



HB0275: Environment – PFAS Chemicals – Prohibitions and Requirements (George “Walter” Taylor Act)

Health and Government Operations

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Monica Mercola, Public Employees for Environmental Responsibility (PEER)

FAVORABLE

Public Employees for Environmental Responsibility, or PEER, is a nonprofit organization dedicated to protecting our environment and civil servants who safeguard it.

We support HB0275 to restrict the use and disposal of PFAS chemicals. Prohibiting PFAS in firefighting foam, food packaging, and in rugs and carpets is necessary to protect our health and the environment. High levels of PFAS contamination are associated with suppressed immune function, thyroid disease, testicular and kidney disease, cancers, and liver damage.ⁱ Additionally, high levels of PFAS may decrease the effectiveness of the body to respond to vaccines or create a more severe reaction to COVID-19.ⁱⁱ Unless we act now, the problems associated with contamination will grow exponentially worse as PFAS build up in the environment.

Restricting PFAS as a class of chemicals, rather than individually, is essential to avoid a chemical whack-a-mole. The traditional approach of managing each chemical individually fails because the chemical industry routinely replaces old compounds with new PFAS that are just as toxic. Additionally, the high persistence of PFAS as a class combined with the consistent rate of emission, means that PFAS will necessarily attain higher concentrations in the environment, leading to “widespread, long-lasting, and increasing contamination.”¹ Restricting PFAS as a class in firefighting foam, food packaging, and rugs and carpets will help protect children and families from toxic chemicals while holding polluters accountable.

Maryland must take control as the Federal government has ignored PFAS contamination. The EPA does not regulate the more than 12,000 different types of PFAS.ⁱⁱⁱ The Toxic Substances Control Act (TSCA) investigates chemicals only after reports of harm. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) does not require manufacturers to disclose inert ingredients in their products. Neither the Resource Conservation and Recovery Act (RCRA) nor the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

¹ Ian T. Cousins, et.al., *Why is high persistence alone a major cause of concern?*, DOI: 10.1039/C8EM00515J (Perspective) Environ. Sci.: Processes Impacts, 2019, 21, 781-792, <https://pubs.rsc.org/en/content/articlehtml/2019/em/c8em00515j>; see also Carol F. Kwiatkowski et. al., *Scientific Basis for Managing PFAS as a Chemical Class*, ACS PUBLICATIONS, (June 30, 2020) <https://pubs.acs.org/doi/10.1021/acs.estlett.0c00255>.

consider PFAS hazardous. Maryland must fill this void by restricting the use and disposal of PFAS through HB22.

Therefore, the only way we can guarantee the safety of our environment, our children, and ourselves is to stop PFAS at their source.

Thank you.

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ⁱ <https://www.atsdr.cdc.gov/Toxfaqs/TF.asp?id=1116&tid=237>

ⁱⁱ <https://doi.org/10.1101/2020.10.22.20217562>

ⁱⁱⁱ https://comptox.epa.gov/dashboard/chemical_lists/pfasmaster