



June 24, 2020

Dan Sieger, Chair  
TURA Administrative Council  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

David Williams, Chair  
TURA Science Advisory Board  
Bureau of Environmental Health / Community Sanitation Program  
250 Washington Street, 7th floor  
Boston, MA 02108

Dear Undersecretary Sieger and Chair Williams:

With the attached petition, Clean Water Action/Clean Water Fund, the City of Cambridge, and Public Employees for Environmental Responsibility ask the Toxics Use Reduction Act Administrative Council to list carbon nanotubes and nanofibers as a hazardous substance and to lower the reporting threshold to 100 grams.

The nanomaterial sector in Massachusetts is booming. Carbon nanotubes and nanofibers are used in a wide variety of applications. Several of the world's largest producers of CNTs and CNFs are located in the Bay State.

Unfortunately, an abundant body of evidence links CNTs and CNFs to pulmonary toxicity and cancer and raises concerns about other systemic effects and genotoxicity. As a first step towards insuring the safety of workers and the public, the Commonwealth should have basic information about where and how carbon nanotubes and nanofibers are being manufactured and used.

Massachusetts has tried to gather data through a voluntary survey, with limited results. Municipalities such as Cambridge have similarly been unable to obtain information on nanomaterials being developed within city boundaries.

Thank you for considering the attached request to list carbon nanotubes and carbon nanofibers as a hazardous substance under TURA.

Sincerely,

Elizabeth Saunders  
Massachusetts Director

Laura Spark  
Climate & Health Advocate