State Must Regulate Nurdles That Wreak Havoc on Coastal Ecosystems
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The Problem
- Texas waters are polluted with pre-production plastics, which include “nurdles.” The Clean Water Act grants the Texas Commission on Environmental Quality (TCEQ) authority to regulate pre-production plastic pollution. In 2022, TCEQ proposed a change to its Surface Water Quality Standards to prohibit discharge of these pollutants, but withdrew the proposal due to unjustified concern about its authority.
- The Sunset Advisory Commission has criticized TCEQ for being a “reluctant regulator” that lacks public trust.
- Nurdles are toxic and also attract other harmful pollutants that can stick to and build up on their surface and then leach into the environment.
- Risks include degraded water quality, threatened native wildlife that eat the nurdles, and contaminated soil, as well as potential human health harms to the digestive, endocrine, and nervous systems.

Potential Solutions
- The Legislature should explicitly instruct TCEQ to consider the effect of primary plastic pollution on the ecosystem through the Surface Water Quality Standards.
- The Legislature should direct TCEQ to establish rules for zero-discharge of pre-production plastic as well as provide cleanup and remediation mechanisms.

Constituent Support
- More than 500 Sierra Club members submitted comments to the TCEQ last year, urging them to ban pre-production plastic pollution.
- Rural Texans have sued industry for over-polluting the state’s waters with nurdles.
- Constituent momentum against nurdle pollution is growing. Citizen scientists on Mustang and North Padre islands founded a local Nurdle Patrol group in 2018 to track nurdles and educate the public about their hazards. Other Texans have gone on a “Great Gulf Nurdle Expedition” and filmed a documentary about their findings.

OVER
Related Bills

- **HB 4144 (Zwiener):** This bill amends the water code by requiring that TCEQ assess pre-production plastic pollution and consider such pollution in the development of Surface Water Quality Standards. It also provides a clear definition for pre-production plastic pollution. TCEQ already has discretionary authority to consider such impacts, but this bill simply requires TCEQ to evaluate, monitor, and consider pre-production plastic pollution. Sierra Club strongly supports this bill.

- **HB 4957 (Zwiener):** This bill adds a section to the water code that requires TCEQ to adopt and implement, by rule, a program that ensures a no-discharge standard of pre-production plastic into Texas waters. Sierra Club strongly supports this bill.