chemical formulae

#### **ISSUES**:

- Ability of currently available analytical tools to access shape, chemical and/or crystallographic information on a particle-by-particle basis in order to be able to establish number size distributions for each material contained in the mixture.
- Complex sample preparation: selectivity if size differences are significant, choice of solvent so as not to modify the different materials



#### Mixture of $TiO_2$ and organic material -

The two different morphologies of the materials are not clearly distinguishable, and only EDX elemental analysis (bottom), subject to adequate resolution, can reveal the location of the two constituents.



# GUIDE BY EXAMPLE: MIXTURES OF MATERIALS

#### AVAILABLE TECHNOLOGIES:

- Morphological discrimination possible on the basis of <u>SEM & TEM images</u>
- EM + detectors (WDS, EDS, EBSD, TKD): mixtures of different elemental compositions or crystalline forms
- Nano-positioning or correlative imaging systems

#### **DEVELOPMENT AREAS:**

- Analysis strategy: morphological and/or correlative approaches in line with ECHA and JRC guidelines
- Sample preparation: anticipating the specific characteristics of the different materials making up the mixture
- Development of correlative metrology approaches: the challenge of having representative test materials to compare & validate methods



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Illustration of the capacities of the KD (transmission Kikuchi diffraction) technique **to identify different iron oxides** (Crouzier, Feltin & Jablon, Meas. Sci. Tech. 2024)







# GUIDE BY EXAMPLE: AGGREGATES

#### **DEFINITION**:

 Nano-objects can be found in aggregated/agglomerated form <u>following synthesis</u>

### **ISSUES**:

- Subjectivity of the analyst in identifying the constituent particles
- Distinction between aggregated particles and polycrystalline material
- Consideration of constituent particles at the heart of aggregates





**Precipitated calcium carbonate** - mineral material that should not be interpreted as aggregates of particles but as polycrystalline particles made up of smaller grains



# GUIDE BY EXAMPLE: AGGREGATES

#### AVAILABLE TECHNOLOGIES:

- Screening methods <u>not adapted</u>
- **SEM & TEM** (after de-agglomeration) are <u>able to</u> <u>image constituent particles</u>
- Automated analysis software based on <u>IA</u> (Machine Learning) developed and qualified
- HR-TEM to demonstrate polycrystalline nature

#### **DEVELOPMENT AREAS:**

- Harmonisation of counting techniques in cases where particle identification is highly dependent on the analyst's subjectivity
- Development of tools to complete the 'missing fraction' (fraction of a particle's surface that may be masked by other particles)





Titanium dioxide - Illustration of the degree of resolution required for the images (the images here are made using HR-TEM high resolution transmission electron microscopy) in order to describe the bonds between the constituent particles and thus define the concepts of aggregate or agglomerate on a theoretical level (Albers et al., 2015<sup>14</sup>)



Figure 8: Illustration of the process of "completing" the missing fraction of a particle using a tool based on artificial intelligence and deep learning (adapted from Coquelin et al., 2019<sup>16)</sup>



# **GUIDE BY EXAMPLE:** *LESSONS LEARNED*

#### NANOMESUREFRANCE AS A TRUSTED FRAMEWORK:

- ~ 50 materials for which <u>electron microscopy and atomic force microscopy methods do</u> <u>not</u> (or with difficulty) allow conclusions to be drawn about their <u>"nanomaterial" status</u>
- Introduction of complexity classes to identify the <u>limitations</u>, and their origins, of the <u>analytical techniques and protocols available</u> to date
- Identification of areas for development and possible analytical solutions
   SHARING THIS KNOWLEDGE BEYOND NANOMESUREFRANCE
- Enabling <u>as many stakeholders as possible</u> to **anticipate analytical difficulties**
- Testing and improving recommanded methods
- Build common solutions in response to <u>stakeholders' expectations</u>



### GUIDE BY EXAMPLE: AVAILABILITY

#### SOON AVAILABLE ON OUR WEBSITE



#### www.nanomesurefrance.fr



### GUIDE BY EXAMPLE: PROSPECTS

#### **BUILDING COMMON SOLUTIONS**

 Webinars, events & projects organised by NanoMesureFrance (member-only workshop in June 2025, inter-laboratory comparison on SEM image analysis)

#### USE OF THE GUIDE BY ALL STAKEHOLDERS TO IDENTIFY PRIORITY COMPLEXITY CLASSES





https://www.nanomesurefrance.fr/

contact@nanomesurefrance.fr

Thank you for your attention



in <u>https://www.linkedin.com/company/association-nanomesurefrance</u>

# GUIDE BY EXAMPLE: COMPOSITE MATERIALS

#### **DEFINITION:**

- This complexity class brings together materials composed of a substrate, sometimes on a micrometre scale, onto which a coating is bonded by strong interactions to achieve <u>specific</u> properties (optical properties, affinity for certain matrices)
- The chemical compositions of the <u>substrate and coating</u> may be similar or totally different

#### **ISSUES**:

- Not in the measurements themselves, but in the <u>interpretation of</u> the data produced
- Producing data to demonstrate their composite nature



 $TiO_2$  particles coated with  $SiO_2$ 

2022 Recommendation of the European Commission for the definition of a nanomaterial (2022/C229/01)

The definition should not cover large solid products or components, even when they have an internal structure or a surface structure at the nanoscale, such as coatings, certain ceramic materials and complex nanocomponents, including nanoporous and nanocomposite materials. Some of these products or components may have been manufactured by using nanomaterials and may even still contain them.



# GUIDE BY EXAMPLE: COMPOSITE MATERIALS

#### AVAILABLE TECHNOLOGIES:

- Screening methods not adapted
- SEM appears to be suitable, as its <u>combination with</u> <u>specific detectors</u> (EDX, EBSD) enables an elemental and structural analysis of the coating/substrate pair with resolutions appropriate to their respective scales

#### DEVELOPMENT AREA:

 Methodological approach under discussion within NanoMesureFrance





# GUIDE BY EXAMPLE: RESTRICTED STABILITY

### **DEFINITION:**

- This complexity class brings together two cases:
  - Materials whose **chemical properties** can cause a <u>change</u> in their **size and/or** shape under the electron beam of SEM, TEM, and STEM microscopes;
  - Materials whose **mechanical properties** can cause them to deform, thereby altering their size and shape under the AFM tip.

### **ISSUES**:

- Lack of methods for anticipating possible changes in the size and/or shape of the particles being tested
- Sample preparation: metallisation of samples, choice of susbtrates, etc...



Gold particles melting under the beam of an SEM (temporal evolution from left to right and from top to bottom)

Schematic illustration of the **deformation of** a particle under an AFM tip









# GUIDE BY EXAMPLE: RESTRICTED STABILITY

#### AVAILABLE TECHNOLOGIES:

#### Electron Microscopy:

Charge compensation devices: « *low vaccum* » Cooling system to limit samples' degradation Low acceleration voltages while maintaining resolution (nm)

• **AFM:** complementary modes for assessing mechanical properties

#### **DEVELOPMENT AREAS:**

- Develop and harmonise analytical strategies
- Preliminary analyses (TGA BET) to identify the presence of a thermally unstable phase
- Hybrid approaches (SEM-TEM/AFM) to confirm (or refute) degradation/deformation
- Cryo-EM or environmental electron microscopy





