

1 Environmental impacts by fragments released from
2 nano-enabled products: A multi-assay, multi-
3 material exploration by “the SUN approach”.

4 *Monica J.B. Amorim, Sijie Lin, Karsten Schlich, José M. Navas, Andrea Brunelli, Nicole*
5 *Neubauer, Klaus Vilsmeier, Anna L. Costa, Andreas Gondikas, Tian Xia, Liliana Galbis, Elena*
6 *Badetti, Antonio Marcomini, Danail Hristozov, Frank von der Kammer, Kerstin Hund-Rinke,*
7 *Janeck J. Scott-Fordsmand, André Nel, Wendel Wohlleben**

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9 AUTHOR ADDRESS

10 Mónica J.B. Amorim, University of Aveiro, Department of Biology and CESAM, 3810-193
11 Aveiro, Portugal (mjamorim@ua.pt)

12 Sijie Lin, College of Environmental Science and Engineering, State Key Laboratory of Pollution
13 Control and Resource Reuse, Tongji University, Shanghai 200092, China; Center for
14 Environmental Implications of Nanotechnology, California NanoSystems Institute, University
15 of California Los Angeles, CA 90095, United States States (lin.sijie@tongji.edu.cn)

16 Karsten Schlich, Kerstin Hund-Rinke, Fraunhofer Institute for Molecular Biology and Applied
17 Ecology, Dept. Ecotoxicology, Auf dem Aberg 1, 57392 Schmallenberg, Germany.
18 (Kerstin.Hund-Rinke@ime.fraunhofer.de)

19 José M Navas, Liliana Galbis. INIA, Dept. of Environment, Ctra. De la Coruña Km 7.5 E-28040
20 Madrid

21 Andrea Brunelli, Elena Badetti, Antonio Marcomini, Danail Hristozov, Dept. of Environmental
22 Sciences, Informatics and Statistics (DAIS), University Ca' Foscari of Venice, Via Torino 155,
23 30170 Venice Mestre, Italy (andrea.brunelli@unive.it), (elena.badetti@unive.it),
24 (marcom@unive.it), (danail.hristozov@unive.it)

25 Nicole Neubauer, Klaus Vilsmeier, Wendel Wohlleben, Dept. Material Physics, BASF SE, 67056
26 Ludwigshafen, Germany. (wendel.wohlleben@basf.com)

27 Anna L Costa, ISTECCNR, Via Granarolo, 64, I-48018, Faenza, Italy (anna.costa@istec.cnr.it)

28 Andreas Gondikas, Frank von der Kammer, Dept. of Environmental Geosciences, University of
29 Vienna, 1090 Vienna, Austria (frank.von.der.kammer@univie.ac.at)

30 Andreas Gondikas, current address: Dept. of Marine Sciences, University of Gothenburg, 412-96
31 Gothenburg, Sweden (andreas.gondikas@gu.se)

32 Janeck J. Scott-Fordsmand, Aarhus University, Dept Bioscience, Vejlsovej 25, PO Box 314, 8600
33 Silkeborg, Denmark (jsf@bios.au.dk)

34 Tian Xia, André Nel, Division of NanoMedicine, Department of Medicine, Center for
35 Environmental Implications of Nanotechnology, California NanoSystems Institute, University
36 of California Los Angeles, CA 90095, United States (txia@ucla.edu; anel@mednet.ucla.edu)

37 Wendel Wohlleben, Dept. Experimental Toxicology and Ecology, BASF SE, 67056 Ludwigshafen
38

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40 effects; pigments; carbon nanotubes; polyolefin; cement; epoxy

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42 ABSTRACT

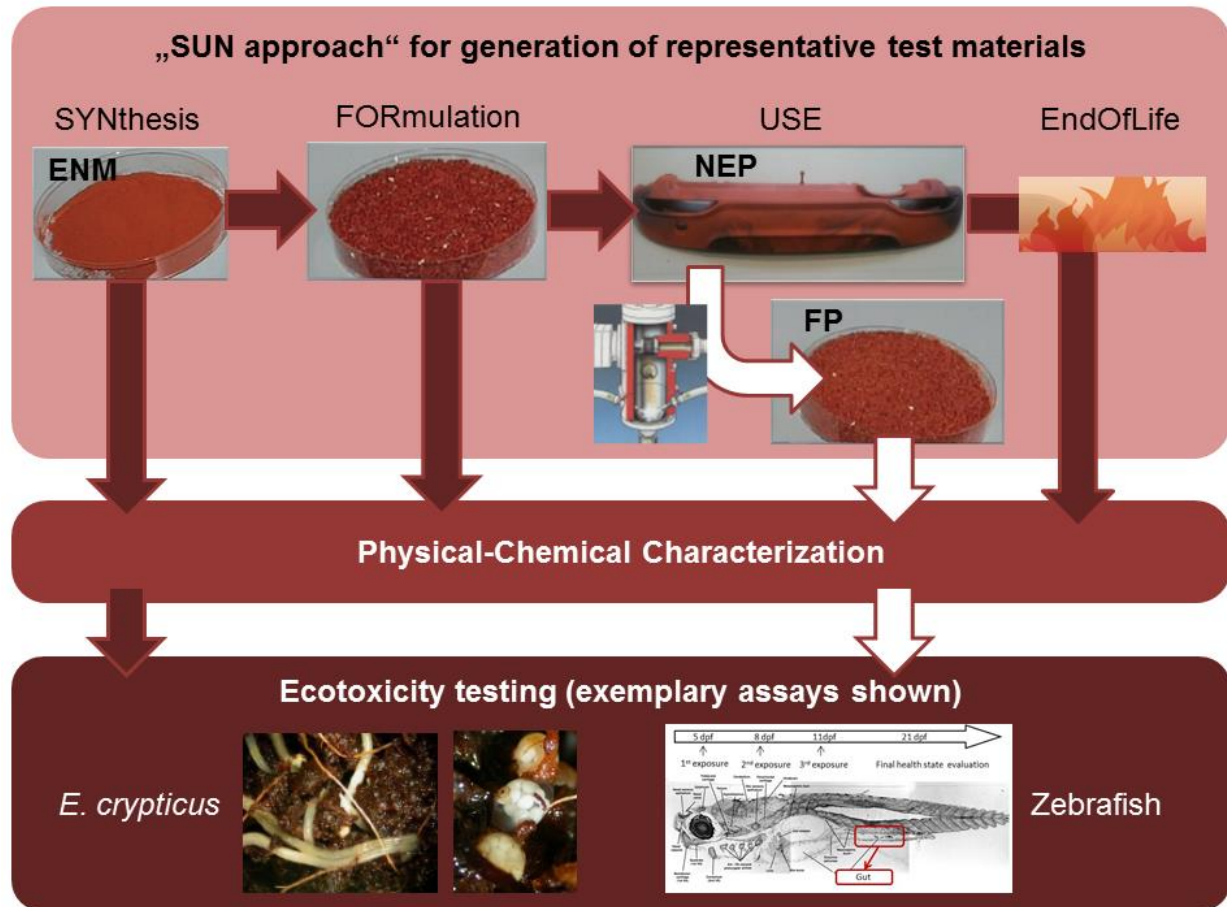
43 Nano-enabled products (NEPs) have numerous outdoor uses in construction, transportation or
44 consumer scenarios, and there is evidence that their fragments are released in the environment at
45 low rates. We hypothesized that the lower surface availability of NEPs fragment reduced their
46 environmental effects with respect to pristine nanomaterials. This hypothesis was explored by
47 testing fragments generated by intentional micronisation (“the SUN approach”, Nowack et al,
48 ES&T **50** (2016) 2747). The NEPs were composed of four matrices (epoxy, polyolefin,
49 polyoxymethylene, cement) with up to 5% content of three nanomaterials (carbon nanotubes, iron
50 oxide, organic pigment). Regardless the type of nanomaterial and/or matrix used, it was observed
51 that nanomaterials were only partially exposed at the NEP fragment surface, indicating that mostly
52 the intrinsic and extrinsic properties of the matrix drove the NEP fragment toxicity.
53 Ecotoxicity in multiple assays was done covering relevant media from terrestrial to aquatic,
54 including sewage treatment plant (biological activity), soil worms (*Enchytraeus crypticus*), and
55 fish (zebrafish embryo and larvae, trout cell lines). We designed the studies to explore the possible
56 modulation of ecotoxicity by nanomaterial additives in plastics/polymer/cement, finding none. The
57 results support NEPs grouping by the *matrix* material regarding ecotoxicological effect during the
58 use phase. Further, control results on nanomaterial-free polymer fragments representing
59 microplastic had no significant adverse effects up to the highest concentration tested.

60 **Introduction**

61 Nanocomposites are a dominant class of nano-enabled products (NEPs), and especially those with
62 a “durable” matrix, such as rubber, cements, plastics and coatings, are often in outdoor use.^{1, 2}
63 Processes such as wear, tear, manufacturing and shredding (mechanical processes) and photolysis,
64 hydrolysis, aggressive use environments, thermal decomposition (chemical processes) contribute
65 to the degradation of nanocomposites^{3, 4} and induce releases into the environment at various time
66 scales along the lifecycle.^{5, 6} Pristine Engineered Nanomaterials (ENM) can induce adverse effects
67 on environmental species in aquatic, sediment and soil compartments.⁷ This is relevant for
68 emission scenarios such as spills during the ENM synthesis phase of the lifecycle, but not for the
69 NEP use phase. For NEPs made of chemically resilient nanocomposite materials, the only relevant
70 case for NEP outdoor use, nanocomposite fragments of the NEPs are the dominant physical-
71 chemical form of environmental releases during the use phase.⁸⁻¹⁰ However, to the best of our
72 knowledge no study has ever reported on environmental effects by NEP fragments. This is a
73 serious gap in environmental risk assessment of nanomaterials. NEP fragments differ from pristine
74 ENM in key physical-chemical properties such as composition, size, surface chemistry.¹¹ Their
75 environmental release rates on the order of g/year¹² are too low to measure their properties and
76 environmental effects directly for degrading NEPs, which in a controlled experiment requires
77 exposure of various organisms up to high doses. To meet the gap, Nowack et al. proposed “the
78 SUN approach”: NEPs were micronized to generate fragmented products (FP) in kg quantities for
79 characterization of properties and effects.¹³ Our hypothesis for this study, based on limited reports
80 on mammalian studies, is that FP will have lower environmental impacts compared to pristine
81 ENMs due to the lower surface availability of ENM contained in FPs.

82 Here we deliver an exploration of ecological effects of multiple NEP-FPs by multiple ecotoxicity
83 assays, supported by an extensive physical-chemical characterization of the properties of the FPs
84 generated by “the SUN approach” (**Figure 1**). Specifically, we compare different ENM in the same
85 matrix, and additionally explore one ENM in different matrices. We selected a balanced choice of
86 NEPs: this includes highly studied nanomaterials, of which we chose a family of NEPs with
87 multiple walled carbon nanotubes (CNTs) in polyolefins for conductive functionality / in cement
88 for electromagnetic shielding functionality / in epoxy for lightweight functionality in automotive
89 / construction / airplane applications, respectively.¹⁴ Additionally, we selected a family of NEP
90 made from less well studied ENM from commercially well-established particulate materials,
91 which are now identified as nanomaterials in regulatory terms, specifically transparent halogen-
92 organic and inorganic pigments for automotive parts and coatings.² These constitute the large
93 volume reports in the French nanomaterial registry with above 100 ton/y nanoform production or
94 import in France, far above CNT.¹⁵ Due to the history of widespread use of nanoforms of these
95 materials in coating, ink, plastic components of consumer products, a historical and ongoing
96 dispersive emission of NEP fragments into the environment has to be anticipated. We previously
97 verified that the ENMs are present in and on the FPs, and that even after extensive (365 MJ/m²)
98 UV radiation less than 6 ppb of the ENM content migrates or leaches from the weathered FPs
99 (WFPS),¹⁶ such that testing of environmental effects can be approximated by testing FP only. This
100 reasoning is specific to environmentally persistent matrices such as polyolefins or cements, as
101 tested here. Our study is the first to enable their environmental risk assessment with full
102 consideration of the nanostructures induced by the ENM content.

103



104
 105 **Figure 1.** How can we assess environmental impacts from nano-enabled products?
 106 Representative test materials across all lifecycle phases are needed: The pristine ENM powder
 107 (here an organic pigment), represents spills during nanomaterial synthesis (SYN), and the pigment-
 108 in-polymer masterbatch granules represent spills during formulation (FOR). But the nano-enabled
 109 product (NEP), a 1.4m-wide car bumper in one of our case studies, releases fragments only at very
 110 slow rates.¹² Specifically to the “SUN approach”, highlighted by white arrows, mechanical
 111 micronisation generates fragmented products (FP) to represent the real-world NEP releases with
 112 greatly increased surface and surface-accessible ENM.¹³ Photographs illustrate test materials in 10
 113 cm petri dishes (no ashes remain after incineration in the specific case). Materials representing all
 114 lifecycle phases were compared regarding their physical-chemical properties. The most relevant

115 materials were compared regarding their ecotoxicity by multiple assays, of which the lower panels
116 show: Enchytraeidss (soil): *Enchytraeus crypticus*. in culture soil and a detail of the cocoons with
117 eggs inside, and the Zebrafish (aquatic): *Danio rerio* development assay using water-
118 accommodated fractions. We assessed six NEPs and their ENM-free control matrices in a
119 systematic variation of ENMs and of matrices (see Figure 3).

120

121 **Materials and Methods**

122 *ENM, synthesis phase and NEP, formulation phase:* The test panel consisted of three ENM and
123 four matrices. The same nanomaterials have been used previously for extensive human toxicity
124 testing.^{17, 18} “CNT” designates multi-wall CNT, CAS 308068-56-6, and is the identical grade as
125 the batch distributed as NM400 in the OECD sponsorship program. “OrgPig” designates di-keto-
126 pyrrolo-pyrrole, CAS 84632-65-5. “Fe₂O₃” designates hematite, CAS 1309-37-1 (**Table SI_1**).
127 All ENM were formulated into polyolefins (high density polyethylene, HDPE, and polypropylene,
128 PP). Additionally to PP, the CNT was integrated in three complementary matrices:
129 Polyoxymethylene (“POM”) nanocomposite identical to the FP used in a human tox study¹⁹,
130 cement (“cement”) nanocomposite identical to the FP used in a human tox study¹⁹, epoxy
131 (“epoxy”) nanocomposite identical to those applied in the NanoRelease interlab testing (**Table**
132 **SI_2**).²⁰ Comparative testing of environmental weathering releases was performed on the identical
133 nanocomposites, finding release rates that increase across five orders of magnitude in the order
134 polyolefin – POM – epoxy – cement.²¹

135 *NEP fragmentation, use phase:* We implemented “the SUN approach” (**Figure 1**) and performed
136 cryo-milling for all NEPs as listed in **Table SI_2**. In short, the OrgPig_PP, Fe₂O₃_PE,

137 CNT_epoxy, CNT_PP nanocomposite materials and the PP, PE, epoxy nano-free controls were
138 frozen to cryogenic temperatures (at -193°C, liquid N₂) in order to maximize brittleness.¹³
139 Additionally, in order to remain comparable to earlier human tox investigations on sanding dusts,
140 limited tests were performed on CNT_POM and CNT_cement fragments and their POM, cement
141 control fragments. These were generated by sanding (1.8 m/s, grit 80, 10 N) of the same NEP batch
142 that was previously investigated by rat in vivo studies.¹⁹ See SI for fragmentation details.

143 *FP size analysis:* Size distributions have been previously reported.¹³ and are included by the
144 median diameters here. In short, FP were dispersed in a concentration of 1 g/l by sonication in
145 water containing 0.5 g/l SDS (Sodiumdodecylsulfate), and were characterized by laser diffraction
146 (Malvern Mastersizer 3000).

147 *FP composition analysis:* The content of ENM in several FP was not known previously, and was
148 investigated here by ICP-MS for the inorganic ENM and by combustion for the organic pigment.
149 In the case of CNT, the detection was based on the content of Al and Co in the used CNT which
150 remains from their production process. The Al and Co content is known from earlier release
151 investigations on the same batch of CNT_epoxy.²⁰

152 *FP surface chemistry analysis (X-ray photoelectron spectroscopy, XPS + hydrophobicity):*
153 Surface composition was investigated by XPS to determine element concentrations and content of
154 ENM at the fragments' surface. Phi XPS 5500 with 300 W monochromatic Al-K alpha radiation,
155 pass energy for surveys 117 eV. The XPS penetration depth of 10 nm is around three orders of
156 magnitude smaller than the FP diameters. Identical analysis was performed on pristine ENM. To
157 evaluate the hydrophobicity, contact angle measurements were performed by placing a sessile drop

158 of water onto a round pressed plate of ENM or FP respectively with a diameter of 3 cm. Triplicates
159 had standard deviations between 2° and 6°.

160 *FP “biologically accessible” fraction of ENM:* Biologically accessible ENM are defined as those
161 that are in contact to the surrounding liquids, and are considered as the fraction that can potentially
162 elicit an ENM-specific effect. FP were dispersed in 1% HCl and shaken for up to 22h. At each
163 sampling, the suspension was left to settle for 10 minutes, then sampling an aliquot for ICP-MS to
164 determine Al, Co, and Fe concentrations. The HCl concentration chosen is enough to keep traces
165 of these elements in a truly dissolved state, while it is not expected to significantly corrode the
166 organic matrix. The method was adapted from Schlagenhauf et al.²²

167 *FP “dispersability” in liquid media:* FP were dispersed by testing both bath sonication (30 min,
168 power 35W) and probe sonication (15 min, power 100W) into different media, specifically:
169 distilled water (DW) + sodium dodecyl sulfate (SDS) at 20 mM; DW + Suwannee River Humic
170 acid (SRHA) at 0.2% w/w; Artificial freshwater (AFW, adhered to OECD 203 protocol²³) + SRHA
171 at 0.2% w/w. As expected from polyolefin density, flotation of FPs on the water surface was
172 observed. The results were confirmed within the concentrations range from 10 mg/l to 10 g/l by
173 means of Dynamic Light Scattering (DLS, multi-angle Nicomp ZLS Z3000 Particle Sizing
174 System), Centrifugal Separation Analysis (CSA, LUMiSizer 651, L.U.M. GmbH) and number-
175 based Transient Resistive Pulse Sensing (TRPS, izon qnano).

176 ***Ecotoxicological testing of fragmented material***

177 Testing aimed to cover from aquatic to terrestrial exposure, using a suite of standard organisms
178 and associated endpoints as these are among the current mandatory framework. As shown in Figure
179 1, each phase of the lifecycle may result in environmental emission by spills during SYN and FOR,
180 or by slow micronisation and degradation during USE or finally by landfilling of remaining solids

181 after incineration (polymers) or after destruction (cements), impacting sewage treatment plants,
182 soils and other compartments.

183 *Sewage sludge treatment plant function*

184 Effects on the biological function of a sewage treatment plant (STP) were investigated based on
185 the OECD Test Guideline 303A (OECD, 2001). A lab-scale STP (behrotest® Laborkläranlage
186 KLD 4N, Germany) with a denitrification and nitrification reactor and a secondary clarifier was
187 used. The pristine Fe₂O₃ and the fragmented Fe₂O₃_PE were added continuously over 10 days with
188 the synthetic sewage into the denitrification reactor of the model STP. Effects on the biological
189 function of the STP were assessed by measurements of the elimination rate of dissolved organic
190 carbon and the determination of nitrate, nitrite and ammonia in the effluent of the sewage treatment
191 plant, representing the denitrification and nitrification processes. Treatments included from 0.04
192 mg/L (environmental relevant) to 1.0 mg/L (worst case scenario).

193 *Microbial function - Short and long-term effects on the soil microflora*

194 The nitrite content was determined using the short-term potential ammonium oxidation test as
195 recommended by ISO Guideline 15685 (2012). The effect on ammonia oxidizing bacteria was
196 determined 24 h and 28 days after application of the nanomaterials (10 and 1000 mg/kg dry matter
197 soil) into reference soil.

198 *Long term effects via sewage sludge spread into agricultural soil*

199 After 10 days continuous addition of the nanomaterial into the STP, the sludge was dewatered and
200 added to the reference soil in accordance with the German sewage sludge ordinance, which states
201 5 tons per hectare over 3 years can be spread on agricultural areas. 1.67 g of dry matter sludge
202 were introduced into the soil, under the assumption of a soil depth of 20 cm and soil density of 1.5
203 g/m³, corresponding to test concentrations of 0.4 and 10 mg/kg dry matter soil. The soil was

204 incubated at 20°C in an incubation chamber in the dark. The long term effect of the nanomaterials
205 added via sewage sludge on the ammonia oxidizing bacteria was investigated after 30, 60, 100 and
206 140 days of incubation.

207 *Enchytraeid Reproduction Test (ERT):*

208 Cultures of test species *E. crypticus* (Oligochaeta: Enchytraeidae, **Figure 1**) were kept in agar
209 plates for several years.²⁴ The standard LUFA 2.2 natural soil (Speyer, Germany) was used.
210 Spiking followed the recommendations for nanomaterials^{25,26} The standard guideline (ISO 2004;
211 OECD 2004) was followed, but instead of using adults, 10 synchronized age (17-18 days)
212 organisms were used. Exposure concentrations ranged from 0-3200 mg/kg soil dry weight for both
213 the ENM and the FP, i.e. for the FP exposure there was a corresponding lower % of ENM. Test
214 ran at 20 °C and 16:8h photoperiod during a period of 28 days. Endpoints assessed included
215 survival (number of adults) and reproduction (number of juveniles).

216 *Hatching, survival and growth test on zebrafish embryos and larvae*

217 Zebrafish embryos and larvae were used to assess the hazard potential in a model organism
218 frequently used in nanomaterial safety studies (**Figure 1**). Motivated by FP hydrophobicity and
219 lack of dispersability, sample preparation for aquatic compartment testing (see details in SI)
220 targeted the water-accommodated fraction as recommended by an OECD workshop.²⁷ Healthy
221 embryos at the same developmental stage (2 hour post fertilization, hpf) were selected and placed
222 in 96-well plates with one embryo per well.^{28,29} One hundred microliters of CNT, or FP of CNT-
223 cement and CNT-POM was added to the wells at 4 hpf. To achieve robust statistical calculation,
224 five replicate trials were carried out, each using 12 embryos. Observations of adverse biological
225 outcomes, including hatching interference, phenotypic abnormalities and mortality (necrosis of the
226 embryos), were carried out every 24 h for five consecutive days.

227 Using our previously developed pulse exposure procedure,³⁰ we further investigated the hazard
228 potential of the CNT and FP from CNT-nanocomposite in zebrafish larvae. As shown in **Figure**
229 **SI_5**, the pulse exposure was conducted using groups of 30 growth-synchronized larvae at 5, 8
230 and 11 days post fertilization (dpf). The exposure was performed in Petri dishes for 6 h each time
231 by immersing the larvae in 3 mL of the suspension of CNT or FP. The larvae were maintained in
232 standard aquarium tanks for further observation of development and survival until 21 dpf. The
233 overall health status of the larvae was assessed at 14 dpf based on gross morphology, body length
234 and weight, and number of calcified vertebrae. To assess morphology, larvae were anesthetized in
235 0.02% tricaine and embedded in low-melt agarose gel. This allowed positioning to obtain lateral
236 views to assess morphology, body length, and fin structure.

237 *Cytotoxicity on fish cell lines*

238 Two fish derived cell lines were used: RTL-W1³¹ and CLC.^{32, 33} For details see SI. Cells were
239 exposed for 24 h to appropriate concentrations of the original NM or of the FP (0.78 to 100 µg/mL)
240 using 96 well plates. Two independent experiments were carried out, with treatments applied in
241 triplicate in each experiment, Fresh suspensions were prepared for each experiment in milliQ water
242 at 10 mg/ml by sonication for 20 min in an ice-water bath using a probe sonicator (Vibra cell
243 VCX130, Sonics & Materials Inc., Newtown, CT, USA) (2 mm microtip, 80% of amplitude
244 continuous mode). 75 µl were then mixed with 25 µl of bovine serum albumin (BSA, 80 mg/l)
245 solution, added to 7.4 ml of culture medium, and sonicated for 10 min in a bath sonicator (S 40 H
246 Elmasonic, Elma, Germany). Cells were exposed to ½ serial dilutions of this suspension in culture
247 medium. Cytotoxicity was measured by three different assays.^{34, 35}

248

249 **Results & Discussion**

250 Enabled by the “SUN approach” (**Figure 1**), we followed nanomaterials along their lifecycle, both
251 by physical-chemical and by ecological methods. The pristine ENM, representing the SYN (as
252 SYNthesized) phase, and the fragmented product, representing releases during the USE (in USE)
253 phase, were characterized in terms of size, composition, and surface properties (**Figure 2** and
254 **Table SI_3**). Additionally, selected properties were available from our previous publications or
255 from gap-filling original data for the FOR (FORmulation) and EOL (End Of Life) phases. **Figure**
256 **3** thus constitutes a “lifelog” of nanomaterials from cradle to grave.

257 Our specific understanding of lifecycle phases differentiates:

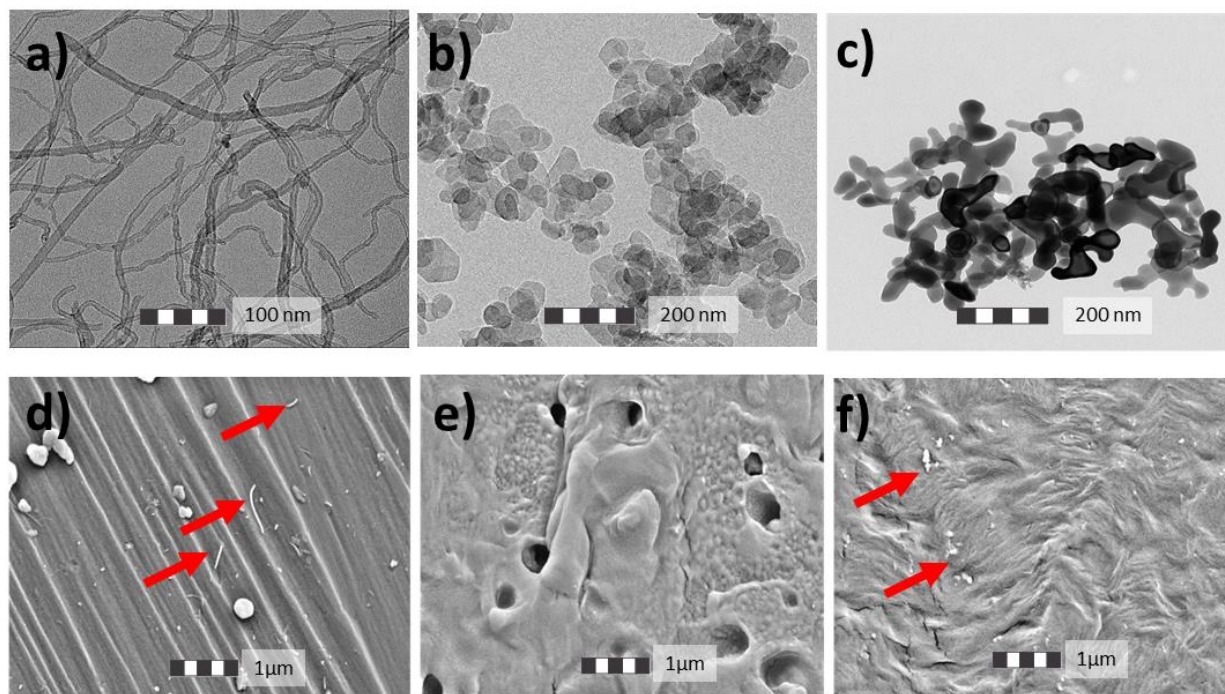
- 258 • SYN = synthesis of the pristine ENM, typically as powder. Industrial process by chemical
259 operations. Risk assessment prioritizes occupational human aerosol exposure and
260 environmental emissions by spills and waste streams.
- 261 • FOR = formulation of the ENM as an additive in a product matrix. Industrial manufacturing
262 process that produces a nano-enabled product (NEP). Our case studies used ENM
263 masterbatch (for thermoplastic polymers PP, PE, POM), or ENM suspensions in liquid
264 precursors (epoxy polymer and cement).
- 265 • USE = consumer use of the NEP. Risk assessment needs to consider various product-
266 specific scenarios with durations between days and decades. For our specific case studies,
267 environmental emissions of FP by weathering, wear and tear during outdoor use take
268 priority.

- 269 • EOL = end of life of the NEP by recycling or disposal by incineration or landfill. For our
270 specific case studies Table 3 reports the results measured for incineration of epoxy³⁶ and
271 PP^{37, 38} or landfill of cement FP.

272 Previously we reported the FP size as a basic descriptor.¹³ Here we go further to characterize the
273 composition and surface chemistry by several descriptors that are most relevant for nanoscale- or
274 micro-particles. The actual ENM content in FP (USE phase) was found to be minimally above the
275 ENM content of the FOR phase, resulting in a small kink in the “nanomaterial lifelog” between
276 FOR and USE phase (**Figure 3**, panel “composition”). The increase in ENM content correlates
277 roughly with the brittleness of the matrix, as it is least with PP and PE, higher with epoxy and
278 cement. Transmission Electron Microscopy (TEM) scans of iron oxide pigments extracted from
279 Fe₂O₃_PE fragments showed no significant change of nanomaterial structure due to the
280 fragmentation process (ultramicrotomy data not shown). As the changes of composition are
281 minimal between FOR phase and USE phase (**Figure 3** and **Table SI_3**), whereas only the USE
282 phase potentially releases fragmented product by diffuse emissions into the environment, we
283 focused testing on the SYN and USE phases. Sizes after sieving were above the inhalable range
284 for all cryo-milled FP (**Figure 3**, panel “size”), in accord between laser diffraction, suspension-
285 based analytics and microscopy.¹³ The amounts of the sieved fragments were below 0.5% of
286 cryomilling output, and were provided for ecotoxicological testing. Additionally, FPs produced by
287 sanding CNT_POM_FP were consistent in size with the other FP generated by cryo-milling, as
288 the CNT_POM_FP had < 1 % passed through a 2.7µm filter, and < 60 ppm were below 0.1 µm
289 (both w/ and w/o CNT); 3 % of the CNT_cement_FP passed through a 2.7 µm filter, and 100 ppm
290 were below 0.1 µm.¹⁹ High resolution images reveal protrusions of the inorganic Fe₂O₃ pigment
291 and CNTs at the surface of corresponding fragments (red arrows in **Figure 2**), whereas the lower

292 concentration and lower electron density of OrgPig caution against an interpretation of absence of
293 protrusions from SEM results.

294



295 **Figure 2** SEM scans to characterize surface structures of a)-c) ENM (representative for lifecycle
296 SYN phase) and d)-f) fragments of NEP containing the same ENM (FP, representative for lifecycle
297 USE phase). a) CNT; b) halogen-organic diketopyrrolopyrrole pigment red 254 (OrgPig); c) Fe₂O₃
298 pigment red 101; d) FP of nanocomposite CNT_epoxy; e) FP of nanocomposite OrgPig_PP; f) FP
299 of nanocomposite Fe₂O₃_PE. Red arrows highlight protrusions of ENM on FP surfaces. See
300 **Figure SI_1** for pure matrix control fragments and whole-particle scans.

301

302 “Protrusions”^{22, 39} of ENM on the surface of fragments were investigated by multiple approaches:
303 surface chemistry (XPS, elements and C(1s) line shift identification), hydrophobicity (sessile water
304 drop contact angle), morphology Scanning Electron Microscopy (SEM). As hypothesized in the

305 introduction, the surface of all investigated FP materials is mainly composed of carbon (**Table**
306 **SI_3** and **Figure 3**, panel “surface chemistry”). In case of the epoxy-based materials, further
307 elements such as carbon and nitrogen are present in higher contents as well. The XPS
308 quantification of different species by C(1s) line shift (**Figure SI_2**) analysis finds a *surface* content
309 of CNT in CNT_PP_FP of 4.3%, which is slightly increased above the *bulk* content determined by
310 ICP-MS of 2.7%. Also the Al and Co acid leaching analysis showed that the CNT are accessible
311 to the liquid phase on the surface of the CNT_PP fragments, as these released Co and Al (**Figure**
312 **SI_3**). The biologically accessible concentration of Al was deduced to be 27.0 $\mu\text{g}/\text{m}^2$ on FP with
313 CNT and 7.6 $\mu\text{g}/\text{m}^2$ without; the respective values for Co were 2.3 $\mu\text{g}/\text{m}^2$ and 0.1 $\mu\text{g}/\text{m}^2$ (**Table**
314 **SI_4** and calculation there). Correcting for the control background, and using the diameter, density
315 and metal content in this specific CNT grade, we deduce from the acid leaching that 6.2 % of the
316 surface area provide contact to CNT. Considering the approximations made, this value is in
317 excellent accord with the XPS result and predicts that protrusions of ENM modulate the surface
318 chemistry of FP, but do not dominate it. For CNT in epoxy and for Fe_2O_3 in PP however, leaching
319 results are convoluted by contaminations of the matrix with the target analytes (Al, Fe) (results in
320 the SI). Further work will aim at determining whether these metals are embedded in the NEP or if
321 the NEP fragmentation process contaminates the FP. The same methods of XPS line shift, tracer
322 ion release and TEM analysis, found significant protrusions on brittle CNT_epoxy²² or
323 CNT_cement,³⁹ but low prevalence in tough materials such as CNT_POM or CNT_PP.^{39, 40} This
324 is in accord with our results.

325 For organic pigment, XPS line shape analysis identifies an enrichment at the FP surface with up
326 to 9% on the FP surface compared to 0.21% within the FP bulk (**Figure SI_2**), but may be less
327 reliable because only CNTs emit C(1s) photoelectrons at a distinct energy shift, whereas the

328 organic pigment signal overlaps with the PP matrix signal. The water contact angle was considered
329 as simple measure of surface-mediated (extrinsic) interactions. The contact angle results highlight
330 that the FP surface hydrophobicity is clearly dominated by the matrix, not by the ENM (**Figure 3**
331 panel “surface chemistry” and **Figure SI_7**).

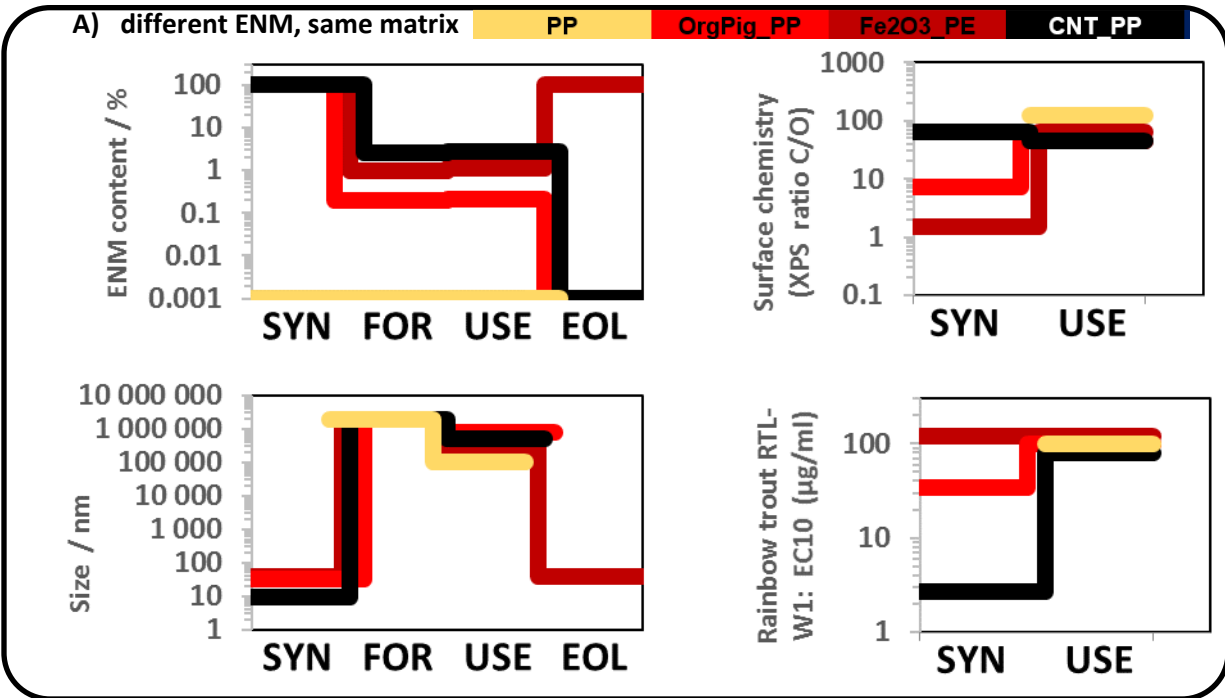
332 Surface chemistry controls nano-bio-interactions, but also impacts fate and transport. In
333 biologically irrelevant media such as a 1:1 acetone:water mixture, the FP can be solubilized and
334 dispersed, but in environmentally relevant media such as artificial fresh water with or without
335 natural organic matter the FP remain agglomerated and tend to float (especially the polyolefins PE
336 and PP). In accordance to the results from laser diffraction reported earlier,¹³ no significant fraction
337 below 1µm diameter was detected by measurements with the nanospecific methods of DLS and
338 CSA, using either SDS or SRHA as dispersants. By the nanospecific counting method of TRPS,
339 all FP showed the presence of fragments in a size range between 200 and 800 nm, but the number-
340 based concentrations ranged between 10^6 and 10^7 #/ml for 10g/l FP suspensions (**Table SI_5**).
341 This converts to a low ppm level mass content of fragments with diameters below 1µm.

342 In a very condensed presentation of size, surface chemistry and composition, **Figure 3** summarizes
343 the dramatic changes of physical-chemical properties along the NEP lifecycle.

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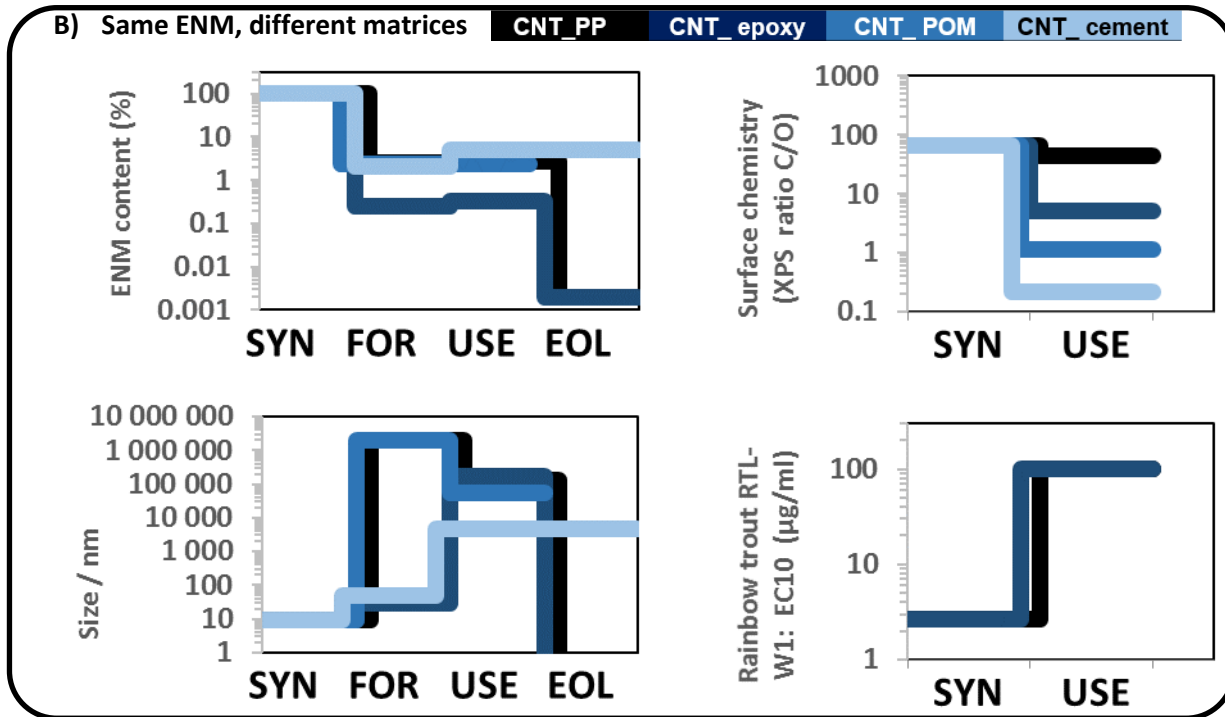
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Figure 3 Tracking nano-enabled products along their lifecycle stages SYNthesis, FORMulation, USE, End-Of-Life: A) different ENM, same matrix; B) same ENM, different matrices. Panels summarize the key descriptors of Size (median diameter), Composition (ENM content), Surface

353 Chemistry (C/O ratio) and Ecotoxicity (represented by our most sensitive assay, rainbow trout
354 RTL-W1). Ecotoxicity EC10 values are lower limits for the USE phase. Color code of NEPs is
355 indicated above the figure and matches Table 1. See beginning of results section for the scenario
356 assumptions on SYN-FOR-USE-EOL phases.

357

358

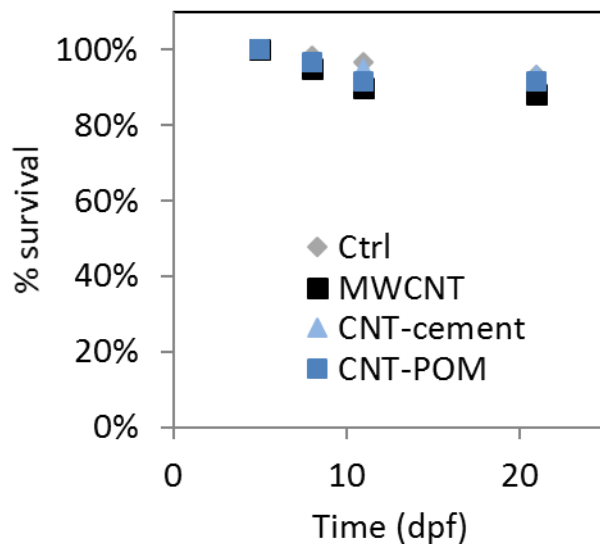
359 *Ecotoxicity effect characterisation*

360 No hatching or survival rate of zebrafish *embryos* were affected by CNT or the FP (**Figure SI_5**),
361 likely due to low heavy metal content from the CNT and little to no penetration through the chorion
362 of the embryos. With the pore size of the chorion being at the range of 200~500 nm, it was
363 anticipated that there was little to none penetration of CNT and FP into the chorionic space. As
364 shown in **Figure 4**, both CNT and CNT-composite showed little to no toxicity as reflected by the
365 survival and growth of zebrafish *larvae* subject to aqueous exposure. Even though in the zebrafish
366 assay CNT were protruding and entirely biologically accessible after shaking in solution or
367 sonication from CNT-cement_FP (**Figure SI_4**), whereas there was no protrusion from CNT-
368 POM_FP, the composites showed no adverse effects on zebrafish embryo hatching as well as
369 survival and growth of zebrafish larvae. These results show that CNT nanocomposites do not
370 appear to have negative impact on zebrafish. Zebrafish embryo hatching was previously
371 demonstrated to be affected by heavy metal ions, such as Zn^{2+} , Cu^{2+} , Ni^{2+} and Cr^{3+} .²⁸ The lack of
372 hatching interference observed here suggests that the heavy metal leaching, observed only in HCl
373 to reach ppb levels during 22h (**Figure SI_3**), remained low during the test but may contribute to
374 long-term effects in the environment. One may differentiate that only free ENM are biologically

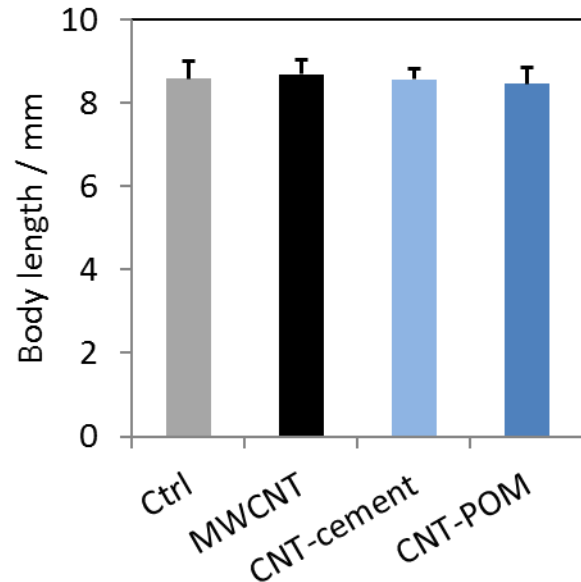
375 available in the sense that they can be taken up, whereas ENM protrusion on a larger fragment are
376 only accessible in the sense that they interact with e.g. the chorion or cell membrane.

377

378 A)



B)



379

380 **Figure 4.** Aquatic compartment screening on zebrafish *larvae*: Both A) survival (standard
381 deviation of N=30 replicates were determined for each time point and were below 5% for all) and
382 B) body length at day 14 showed no statistically significant differences between the control and
383 exposure of CNT and FP. Pulse exposure was performed on 5, 8 and 11 dpf (day post fertilization)
384 (see scheme in **Figure 1**). See **Figure SI_5** for zebrafish *embryo* development and growth results.

385

386

387 Results of the toxicity of the original material and of the FP (SYN and USE phases, respectively)
388 on RTL-W1 cells, represented as the most sensitive assay, are summarized by **Figure 3** and **Figure**
389 **SI_6**. In both fish cell lines, RTL-W1 and CLC, the original NM (SYN phase) caused decreased
390 cell viability. The lowest EC50 was detected in RTL-W1 cells by means of the 5-

391 carboxyfluorescein diacetate acetoxymethyl ester (CFDA-AM) assay, 23.56 ± 5.0 $\mu\text{g/ml}$. The
392 toxicity in the CLC cells was below EC50 hence this was not calculated. The exposure of cells to
393 the FP (USE phase) did not cause any toxicity, even at the maximal concentration used, 100 μg
394 FP/ml. However, 100 μg FP/ml contains nanomaterials at <5 $\mu\text{g/ml}$. In addition to this low
395 concentration of NM, the low density of FPs causes their flotation and hence the contact with the
396 cells was minimal. Other alternatives, as cells in suspension instead of attached to the bottom of
397 the plates or an inverted culture should be tested in future to enhance the sensitivity of the assay,
398 as demonstrated for PP-based incineration-FPs.^{41, 42}

399 On ammonia oxidizing bacteria, the reference products and the pristine nanomaterials Fe₂O₃ Red
400 101, Organic Pigment Red 254 and CNT showed no effects at test initiation and after 28 days. A
401 comparable result was found for the fragmented products Fe₂O₃_PE, OrgPig_PP, and CNT_epoxy,
402 although for Fe₂O₃_PE and CNT_epoxy at 1000 mg/kg dry matter soil inhibitory effects of 23%
403 and 38%, respectively, were determined at test start. However, this effect could not be confirmed
404 after 28 days of incubation. The results are presented in **Table SI_4**. Thus, after 28 days, EC50
405 values were above 1000 mg/kg dry matter soil for all products tested. No impact occurred on the
406 biological function/microbial activity of the sewage sludge neither on the elimination of dissolved
407 organic carbon nor on the denitrification and nitrification processes. There were no effects due to
408 the pristine and fragmented products observed on the activity of the ammonia oxidizing bacteria
409 over 140 days after application of the nanomaterials via sewage sludge into soil.

410 Results for *E. crypticus* showed no effects on survival for any of the FP (**Figure 3, Figures SI_7**
411 **and SI_8**). Effects in terms of reproduction showed increased sensitivity, with the pure NM (SYN
412 phase) having different EC10, specifically OrgPig had a measurable effect (EC10=2009mg/kg),
413 but not Fe₂O₃ or CNT. All FP, both NM-containing FP and the pure polymer FP (pure PE, pure

414 epoxy, pure PP) caused no effect in the tested range (0-3200mg/kg). Such results are not
415 unexpected given the low degradability of the tested matrix or the low fraction of NM embedded
416 in the matrix. The added characterization of the NEP further confirms the hypothesis. Of note, for
417 OrgPig_FP, a 10% reduction in reproduction occurs for 800 mg/kg although no effects occurred
418 at higher concentrations. A non-monotone dose response has been reported before for Ag²⁶ and
419 Ni⁴³. This could be related to the potentially reduced agglomeration at lower concentrations hence
420 higher exposure and effects. However, we do not have evidence to support this hypothesis for the
421 FP with or without embedded ENMs.

422 **Figures 3** and **Table 1** summarize the results of our explorations: At the ENM concentrations
423 tested, the NEP matrix properties dominated the intrinsic and extrinsic FP properties, including
424 their ecotoxicity in a wide range of assays covering sludge, soil, and fish. Two orthogonal
425 comparisons help to identify the mechanisms:

- 426 a. The surface chemistry, hydrophobicity and the size of fragments assimilate in the USE
427 phase of different ENM in the same matrix. (**Figure 3a**, **Figure SI_7**)
- 428 b. Conversely, for one type of ENM in NEPs with different matrices, the surface chemistry
429 and size of USE phase fragments diversifies. (**Figure 3b**)

430

431

432 **Table 1:** Effects of USE phase Fragmented Product (FP) tested in various ecotoxicity assays.¹ No
 433 FP elicits a significant effect. NT: Not Tested.

	PP	OrgPig_ PP	Fe ₂ O ₃ _ PE	CNT_ PP	CNT_ epoxy	CNT_ POM	CNT_ cement
RTL-W1 EC10	> 100 µg/mL	> 100 µg/mL	> 100 µg/mL	> 100 µg/mL	> 100 µg/mL	NT	NT
CLC EC10	> 100 µg/mL	> 100 µg/mL	> 100 µg/mL	> 100 µg/mL	> 100 µg/mL	NT	NT
Soil microflora EC10	> 1000 mg/kg	> 1000 mg/kg	> 1000 mg/kg	NT	> 1000 mg/kg	NT	NT
STP biology EC10	NT	NT	> 6000 mg/kg	NT	NT	NT	NT
E. crypticus EC10 repro.	> 3200 mg/kg	>3200 mg/kg	> 3200 mg/kg	> 3200 mg/kg	> 3200 mg/kg	NT	NT
ZF embryo NOAEL	NT	NT	NT	NT	NT	> 5 mg/ embryo	> 5 mg/ embryo
ZF larvae NOAEL	NT	NT	NT	NT	NT	> 50 mg/mL	> 50 mg/ mL

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 435

¹ RTL-W1, fibroblast from biliary ducts of rainbow trout. CLC, macrophage cell line from carp,. *Enchytraeus crypticus* survival is not affected, results reported are EC10 of reproduction. Soil microflora, short-term potential ammonium oxidation test based on ISO Guideline 15685. STP biology, biological function of a sewage treatment plant (STP) based on OECD Guideline 303A. ZF embryo, zebrafish embryos exposed to the water-accomodated fraction of the FP mass indicated, assessing hatching percentage and survival rate vs. control embryos. ZF larvae, zebrafish larvae exposed repeatedly to the water-accomodated fraction of the FP concentration indicated, assessing body length and survival rate vs. control larvae.

436 Both categories of lifecycle-induced ENM transformation, assimilation of properties and
437 diversification of properties by product formulation and fragmentation, have been predicted earlier
438 by Mitrano et al.¹⁰ Here we studied specific examples with polymeric and cementitious matrices
439 with organic, carbonaceous and inorganic ENM, and explore their implications for environmental
440 hazards. In both transformation categories, we find that the physical-chemical properties of the
441 bulk matrix predominantly determine the physical-chemical properties of the fragments released
442 during USE, with little modulation by the ENM that was embedded in the NEP. With the specific
443 ENM and matrices, the ecotoxicity of fragments released during the lifecycle of NEPs is not
444 affected by the ENM.

445 However, the validity of each individual ecotoxicity assay –that were not developed for FP testing–
446 is challenged by one or other FP property. For some materials (low density of polyolefins)
447 floatation limits the delivered dose; this is, however, no issue for FP testing of epoxy, POM and
448 cement, which are denser than water. Further, the size range of the tested fragments is larger than
449 generally adequate for the tests and species. To reduce this uncertainty, we sieved away 99.5% of
450 the larger particles so that exposure was targeted to smallest sizes. And yet, for organisms like *E.*
451 *crypticus*, the FP sample contains fragments that can be larger than the organisms themselves. A
452 detailed discussion can be found in a recent opinion paper.⁴⁴ Enchytraeids and other oligochaetes
453 are exposed via soil ingestion and skin adsorption, hence in this case risk is reduced or absent via
454 exposure. Also the absence of adverse effects on the microbial soil compartment are at least
455 partially due to the reduction of exposure, because the thermoplastic matrices have low
456 degradation and diffusion.^{9, 45} No effects on soil microflora were found for relatively long periods
457 up to 140 days, but also a high bacterial resilience may contribute to this absence of effects.
458 Follow-up options include long term aging of FPs before testing or much longer term biota

459 exposure. Additional species can be added, e.g. filter feeding marine organisms may be susceptible
460 both to direct effects of microplastic particles⁴⁶ or to vector effects of adsorbed toxicants.⁴⁷ One
461 may speculate that toxicant affinity is modulated by the surface chemistry, even if we found surface
462 chemistry to be dominated by the matrix, not by the ENM.

463 There is no directly comparable study on nanocomposites. One paper reported an unconventional
464 ecotoxicity assay by exposing fruit flies to an environmentally aged CNT-composite, finding no
465 specific effects.⁴⁸ Seven papers assessed the toxicity for humans by sanding fragments released
466 from NEPs, and focused on inhalation exposure^{19, 22, 49-53} and oral exposure⁵⁴. For paints and
467 plastics NEPs with silica, titania and CNT additives, the studies report no additional toxicity by
468 the ENM in the primary target organ,^{19, 22, 49-54} only one study found secondary effects in the
469 liver⁵³. Models for environmental risk assessment currently assume the fate and effects of NEP to
470 be determined by ENM properties.⁶ This assumption needs to be revisited in light of the present
471 finding of NEP environmental effects determined by *matrix* properties, and of their significant
472 differences in key physical-chemical properties such as composition, size, surface chemistry.¹¹ We
473 designed the studies to explore the possible modulation of ecotoxicity by nanomaterial additives
474 in plastics/polymer/cement. We found no such modulation despite a systematic variation of (Fig.
475 3A) different nanomaterials and (Fig. 3B) different matrices and (Table 1) test organisms
476 representing different environmental compartments. In a separate paper, the Predicted
477 Environmental Concentrations (PEC) based on material-flow exposure models for nanomaterials
478 and Predicted No Effect Concentrations (PNEC) were estimated with species sensitivity
479 distribution models. PEC/PNEC risk ratios were obtained for the case studies, species and
480 environmental compartments described above and indicate no risks based on the given data.⁵⁵

481 With regard to our primary motivation by nanomaterial risk assessment, the present results lend
482 support to grouping of ecotoxicity during the USE phase: the group would be defined by the *matrix*
483 material, potentially limited to a certain maximum ENM content that is relevant for ENM
484 application as functional additive (typically below 5%). The ecotoxicity of fragments emitted
485 during the USE phase would be read across from the pure matrix material. The grouping by matrix
486 would probably fail for easily hydrolysible matrices,⁸ which would release free ENM and were not
487 tested here, and for NEPs using dissolving ENM such as Ag, CdTe, which were tested and
488 reviewed elsewhere.^{9, 56-58} Further, secondary fragmentation and release of free ENM may occur
489 during transport to the final sink in soils or sediments over time scales longer than the standard
490 test duration for organisms. However, secondary ENM release by weathering and migration was
491 independently tested on the identical NEP, and found strong containment by the polyolefin
492 matrix.¹⁶ Another experimental study on tire wear found up to 0.045% releases of free ENM for
493 secondary UV/hydrolysis degradation, as this only affects a sub- μm -thin surface layer of many-
494 μm -diameter FP particles.⁵⁹ Further, any secondary fragmentation by UV degradation is again
495 mostly determined by the matrix, with benchmarks of labile (epoxy), intermediate (Polyamide,
496 POM) and resilient (PE, PP, cement) matrices.²¹ Thus, grouping by matrix can be applied to a wide
497 range of matrices and ENM that is delimited by the intended persistence during use.

498 As a secondary interpretation, one may identify the FP material as microplastics. The size range
499 and composition match the definition of e.g. the Danish EPA.⁶⁰ Plastics, including commodity
500 plastics with widespread use, are routinely colored with pigments such as Fe_2O_3 , whereas the
501 Organic Pigment Red 254 is rather a high-performance pigment class, and CNTs are currently
502 lower volume material.¹⁵ Our results on PP, POM, epoxy and PE, with and without ENM, can be
503 interpreted as one of the first studies on the effects of microplastics on organisms in soils, fish, and

504 on the sewage treatment plant biological activity. We found no significant effects up to the highest
505 concentration tested. Of note, considerations of physical-chemical similarity as proposed by Hüffer
506 et al.¹¹ would position our mechanically shredded plastics with hydrophobic, irregular surfaces
507 and low aquatic dispersability as more similar to real world secondary microplastics of polyolefin
508 (packaging), polyamide (fishery nets)⁶¹ or rubber (tire wear)⁶⁰ than charge-stabilized polystyrene
509 beads that are simply more convenient in (eco)toxicity assays.⁶² “The SUN approach” thus
510 contributes to environmental hazard screening of both nano- and micro-structures.

511

512

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516

517 **Supporting Information:** additional SEM scans of shape and surface structure of FPs;
518 composition and preparation of nanomaterials and NEPs; micronisation of NEPs to FPs; physical-
519 chemical properties of FPs in tabular format expanding the graphical representation in Figure 3;
520 FP surface chemistry analysis by XPS line shape and acid leaching; FP dispersability in ecological
521 media; preparation of FP water-accomodated fractions for zebrafish testing; zebrafish larvae
522 results; soil microorganism results; cytotoxicity results; *E. crypticus* results.

523

524

525 **Glossary / List of abbreviations**

526 AFW: Artificial freshwater

527 BSA: Bovine serum albumin

528 CFDA-MS: 5-carboxyfluorescein diacetate acetoxyethyl ester

529 CNTs: Carbon nanotubes

530 CSA: Centrifugal separation analysis

531 DLS: Dynamic light scattering

532 dpf: days post fertilization

533 DW: Distilled water

534 EOL: End of life

535 ENM: Pristine engineered nanomaterials

536 ERT: Enchytraeid reproduction test

537 FOR: Formulation

538 FP: Fragmented products

539 HDPE: High density polyethylene

540 hpf: Hour post fertilization

541 NEPs: Nano-enabled products

542 OrgPig: Di-keto-pyrrolo-pyrrole

543 PE: polyethylene

544 PEC: Predicted environmental concentrations

545 PNEC: Predicted no effect concentrations

546 POM: Polyoxymethylene

547 PP: Polypropylene

548 SDS: Sodiumdodecylsulfate

549 SEM: Scanning Electron Microscopy

550 SRHA: Suwannee river humic acid

551 STP: Sewage treatment plant

- 552 SYN: Synthesis
- 553 TEM: Transmission Electron Microscopy
- 554 TRPS: Transient resistive pulse sensing
- 555 WFPs: Weathered fragmented products
- 556 XPS: X-ray photoelectron spectroscopy
- 557

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