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CHAPTER

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July 29, 2013

Chairman John D. Keenan
Joint Committee on Public Health
State House, Boston, MA 02133

Chairman Jeffrey Sanchez
Joint Committee on Public Health
State House, Boston, MA 02133

Re: H. 2086 An Act to require environmentally safe alternatives to harmful cleaning products

For additional information, please see *Nonylphenol Ethoxylates: A Safer Alternative Exists to This Toxic Cleaning Agent*, Sierra Club. <http://j.mp/1aKsSTK>

Dear Chairman Keenan, Chairman Sanchez, and Honorable Members of the Committee,

Thank you for providing the opportunity to offer comments on H.2086, "An Act to require environmentally safe alternatives to harmful cleaning products." The Sierra Club wishes to express our support for passing effective legislation that would result in the elimination of toxins in our environment by promoting safer alternatives.

The Sierra Club is the oldest and largest non-profit, non-partisan environmental organization in the country. With over a forty year history in this chapter, the Massachusetts Sierra Club represents about 22,000 members throughout the state and over 1 million members and supporters nationwide. We fight for clean air, clean water, the preservation of the Commonwealth's most precious natural spaces, and healthy, vibrant communities.

There is a growing body of evidence that the chemicals used in our everyday lives can have enormous unintended health consequences. Many chemicals once thought of as benign or acceptable in small quantities have been entirely removed from the manufacturing process. Additionally, while some products are tested in isolation, their combination with others can either greatly magnify their effect, or in some cases, provide entirely different effects.

There is a common misconception that state and federal agencies have programs, already in place, that are monitoring the exposure safety of the 84,000 chemicals that are currently being sold or used in manufacturing.¹ However, prior approval of new chemicals is not done by any federal nor state agency. In reality, only a few hundred have undergone complete testing.

Enacting this important legislation would also help combat the growing problem of multiple chemical sensitivity (MCS), which is a chronic medical condition that is a result of low-level chemical exposure. Commonly accused substances can include household and industrial cleaners, fragrances added to cleaning products, solvents, pesticides, plastics, synthetic fabrics, air fresheners and other scented products, petroleum products, and paint fumes.

Symptoms are often non-specific, such as nausea, fatigue, dizziness and headaches, but also commonly include inflammation of skin, joints, gastrointestinal tract and airways. Manufacturers of cleaning products, unlike food or even personal care products (i.e. shampoo), further compound this problem by not listing the ingredients contained in their products. There is a desperate need for this knowledge because many people who are suffering from chemical reactions do not know how irritants are ending up in the air they breathe, or in surface and drinking waters.

The Sierra Club recognizes the great threat presented by environmentally hazardous substances. These are substances, dispersed through human activity, which (a) persist in the environment, become widespread and/or tend to become concentrated in living organisms, and, by their effect on health, reproductive ability or genetic material, or by their effect on environmental processes, present a danger to living organisms including human beings, other than those which are the direct and immediate target of their application, or (b) combine, act synergistically, or break down in the environment to create substances that meet the above criteria.

The use or release of any environmentally hazardous substance should be prohibited, unless the environmental benefits clearly outweigh any potential environmental damage. Safety and environmental quality are the primary factors in deciding whether or not to use such a substance. In each case, strict limits to the use of the substance should be established and followed. New or continued application of any material that is suspected to be environmentally hazardous should be stopped immediately pending further investigation.

The Sierra Club supports this proposed legislation, as it creates a clear path to the decrease and eventual elimination of these hazardous chemicals, and we respectfully request that this committee report this bill favorably. Furthermore, we hope that H. 2086 receives the full support by all members of the Senate and House of Representatives.

Respectfully,

A handwritten signature in black ink that reads "Ryan Black". The signature is written in a cursive, flowing style.

Ryan Black
Director
Massachusetts Sierra Club

¹ Everyday chemicals may be harming kids, panel told, CNN Health, October 2010.
<http://www.cnn.com/2010/HEALTH/10/26/senate.toxic.america.hearing/index.html>