

June 17, 2026

The Honorable Ron Mariano
Speaker of the House
State House Room 356
Boston, MA 02133

The Honorable Aaron Michlewitz
Chair, House Ways and Means
State House Room 243
Boston, MA 02133

Re: Opposition to Amendment #172 – Protecting Horseshoe Crabs

Dear Speaker Mariano and Chairman Michlewitz:

On behalf of MassBio and our over 1,700 members, we write to respectfully express our opposition to Amendment 172 to H5510, which would phase out the harvesting of horseshoe crabs that play a critical role in safety testing for vaccines, biologics, injectable medicines, and medical devices.

MassBio supports the amendment's underlying goal of sustainably managing the horseshoe crab population in Massachusetts and addressing bait-harvesting practices that threaten it. We also understand that there is no intent to disrupt lawful biomedical use of horseshoe crabs. And while the amendment allows the collection of horseshoe crabs for educational or scientific purposes, it does not specifically address collection for biomedical, pharmaceutical, medical device, public health, or FDA-related safety testing uses.

Horseshoe crab-derived limulus amoebocyte lysate (“LAL”) plays a significant role in safety testing and is used to detect endotoxin contamination before products reach patients. LAL is critical to the biopharmaceutical supply chain and a required step for the safe manufacture and distribution of every implantable medical device and injectable pharmaceutical. It is currently the FDA-approved gold standard product for endotoxin contamination testing in biopharmaceutical products. Without this vital, proven substance, the biopharmaceutical supply chain is susceptible to contamination, and patient safety would be at risk.

MassBio also supports the development and appropriate use of alternatives to horseshoe crab-derived LAL. While new synthetic alternatives continue to advance, they are not a complete substitute for LAL today. Further, the new alternatives lack LAL’s proven track record of effective testing for endotoxin contamination, which could leave patients at increased risk if horseshoe crab research is limited by this amendment.

For the reasons stated above, MassBio opposes Amendment 172 as currently drafted. While we support the Amendment's underlying conservation goals, we encourage the addition of explicit protections for lawful biomedical and public health uses. MassBio also welcomes the opportunity to be a resource as this issue continues to move forward.

Thank you for your time and consideration of this testimony. Should you have any questions or require additional information, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'KBO', with a stylized, cursive flourish.

Kendalle Burlin O'Connell
CEO & President
Massachusetts Biotechnology Council (MassBio)