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September 25, 2025

Honorable Danilo Burgos, Majority Chairman
House Consumer Protection, Technology & Utilities Committee
Pennsylvania House of Representatives
106 Irvis Office Building
Harrisburg, PA 17120-2166

Honorable Carl Walker Metzgar, Minority Chairman
House Consumer Protection, Technology & Utilities Committee
Pennsylvania House of Representatives
216 Ryan Office Building
Harrisburg, PA 17120-7021

RE: Informational Meeting on PFAS and other "Forever Chemicals" and their Uses in
Consumer Products

Dear Chairmen Burgos and Metzgar:

AGC Chemicals Americas ("AGCCA") and its parent company, AGC America, Inc., appreciate this opportunity to provide comments to the Pennsylvania House Consumer Protection, Technology & Utilities Committee following the recent informational meeting on PFAS and other "Forever Chemicals" and their uses in consumer products.

AGCCA manufactures and supplies a range of specialized industrial chemicals and materials, including resins, coatings, films and membranes, that are incorporated into a wide range of products essential to the daily lives of Pennsylvania residents and businesses, such as wiring insulation for airplanes and electric vehicles, electrical components for cell phones and computers, and gaskets, fuel lines and seals for motor vehicles and manufacturing equipment.

Many of these products are comprised of fluoropolymers. While fluoropolymers fall within the broad definition of "PFAS," they are very different from other PFAS chemicals. From a health and environmental standpoint fluoropolymers are inert, non-toxic, and are not bioavailable. Importantly, they do not dissolve in water, so they cannot migrate to groundwater and do not dissolve in wastewater or drinking water. In fact, peer-reviewed studies demonstrate that fluoropolymers satisfy internationally-recognized criteria for being "Polymers of Low Concern," which are deemed to have insignificant environmental and human health impacts.

Fluoropolymers also provide a unique combination of physical, chemical and electrical properties that enhance the safety, reliability and durability of products under a wide range of operating conditions. These properties make fluoropolymers critical to the performance of a wide range of products and technologies, such as semiconductors, fuel cells, wind turbines, printed circuit boards, coated wires, batteries, aircraft components, vehicle engines, manufacturing equipment, medical devices and prosthetics, and scientific and laboratory equipment. This unique combination of properties underlies the irreplaceability of fluoropolymers in a wide range of applications, including those noted above.

As the Committee and the State legislature considers how best to address PFAS, we would urge the Committee and the legislature to not take a one-size-fits all approach to regulating products containing PFAS. Instead, the focus should be to ensure that any PFAS regulations or limitations going forward are focused on those PFAS chemicals that present risks and exclude fluoropolymers and products containing fluoropolymers. In that effort, AGCCA would recommend the Committee and the legislature look to other states that have enacted similar laws to promote consistency across the country. For example, New Mexico has recently enacted a PFAS product bill (HB-212) which exempts fluoropolymers, recognizing that this will prevent the unintended prohibition of hundreds of thousands of essential products, while still ensuring the intent of this bill is satisfied – protecting human health from exposure of harmful PFAS. AGCCA would also like to highlight other elements of the New Mexico bill for the Committee's consideration, such as the definition of "intentionally added," the bill's limited focus to consumer products and minimal agency discretion for expansion.

These suggestions will help preserve our 150 jobs, including over 80 employees who are members of the United Steelworkers Union, in the Commonwealth and provide the right recognition of the beneficial nature and uses of fluoropolymers that our company compounds and distributes right here in Pennsylvania.

We appreciate your consideration of these comments and are available to work with you and the Committee to discuss and continue to improve any proposed legislation.

Regards,



Christopher F. Correnti
President & CEO & General Counsel
AGC America, Inc.

Cc: Members of the House Consumer Protection, Technology & Utilities Committee



September 23, 2025

Pennsylvania House Consumer Protection, Technology & Utilities Committee Informational Hearing, PFAS and Consumer Products

Chairman Burgos, Chairman Metzgar, and members of the House Consumer Protection, Technology & Utilities Committee, thank you for the opportunity to participate in today's discussion regarding PERFLUOROALKYL AND POLYFLUOROALKYL substances or PFAS. My name is Robert Simon, and I help support the American Chemistry Council's product specific work on this important issue at the state, federal and international levels. This also includes the industry's overall stewardship efforts.

As the Committee considers this issue, ACC would like to reinforce the following key points:

1. **Today's PFAS are integral to thousands of products that that we use every day and are an important enabling technology for key sectors of the economy.** PFAS are a diverse universe of chemistries that are critical to thousands of products we use every day and are absolutely essential to American manufacturing. Just about every sector of the economy relies on this critical chemistry, including defense, automotive, semiconductors, electronics, artificial intelligence, energy development, pharmaceuticals, healthcare, building and construction, and agriculture.
2. **All PFAS are not the same.** PFAS is an umbrella term for a broad class of chemistries that have fundamental differences, as well as different health and environmental profiles. For example, they include solids, liquids, and gases. Consequently, it is not scientifically accurate or appropriate to group all PFAS together.
3. **The reality is that the majority of PFAS that have been the focus of attention are no longer produced in the US, Europe, and Japan.** As some of you may know, in 2006 eight major manufacturers voluntarily joined the U.S. EPA's Stewardship Program, investing over \$700 million in research and development. This included a commitment to cease the manufacture and use of PFOS and PFOA-related chemicals and also an agreement for new PFAS chemistry to undergo enhanced regulatory review before being permitted on the market.
4. **There is growing recognition by policy makers at the state, federal and international levels of the important distinction within this broad class of chemistry and that there are many critical applications where fluorochemistry can be used safely.** At the state level, of the 30+ states that have enacted PFAS policies, over 94% have taken a focused approach to regulating this important chemistry. This is also increasingly recognized at the federal and international levels.

As society, we want and need smart, effective policies in this area. We have worked with policymakers at the state, federal and international levels on targeted solutions that address potential concerns with PFAS chemistries while continuing to allow their safe use and the many important products and industries that they

enable. Industry has a shared interest in advancing science-based regulation and wants to avoid a patchwork of different and conflicting policies, so we want to work together to advance smarter and more effective public policies that protect human health and the environment while recognizing the many different types of PFAS and their critical uses.

We appreciate the opportunity to testify today and hope we can be a resource on this issue for the Committee.

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Know your environment.
Protect your health.

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Good morning, Chairman Burgos, Chairman Walker-Metzgar, and other members of the House Consumer Protection, Technology and Utilities Committee. Thank you for the opportunity to testify.

My name is Melanie Benesh, and I am a Vice President for Government Affairs for the Environment Working Group. EWG is a national environmental health organization that has sought to address the harms caused by PFAS for more than two decades.

EWG is proud to support this proposed legislation eliminating needless uses of PFAS from key consumer products.

None of us consented to be contaminated with toxic chemicals that are so persistent that they are known as “forever chemicals.” Nevertheless, [99 percent](#) of us, including [newborn babies](#), have PFAS in our blood, according to the Centers for Disease Control and Prevention.

The [harms](#) caused by exposure to PFAS are well understood, including increased risk of certain cancers, harm to the reproductive and immune systems, harm to the kidneys and thyroid, high cholesterol, and increased risk of cardiovascular disease.

Many of us have [levels of PFAS](#) in our blood that place us at greater risk of these health harms. Experts estimate that [25 percent](#) of Americans have elevated levels of PFAS in their blood serum. According to the CDC, [9%](#) of us have more than 20 nanograms per milliliter of PFAS in our blood, or the level above which [experts](#) recommend tests for kidney and testicular cancer. Only [2%](#) of us have levels of PFAS in our blood so low that the usual standard of care is recommended.

While we can't completely eliminate exposure to PFAS, we can significantly reduce our exposures by eliminating needless uses of PFAS from everyday products. By eliminating the needless use of PFAS in cosmetics, dental floss, juvenile products, and menstrual products, we are eliminating an important additive route of exposure, which is especially important for communities, like many in Pennsylvania, that have already been disproportionately exposed to PFAS through their drinking water and food.

Let me be clear: we're not proposing to ban all uses of PFAS. This legislation is simply proposing to phase out needless uses of PFAS in a small subset of products we bring into our homes, schools, businesses, and places of worship.

We don't need PFAS to make our cosmetics waterproof.

We don't need PFAS to make our dental floss glide.

We don't need PFAS to make our juvenile products stain-resistant.

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We don't need PFAS to make menstrual products absorbent.

How do we know? We know because [hundreds of companies](#) already make these products without PFAS and even more will soon.

Sephora, Whole Foods, and Credo, and many other companies make their personal care products without PFAS. Walmart and Amazon sell dental floss without PFAS. Major baby product brands like Bumblebee, Chicco, and Clek, are made without PFAS. Thinx, Knix, and other menstrual product brands do not use PFAS in their products and some test regularly for the presence of PFAS.

Hundreds of companies have already stopped using these toxic chemicals, and thousands more are finding safer alternatives.

Moreover, all companies will soon have to phase out, or may have already phased out PFAS in these products to comply with [other state laws](#). Ten states, representing more than a quarter of the U.S. population (26.4%) have banned PFAS in some or all of these product categories. Because companies can no longer or will no longer use PFAS in cosmetics, dental floss, juvenile products, and menstrual products in those states, most companies are likely to phase them out nationally, making it easy and cost-effective to comply with Pennsylvania's proposed law. But a state law in Pennsylvania is the only way to ensure that all Pennsylvanians are safe.

Eight states have banned PFAS in juvenile products. PFAS has been banned in the same set of juvenile products as covered by this bill in California for more than two years, since July 01, 2023. Ten states have banned PFAS in cosmetics. For example, PFAS have been banned in cosmetics since January of this year in Washington and Colorado. Four states have banned PFAS in dental floss. And at least seven states have banned PFAS in menstrual products.

PFAS have been banned in cosmetics, dental floss, juvenile products, menstrual products, and seven other product categories since January 1st of this year in Minnesota. In just a few months, starting on January 1, 2026, PFAS will be prohibited in all four of these product categories and more in Maine. Both state bans are part of an effort to phase out all needless uses of PFAS.

These changes cannot come soon enough for residents of Pennsylvania, who are already overexposed to these toxic forever chemicals.

More than [247 communities](#) in Pennsylvania have so far detected PFAS in their tap water, including 169 communities with PFAS in their tap water above the national drinking water standard that was recently finalized.

Many Pennsylvania residents are drinking well water contaminated with unsafe levels of PFAS, including people living near military bases where PFAS was used in firefighting foam. PFAS has so far been detected in the groundwater of [18 military installations](#) in Pennsylvania, including Naval Air Station Joint Reserve Base Willow Grove.

Right now, nearly [1,300](#) Pennsylvania sites are likely using – and likely discharging – PFAS into the air and water. There are no limits on these industrial discharges, and we are only beginning to understand the scope of these releases.

The new national drinking water standard will significantly reduce PFAS exposures. [Thousands of lives](#) will be saved – by reducing the risk of cancer, by reducing infant deaths caused by low birth weights, and by reducing the risk of heart attacks caused by cardiovascular disease.

But much more is needed if we want to reduce the number of Pennsylvania residents with too much PFAS in their blood.

In particular, we must do more to reduce the routine exposures caused by the products we bring into our homes, like the ones covered by this bill. Consumers – and state legislators – should not wait for the federal government to address unnecessary uses of PFAS in our everyday products.

- The Food and Drug Administration has [understood](#) the risks posed by PFAS longer than any other federal agency – since the 1960s – but still defends some uses of PFAS in food packaging and food manufacturing.
- The Consumer Product Safety Commission has sought information on the uses of PFAS but is required, [by law](#), to defer to voluntary product safety standards that are typically drafted and developed by industry.
- While the EPA has taken action to address PFAS in drinking water, the EPA has [no plans](#) to restrict the use of PFAS in everyday products.

The [General Services Administration](#) and the [Defense Department](#) have changed some procurement policies to avoid some uses of PFAS. But, the federal agencies with the power to protect consumers will not be acting any time soon – if ever.

Once again, it will be up to states to protect us from PFAS.

Consumers cannot simply “shop around the problem” because the presence of PFAS is not disclosed on most of the products we bring into our homes.

Don’t believe those who insist there are too many PFAS, or that some PFAS are better than others, or that all PFAS have been thoroughly reviewed, or that some PFAS are not actually PFAS, or seek to turn this into a referendum on all uses of PFAS or insist that changing formulas and recipes will make basic goods unaffordable.

We all know that the everyday products we bring into our homes can be made without these toxic forever chemicals. We also know that companies will have little incentive to change their products unless states like Pennsylvania act to protect us.

Thank you for the opportunity to testify.

Testimony for Pennsylvania House Consumer Protection, Technology and Utilities Committee
Informational Hearing on PFAS in Consumer Products
Sep 23, 2025

Good morning Chair Burgos, Chair Metzgar, and members of the House Consumer Protection, Technology & Utilities committee. My name is Katie Blume, and I am the Political and Legislative Director with Conservation Voters of Pennsylvania or CVPA. CVPA is an environmental advocacy organization dedicated to ensuring that all Pennsylvanians are protected from pollution threats and have access to clean air, water, and land. Today, I come before you to address a critical issue that directly impacts the safety and health of our families and loved ones: the presence of Perfluoroalkyl and polyfluoroalkyl substances (PFAS) in everyday consumer products.

PFAS is a group of synthetic chemicals that have been in use since the post-WW2 manufacturing boom. It is used in several consumer and industrial products, as it has several commercial benefits, such as its resistance to water, heat, and oil. Not all PFAS chemicals are alike, as they have different chemical structures and differ in size, from big polymers to small molecules. Studies have shown that PFAS can contain more than 1,400 individual chemicals and have been used in more than 200 different applications. PFAS are often referred to as "forever chemicals" due to their persistence in both the environment and the human body. Alarmingly, most of these substances have not been thoroughly assessed for their potential toxicity. However, exposure to the most thoroughly studied PFAS chemicals has been linked to numerous adverse health effects, including increased incidence of thyroid disease, immunotoxicity, carcinogenicity (specifically kidney and testicular cancers), elevated cholesterol levels, and reproductive and developmental toxicity.

A 2022 review by the American Academy of Pediatrics highlighted the specific vulnerabilities of children to PFAS exposure. Children are at greater risk due to their lower body weight, differences in water and food intake, developing organ systems, and the fact that they often breathe closer to the ground.

Everyday Pennsylvanians are unknowingly exposed to PFAS on a regular basis. For example, during a typical shopping trip, a Pennsylvania household might purchase pizza packaged in grease-resistant paper, a raincoat and yoga pants treated with water-resistant materials, cosmetics like nail polish, and personal care products such as dental floss, sunscreen, and menstrual products. Even their smartphones, with fingerprint-resistant screens, may contain PFAS. And as these products wear down, household dust becomes a new source of PFAS exposure, particularly for infants and young children who spend more time on the floor.

While consumer education is important, it is unrealistic to expect consumers to avoid such a wide array of products. It is unacceptable that consumers purchasing essential health products, like dental floss and sunscreen, should have to worry about endangering themselves or their loved ones.

In Pennsylvania, we have begun to see bipartisan efforts to address PFAS, including HB 1116: PFAS Biosolids Testing by Rep. Pugh, HB 1415: Increased Testing for PFAS in Public Water

Systems by Rep. Isaacson, and SB 611: Pennsylvania PFAS Classification and Cleanup by Senator Collett. Representative Scott currently has a cosponsor memo circulating that would prohibit the use of PFAS in cosmetics, dental floss, juvenile products, and menstrual products. It has already gained bipartisan support, and we look forward to the bill's introduction.

Beyond consumer products, we've also seen significant progress made towards reducing PFAS in other applications. On July 1st of this year, the PA House of Representatives unanimously passed House Bill 1261, introduced by Rep. Brian Munroe, which prohibits the use of firefighting foam containing PFAS. This firefighting foam has been linked to elevated health issues within the ranks of our fire companies and military service members.

In April of last year, the Environmental Protection Agency established the first national standard for certain PFAS components in public drink water systems. This sets the maximum contamination level for PFAS and PFOA in drinking water to four parts per trillion, with public water systems being directed to meet this standard by April of 2029. Additionally, just this week EPA Administrator Lee Zeldin has elected to keep holding PFAS polluters accountable despite attempts from the chemical industry to roll back PFAS rules. While these efforts are commendable and worthy of our support, there is far more that we must do to protect consumers from PFAS in everyday products here in Pennsylvania.

Minnesota has provided a framework that Pennsylvania should follow. Minnesota enacted the most comprehensive PFAS prevention legislation in the nation, known as Amara's Law. This law is named after Amara Strande, a young woman diagnosed with a rare form of cancer due to PFAS contamination in her community. Amara bravely advocated for legislation that would ban all non-essential uses of PFAS and require manufacturers to disclose the presence of PFAS in their products.

Amara's Law is implemented in phases. Phase 1, which took effect at the beginning of this year, prohibits PFAS in eleven select product categories, including cookware, dental floss, and juvenile products like children's clothing, playpens, and toys. Phase 2, which takes effect on July 1, 2026, will require that all products containing PFAS meet specific requirements to ensure consumers are informed about what they are purchasing. Finally, Phase 3 of Amara's Law will prohibit PFAS in all products unless deemed "currently unavoidable." This phase will take effect on January 1, 2032, allowing producers time to adjust their supply practices accordingly.

This comprehensive approach, which prioritizes the most critical product categories, includes robust reporting requirements and customer labeling, and ultimately aims for safe, PFAS-free alternatives, is what Pennsylvania should strive to implement. It is essential for the health and safety of our communities as we move forward. Thank you for your time, and I look forward to answering your questions.

Sources

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Good morning, Chairman Burgos, Chairman Walker-Metzgar, and other members of the House Consumer Protection, Technology and Utilities Committee. Thank you for holding this hearing. I appreciate the opportunity to testify today on the important topic of addressing exposure to per- and polyfluoroalkyl substances or PFAS in Pennsylvania.

My name is Ian Louda and I'm the Southeastern Pennsylvania Legislative Coordinator for Clean Water Action. Clean Water Action is a national non-profit environmental organization with roughly 80,000 members across Pennsylvania. Since our founding during the campaign to pass the landmark Clean Water Act in 1972, we've worked to enact strong protections for our health and environment by bringing issue expertise, solution-oriented thinking and people power to the table.

Pennsylvania has already taken some initial steps to tackle PFAS. In 2023, the Pennsylvania Office of Attorney General filed a complaint in Pennsylvania Commonwealth Court against DuPont, Chemours, and Corteva for being in violation of Pennsylvania's Consumer Protection Law. As part of this action, former Attorney General Michelle Henry cited that these companies continued production and distribution of products containing dangerous PFAS that then cause's contamination denies Pennsylvanians of their basic environmental rights under Article 1, Section 27 of the Pennsylvania Constitution. In 2023, The Pennsylvania Department of Environmental Protection also established for the first time ever a state drinking water maximum contamination level for the most common constituents of these toxic chemicals. Just this year, all of you unanimous passed legislation that would protect our fire fighters from the dangers of PFAS through prohibiting its use in fire fighting foam and requiring labeling for turnout gear that contains it.

These initial steps, however, aren't enough given PFAS's pervasiveness in our environment and the threat it poses to our health with the Agency for Toxic Substances and Disease Registry at the Center for Disease Control and Prevention and Pennsylvania Department of Health finding associations between PFAS exposure and health effects like, lower antibody response to some vaccines, immune system suppression, increased cholesterol levels, pregnancy-induced hypertension, reduced fertility, liver damage, an increased risk of thyroid disease and the potential for cancer.

We must build upon these efforts and seek to tackle new frontiers of exposure. A good vehicle for that would be passing legislation that prohibits the manufacture or sale of juvenile products, menstrual products, cosmetics or dental floss in the Commonwealth that contain an intentionally added PFAS chemical. Clean Water Action and our members have supported such legislative efforts in past sessions.

A study by the University of Notre Dame that was published this summer in the journal Environmental Science and Technology analyzed 59 feminine hygiene products. Here's what we learned from that study.

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They shockingly found 33% of period underwear and 25% of reusable pads had intentional PFAS use — meaning the chemicals had been put there, likely to keep the products from leaking. While they didn't provide manufacturer names in their study, they did identify that the majority were US manufacturers. In addition, the scientists used newer technology to begin measuring neutral PFAS which have no charge but are thought to be linked to the same health harms as the ionic versions. This is important because neutral PFAS to this point have tended to fly under the radar but can be more easily absorbed through the skin or even mucous membranes because they can more easily move through fatty tissues. The new testing found an alarming amount of these neutral PFAS in some reusable period products. When measured, the neutral PFAS there were much higher concentrations — not parts per trillion, not even parts per billion, but levels at parts per million.ⁱ

Scientists at the University of Notre Dame also conducted another study several years ago which was also published in the journal of Environmental Science and Technology that found many cosmetics sold in the United States likely contain high levels of PFAS. The scientists tested more than 200 cosmetics including concealers, foundations, eye and eyebrow products and various lip products. According to the study, 56 percent of foundations and eye products, 48 percent of lip products and 47 percent of mascaras tested were found to contain high levels of fluorine, which is an indicator of PFAS use in the product. 29 of the products with high fluorine concentrations were tested further and found to contain between 4 and 13 specific PFAS, only one of these items tested listed PFAS as an ingredient on the product label.ⁱⁱ

While this may be emerging news to you, me, and the majority of Pennsylvanians, the fact is companies have KNOWN for decades that PFAS is dangerous, yet they've turned a blind eye to that and have continued to manufacture and sell products with PFAS at our expense. Previously released internal industry memos and studies prove that industry knew for decades that PFAS was dangerous, bioaccumulated in blood and were linked to terrible illnesses suffered by those exposed.ⁱⁱⁱ A story last year in ProPublica that was co-produced with the New Yorker documents how a 3M chemist showed executives back in 1997 that its PFAS chemicals were in people's bodies, something the executives already knew by the way. How did the executives respond? They responded by questioning the methodology, downplaying the findings, compartmentalizing the knowledge within the company and reassigning the lead chemist and her team so they couldn't continue their research.^{iv}

Now industry is going to tell you that they can't meet the demands of the prohibition like we're proposing. Well the process of eliminating PFAS in menstrual products, juvenile products, dental floss and cosmetics has already begun here in the United States with places like California, Connecticut, Colorado, Maine, Maryland, Minnesota, Nevada, New York, Oregon, Washington and Vermont adopting varying levels policies targeting all or a portion of these products.

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Knowing all this why would we continue to allow businesses to manufacture and sell products with INTENTIONALLY ADDED PFAS chemicals that come into direct contact and in some case intimately with the bodies of our wives, daughters, sisters, aunts and mothers; that our children interact with daily; and that ironically are meant to ensure the health of our teeth and gums.

We need legislation! Legislation further protects the health and safety of Pennsylvania families from toxic products, increases consumer trust and ensures that actions are not only taken in a timely manner but that there's appropriate oversight to make sure it gets done and gets done right. It also provides a level playing field for industry.

I encourage you to take up and support legislation that that prohibits the manufacture or sale of juvenile products, menstrual products, cosmetics or dental floss in the Commonwealth that contain an intentionally added PFAS chemical.

ⁱ <https://pubs.acs.org/doi/10.1021/acs.estlett.5c00553>

ⁱⁱ <https://pubs.acs.org/doi/10.1021/acs.estlett.1c00240>

ⁱⁱⁱ <https://annalsofglobalhealth.org/articles/10.5334/aogh.4013>

^{iv} <https://www.propublica.org/article/3m-forever-chemicals-pfas-pfos-inside-story>

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Written Comments

Submitted on behalf of the
Pennsylvania Chamber of Business and Industry

Public Hearing on Per- and Polyfluoroalkyl Substances (PFAS)

Before the:
**Pennsylvania House Consumer Protection, Technology and Utilities
Committee**

Presented by:

Amy Brinton
Director, Government Affairs

Harrisburg, PA
September 23, 2025

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Thank you for the opportunity to submit testimony today on behalf of the Pennsylvania Chamber of Business and Industry regarding regulatory and policy considerations surrounding per- and polyfluoroalkyl substances, commonly referred to as PFAS.

The PA Chamber is the largest broad-based business advocacy association in the Commonwealth, representing thousands of member businesses of all sizes and across all sectors. Our mission is to advance science-based policies that promote economic growth and opportunity while ensuring a high standard of environmental protection for all Pennsylvanians.

What is PFAS?

PFAS, or per- and polyfluoroalkyl substances, refers to a large group of human-made chemicals used for decades in industrial processes and consumer products due to their durability and resistance to heat, oil, water, and stains. These substances are found in a range of applications, from protective coatings and electronics to medical devices and energy technologies, that support modern life and economic activity.

However, the same chemical properties that make PFAS effective also prevent them from breaking down easily in the environment. As detection methods have improved, trace levels of PFAS have been found in water, soil, wildlife, and even humans. Understandably, this has raised concerns about potential health and environmental impacts.

PFAS is not a single chemical, but is in fact, a class of more than 10,000 different substances with varying structures, uses, and risk profiles. Certain PFAS compounds are more mobile or bioaccumulative than others, while some, including fluoropolymers like polytetrafluoroethylene (PTFE), commonly known as Teflon, are considered to be stable, inert, and low-risk. These fluoropolymers have a long-standing history of use in consumer products and critical applications such as medical devices. In fact, the U.S. Food and Drug Administration (FDA) recently reviewed the use of fluoropolymers in medical applications and concluded that “currently there is no reason to restrict their continued use in devices.”¹

¹ <https://www.fda.gov/medical-devices/products-and-medical-procedures/pfas-medical-devices>

Therefore, it is essential that PFAS policies and regulations recognize the significant differences among these substances, rather than treating all PFAS the same.

As federal and state regulatory efforts continue to evolve, a science-based, risk-driven approach is critical to avoid overly broad categorizations. Businesses across Pennsylvania, including those that do not manufacture PFAS, are already navigating new compliance requirements, supply chain uncertainties, and potential liability concerns. A balanced, thoughtful approach is necessary to protect public health while avoiding unintended consequences for employers, consumers, and the environment.

Balancing Environmental Protection and Economic Growth

The PA Chamber believes strongly that environmental protection and economic development can, and must, coexist, as environmental integrity and economic growth are not opposing forces. With thoughtful design and consistent application, science-based policies can deliver measurable environmental benefits while giving businesses the certainty needed to invest in Pennsylvania.

Striking the right balance is especially important in the case of PFAS, as scientific understanding is still evolving, treatment technologies are limited, and many companies are just beginning to assess their potential exposure and regulatory responsibilities.

To support both environmental protection and economic stability, PFAS policies and regulations must weigh environmental risks against economic impacts. Regulations should be clear, practical, and applied consistently to avoid confusion and costly delays. Regulatory certainty, through timely and predictable permitting, is essential to ensure that infrastructure, development, and public services are not disrupted by inconsistent or overly restrictive processes.

Avoiding Regulatory Overreach While Advancing Environmental Goals

Businesses thrive in stable, predictable regulatory environments. Overregulation, especially when driven by vague mandates, rapidly changing requirements, or duplicative standards, creates uncertainty that can delay investment, stall expansion, or drive companies to relocate to more business-friendly states.

A balanced, science-based regulatory approach is essential to achieving environmental objectives without sacrificing jobs or economic growth. One-size-fits-all mandates often fail to account for the diverse realities of industries, technologies, and communities. In contrast, flexible, outcome-driven policies encourage innovation, support compliance, and foster public-private collaboration.

PFAS regulations should reflect this approach. They must be designed to produce tangible environmental improvements without triggering unnecessary violations or penalties based on unclear standards or technicalities. Effective compliance frameworks should be grounded in science and shaped through meaningful stakeholder engagement, including the regulated community.

Impacts

As PFAS regulations evolve, it is critical that they do not impose unnecessary costs or burdens on Pennsylvania employers. Businesses of all sizes are already contending with increased costs related to energy, labor, and infrastructure. Rules that go beyond federal standards without strong scientific justification can undermine Pennsylvania's competitiveness and drive investment elsewhere. If the Commonwealth chooses to adopt PFAS standards that exceed federal baselines, there must be a clear, cost-effective rationale based on Pennsylvania-specific conditions and are supported by sound science.

The PA Chamber also supports regulatory frameworks that promote collaboration over enforcement. The state should work alongside industry to encourage compliance, share data, and drive continuous improvement. Additionally, many Pennsylvania businesses are already taking proactive steps to reduce or phase out PFAS use, adopt cleaner technologies, and support environmental health, often without a mandate. These efforts should be encouraged, not penalized.

Integrating PFAS Policy Across Pennsylvania's Environmental Framework

PFAS policy intersects with several key areas of environmental regulation, and a holistic approach is needed to ensure consistency and effectiveness:

Air

When addressing air quality, as with any PFAS-related policy or regulation, rules should be science-based, economically achievable, and aligned with national or international standards. They must also account for Pennsylvania's diverse industrial base and natural resources to avoid placing in-state businesses at a competitive disadvantage. Air-related regulations or standards should align take into account Pennsylvania's unique mix of industries and natural resources.

Waste

Waste-related policies and regulations should be grounded in risk-based principles. Classifying PFAS-contaminated materials as hazardous without clear thresholds or disposal alternatives could impose major costs with limited environmental benefit. Again, we urge policymakers to ensure that waste-related PFAS regulations are grounded in science and do not unnecessarily raise the costs of waste disposal. Classification of PFAS-contaminated materials as hazardous, without clear thresholds or viable alternatives, could impose major costs with limited environmental benefit.

Water

When developing water-related policies and regulations, equitable, science-driven approaches that fairly allocate responsibility based on actual impact are essential. Innovative solutions should be part of a broader, data-informed strategy for improving water quality. Strengthening water use data and long-term planning capabilities is also essential to managing current and future challenges.

Conclusion

The General Assembly and Administration have an opportunity to craft PFAS policy and regulations in a way that improves environmental outcomes, protects public health, while strengthening Pennsylvania's economy. We urge policymakers to move forward with a science-based, collaborative, and practical approach; one that promotes innovation, considers business realities, and keeps Pennsylvania competitive.

Thank you for your time and consideration. I'd be happy to answer any questions you may have.



September 23, 2025

PA House Consumer Protection, Technology & Utilities Committee
Informational Hearing, PFAS and Consumer Products

Chairman Burgos, Chairman Metzgar, and members of the House Consumer Protection, Technology & Utilities Committee, thank you for the opportunity to participate in today's discussion about PFAS and consumer products.

My name is Steve Kratz, and I serve as the President of the Pennsylvania Chemical Industry Council, representing the state's chemical and plastics manufacturing operations and associated industries

Pennsylvania's chemical, plastics, and support industries provide nearly **100,000 direct and related jobs**. The industry contributes over **\$14.4 billion** to the state's economy, pays nearly **\$2 billion** in wages, and contributes **\$782 million** in federal, state, and local taxes.

Nearly every aspect of modern life relies on chemistry. Chemistry is responsible for healthcare products and medical equipment, renewable energy products, high-performing building materials, military equipment, food packaging, electronics, clothing, vehicles, and more.

We appreciate the opportunity to participate in today's hearing to have a productive dialogue around PFAS and consumer products and to offer solutions where we can find common ground to advance effective, science-based policy that protects the environment and fosters growth.

As a starting point, it's important to understand that a broad definition of PFAS encompasses hundreds of chemistries with very different properties and purposes. Many of these are essential to national security, supply chains, transportation, renewable energy, healthcare, and durable consumer goods. A few examples of PFAS uses include electronics and wiring insulation, medical devices, refrigeration, data transmission, automotive, aerospace, semiconductors, protective coatings, batteries and storage, and military equipment.

The durable properties of PFAS are critical for responding to extreme temperature changes—hot or cold—to ensure that electronics don't catch fire, airplane components don't freeze and shatter, and military equipment can protect our nation. Fluoropolymers are used in construction for coatings, adhesives, and sealants for durability. The low-friction properties of

PFAS are essential for medical devices like catheters, stents, surgical patches, and medical implants. The coolants used in air conditioners and refrigerators also contain fluorinated chemicals.

While industry continues to explore certain viable alternatives for specific uses, the PFAS chemistries remain critical to these sectors because they are durable, stable and can be used safely. The fact is that in the United States and other advanced countries, industry has already phased out legacy chemical compounds, including PFOA and PFOS, which have been the primary focus of concern and regulation.

It's important to recognize that PFAS chemicals have unique environmental and health profiles to consider when evaluating any regulatory or legislative proposal. First, it is critical to include an accurate, science-based definition of PFAS to address the compounds of concern and allow for the continued use of durable, stable compounds for many critical uses. The other key area is to ensure that any legislation only addresses "intentionally added" PFAS.

Finally, it is important to differentiate the different types or sub-categories of PFAS. For example, one subset of PFAS chemicals, fluoropolymers have been demonstrated to meet key safety criteria, not bioaccumulate and to not break down into PFOA or PFOS, which are the primary areas of health and safety concern.

Overall, it is critical to distinguish between addressing the specific issues related to public health and safety versus the negative impacts of an outright, broad-based ban that is not warranted for this broad range of chemistry..

For example, Pennsylvania regulates gasoline and plastic pens very differently. They each derive from fossil fuels, yet they are regulated at the appropriate level based on unique properties and risk profiles. That is the collective, responsible approach we should undertake when evaluating the regulation of PFAS.

In closing, the PCIC fully supports the safe management of chemicals, including PFAS. I'm confident that together, we can advance science-based policies that drive impactful environmental solutions while also promoting economic opportunity and job growth.

Thank you for the opportunity to provide testimony today. We look forward to further discussion and questions.

###

Testimony on the Harms of PFAS (“Forever Chemicals”) in Consumer Products

PA House Consumer Protection, Technology & Utilities Committee |

Tuesday, September 23, 2025 | 10:00 AM

Stephanie Wein, PennEnvironment Clean Water & Conservation Advocate

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Hello everyone, my name is Stephanie Wein and I'm the clean water and conservation advocate at PennEnvironment, a statewide citizen-based environmental advocacy organization. We work to protect clean air, clean water, and open space with thousands of members across Pennsylvania. I want to thank the chair of the committee and the committee members for inviting me to testify today.

Over the last decade we've heard a lot - especially in Pennsylvania - about PFAS, which are also known as “forever chemicals.” And yet many Americans don't realize that a major source of PFAS exposure is actually in the products we use - it's in cookware, in our clothing, carpets and furniture; it's also in toys and in cosmetics and so many other day-to-day products.

The health problems posed by PFAS are well-established, yet sadly our laws have been slow to catch up. PFAS are called “forever chemicals” because they are nearly indestructible, and build up in our bodies and in the environment over time. PFAS are now so ubiquitous that nearly every American has these chemicals. And even exposure to small amounts over time can cause [significant health impacts](#). This class of chemicals, comprising thousands of specific chemicals under the umbrella of “PFAS” has been linked to kidney cancer, thyroid disruption, immune suppression, reproductive issues and developmental issues, alongside other health problems.

Preliminary research by the National Institute for Occupational Safety and Health (NIOSH) looking specifically at a widespread type of PFAS known as “PFOA”, indicates absorption through the skin can have similar outcomes as ingestion.¹

Of all these categories, most concerning to me is the presence of PFAS in some of the products we use in the most intimate contact with our bodies and with our babies and young children. Given we absorb PFAS chemicals at much higher rates than previously thought,² It is imperative that lawmakers pay special attention to exposure risk from PFAS in baby products and personal care products.

Baby products

¹ Shane et al, “[Immunotoxicity and allergenic potential induced by topical application of perfluorooctanoic acid \(PFOA\) in a murine model](#),” *Food and Chem. Toxicology*, 136, February 2020.

² Tom Perkins, “[Toxic PFAS absorbed through skin at levels higher than previously thought](#),” *The Guardian*, June 30, 2024.

Baby products frequently contain PFAS, which is particularly concerning since infants' developing bodies are uniquely vulnerable to PFAS impacts like hormone disruption.³ Testing done of popular infant products by the Environmental Working Group found high levels of PFAS in bedding - which is particularly concerning, given the amount of time babies spend in their cribs - as well as in bibs and clothing.⁴

At the same time, testing done by Environmental Health News using an EPA-certified lab found that of the 40 brands of diapers tested, 23% contained organic fluorine, a strong indicator of the presence of PFAS.⁵

This is particularly alarming since babies are uniquely vulnerable to the effects of PFAS for a variety of reasons:

1. **Sensitive and permeable skin** - Babies' skin is thinner and more permeable, providing less of a protective barrier to chemicals in the environment.⁶
2. **Endocrine disruption** - Babies and young children are more vulnerable to the endocrine-disrupting effects of PFAS. Our endocrine system encompasses all of our hormones, which are critical signals for the growth, development and functioning of the human body. As a baby's body grows, it is laying the foundation for all of internal organ systems for their entire lifetime, and endocrine disruption at this critical juncture can have far reaching effects. There is a robust body of evidence that exposure to endocrine-disrupting chemicals can impact fetal, neonatal and childhood growth, and the development of the reproductive system as well as the onset of puberty, with estrogen-mimicking effects linked to an earlier age of puberty in both boys and girls.⁷ Early puberty's effects are far-reaching. This includes mental health and behavioral issues, but also shortening the window for children to learn important things like language, math and other critical life skills.⁸
3. **Immune suppression and reduced vaccine efficacy in a vulnerable population** - There is also an emerging body of evidence that the presence of PFAS in the body can suppress the immune system,⁹ with a committee convened by the National Academies of Science, Energy and Medicine determining that there is "sufficient evidence for an association of PFAS exposure with decreased antibody response to vaccination or infection." This means that PFAS exposure increases the risk to babies and young children, whose

³ Alan Woolf and Lauren Zajac, ["Report outlines health effects of PFAS chemicals in children, provides recommendations for testing,"](#) *American Academy of Pediatrics News*, September 21, 2022.

⁴ Sydney Evans and Ketura Persellin, ["New baby textile product tests show concerning levels of toxic 'forever chemicals,'"](#) Environmental Working Group, November 3, 2022.

⁵ EHN Editors, ["PFAS chemicals on your baby's diapers: new testing finds evidence of 'forever chemicals,'"](#) in popular brands of both disposable and reusable cloth diapers," Environmental Health News, November 2, 2023.

⁶ Eung Ho Choi, ["Skin Barrier Function in Neonates and Infants,"](#) *Allergy, Asthma & Immunology Research* 5:17(1):32-46, January 1, 2025.

⁷ Maria Averina et al., ["Early menarche and other endocrine disrupting effects of per- and polyfluoroalkyl substances \(PFAS\) in adolescents from Northern Norway,"](#) *Environmental Research* 242(1): February 1, 2024.

⁸ Niousha Dehestani et al., ["Developmental brain changes during puberty and associations with mental health problems,"](#) *Developments in Cognitive Neuroscience* 60, April 2023.

⁹ Abigail Blin et al., ["Public Health Risks of PFAS-Related Immunotoxicity Are Real,"](#) *Current Environmental Health Reports* 11(2): 118-127, March 25, 2024.

developing immune systems are more susceptible to infections like RSV and influenza than healthy adults. It also means that the many of the vaccinations parents expect will protect their babies from serious illness could be less effective in the face of PFAS exposure.¹⁰

4. **Impacts on weight and metabolism:** In a study of pre- and postnatal exposure to PFAS, a positive correlation was found between prenatal PFOA levels and IL-1beta, a pro-inflammatory molecule linked to weight gain and poorer metabolic health.¹¹

Personal Care Products

As vulnerable as babies may be, the risks posed by PFAS in consumer products don't end as we age. PFAS exposure in adults is also linked to immune suppression, as well as prostate, kidney and testicular cancers, thyroid dysfunction, disruptions to both the male and female reproductive system, higher cholesterol and poor metabolic health - and yet it's commonly found in many types of personal care products.

Take dental floss as an example: We put **dental floss** directly into our mouths and, when our gums bleed, this floss comes into direct contact with our bloodstream.¹² Concerningly, top brands of dental floss often contain PFAS chemicals. Procter & Gamble's Oral-B floss contains PTFE,^{13,14} the same form of PFAS found in non-stick pans, while other brands contain GenX, another form of PFAS.¹⁵

PFAS is also commonly found in many types of **cosmetic products**. In testing done at the University of Notre Dame of 231 widely available cosmetics, evidence of PFAS was found in 47% of mascaras, 55% of lip products and 63% of foundations.¹⁶ These are products we apply, often daily or multiple times a day, and that get absorbed through our skin.

Even more concerning is that the same Notre Dame research team found PFAS in **menstrual products**, including tampons, pads and liners.¹⁷ These are products we apply to some of the most absorptive parts of our bodies and deserve a particularly high level of scrutiny, as pharmaceutical research has indicated that these particular membranes can allow chemicals to enter the bloodstream from ten to *eighty* times the rate of chemicals applied to the rest of our skin.^{18,19}

¹⁰ National Academies of Sciences, Engineering, and Medicine. [Guidance on PFAS exposure, testing, and clinical follow-up](#). The National Academies Press; 2022

¹¹ Eleni Papadopoulou et al., "[Prenatal and postnatal exposure to PFAS and cardiometabolic factors and inflammation status in children from six European cohorts](#)," *Environment International* 157. December 2021.

¹² Katherine Boronow et al., "[Serum concentrations of PFASs and exposure-related behaviors in African American and non-Hispanic white women](#)," *Journal of Exposure Science & Environmental Epidemiology*, 29: 206–217. January 8, 2019.

¹³ Sydney Cook, "How to Choose Dental Floss Without PFAS and Other Harmful Chemicals," *Consumer Reports*, January 18, 2025. Accessed September 23, 2025.

¹⁴ Ibid.

¹⁵ Heather D Whitehead et al., "[Fluorinated Compounds in North American Cosmetics](#)," *Ecotoxicology and Public Health*. June 15, 2021.

¹⁶ Jessica Sieff, "[Scientists find PFAS in feminine hygiene products](#)," *Notre Dame News*, August 11, 2023.

¹⁷ Sushma Srikrishna, Linda Cardozo, "[The vagina as a route for drug delivery: a review](#)," *International Urogynecology Journal* 24(4), December 13, 2012.

¹⁸ Vorontsova, Y., et al., "[Pharmacokinetics of vaginal versus buccal misoprostol for labor induction at term](#)," *Clinical and translational science*, 15(8). June 20, 2022.

I could fill the next hour listing the many threats PFAS poses to human health, but I'll instead focus on the one that is less discussed and also most personal to me, which is the connection researchers are now drawing between PFAS exposure and pre-eclampsia.²⁰

Pre-eclampsia is a complication of pregnancy where dangerously high blood pressure combines with damage to the kidneys and other organs.²¹ Resulting from a dysfunction of the immune system within the placenta, it is the leading cause of maternal death in the United States, as well as one of the leading causes of stillbirth. And recent research has revealed a compelling link between the presence of PFAS in the mother and her risk of pre-eclampsia.²² As someone who *only* survived pre-eclampsia during my pregnancy because of emergency medical intervention, and who will live with the cardiac complications the rest of my life, it is my strong feeling that our personal care products should not put us at an elevated risk for cancer, for thyroid or metabolic dysfunction, or for pre-eclampsia.

When PFAS can have such a devastating impact on our health, why is it so common in the products that we apply to our bodies every day? All Pennsylvanians should be able to trust that the products being sold on the shelves are safe. Whether Pennsylvanians are flossing their teeth, putting on lipstick or buying baby supplies for their growing family, we shouldn't need to worry about being exposed to toxic chemicals.

And consumer vigilance alone is insufficient: PFAS are often present even included in many products labeled as "non-toxic," a marketing phrase that isn't regulated and provides no guarantee the product is PFAS-free. For example, Consumer Reports has found many products are labeled "PFOA-free," contain a different type of PFAS known as PTFE,²³ misleading even a wary consumer.

Fortunately, we have policy solutions at our fingertips. **PennEnvironment supports legislative efforts to phase out PFAS in baby products, menstrual products, cosmetics and dental floss** and we applaud the efforts of Representative Greg Scott and Natalie Mihalek to protect Pennsylvanians from PFAS in products we use to care for ourselves and our children.

This issue of PFAS has recently taken on an increased urgency for me, not just as an advocate but as a parent. Having recently welcomed my first child, a little girl, knowing what I know about PFAS and the risks it poses, I'm concerned about what she will be exposed to in the very products I'm bringing into our home to care for her and keep her safe. I shouldn't need to worry

²⁰ Nurliana Abd Mutalib et al., "[Maternal perfluoroalkyl and polyfluoroalkyl substances \(PFAS\) exposure and preeclampsia: a systematic review and meta-analysis](#)," *BMC Pregnancy and Childbirth*, 25:279 March 13, 2025.

²¹ Eric AP Steegers, et al. [Pre-eclampsia](#). *The Lancet* 376(9741):631–644, 2010.

²² Nurliana Abd Mutalib et al., "[Maternal perfluoroalkyl and polyfluoroalkyl substances \(PFAS\) exposure and preeclampsia: a systematic review and meta-analysis](#)," *BMC Pregnancy and Childbirth*, 25:279 March 13, 2025.

²³ Mary Farrell, "[Best Frying Pans If You Want to Avoid PFAS Chemicals](#)," *Consumer Reports*, August 8, 2024. Accessed: September 22, 2025.

if there's PFAS woven into the fabric of her little footie pajamas, in her crib sheets or her diapers.
I should be able to trust these things are PFAS free.



Advocating for a diverse membership of grocers, manufacturers, convenience stores, wholesalers, distributors, retailers and service providers across the food and beverage industry

Testimony submitted by the Pennsylvania Food Merchants Association

House Consumer Protection, Technology and Utilities Committee

Informational Meeting on Consumer Product Per- and Polyfluoroalkyl Chemicals (PFAS) Chemicals

September 23, 2025

PFMA is a statewide trade association advocating the views of the food and beverage retail industry. Our membership includes convenience stores, supermarkets, independent grocers, wholesalers, consumer product vendors, national and regional chains and locally owned independent businesses of all sizes operating in Pennsylvania. We represent more than 600 corporate members who operate more than 3,000 retail food stores and employ more than 350,000 Pennsylvanians.

Thank you for the opportunity to share our perspective on this important issue.

Known collectively as PFAS, per- and polyfluoroalkyl substances are a collection of synthetic chemicals used in a broad range of products, from firefighting foam to food packaging. PFAS chemicals, of which there are more than 7,800 types, were first introduced in the 1940s and contain useful qualities including heat and water resistance, and in cookware are noted for their non-stick properties.

PFAS have been dubbed “forever chemicals” because they are extremely stable, slow to break down and certain types have been shown to accumulate over time in the environment and in human bodies.

Certain PFAS that the US Food and Drug Administration has found impactful to human health, including those known as PFOA and PFOS, are no longer manufactured in the US, though they are still used internationally and find their way into the country in imported products.

FDA authorization requires that available data show there is a reasonable certainty of no harm under the intended conditions of use. In 2020, the FDA announced a voluntary phase-out of certain PFAS used in food packaging. Under this agreement, PFAS manufacturers involved in the effort have been working to phase out specific PFAS chemicals by January 2024. The FDA is continuing to study the impact of PFAS in the food supply and assessing potential health concerns from these types of chemicals.

Fundamentally, our members agree with this approach and believe addressing PFAS is best done at the federal level. Many businesses in our association operate across multiple states and complying with varying standards, timelines and thresholds depending on the jurisdiction is extremely challenging, and in some cases simply unworkable. We would emphasize that this is not an expression of opposition to the goal of mitigating the presence of harmful PFAS chemicals in food packaging or other products. Rather it is support for a uniform, nationwide strategy that recognizes the myriad challenges faced along the supply chain as we all work towards a shared objective.

We appreciate the interest of the committee in this important issue. The association stands ready to serve as a resource as you continue your work.



**House Consumer Protection, Technology and Utilities Committee
Informational meeting on PFAS in certain consumer products and forever chemicals**

September 23, 2025

**Testimony of:
Jennie Shade, Senior Director of Government Relations**

Good morning, Chairman Burgos, Chairman Metzgar, and members of the House Consumer Protection, Technology, and Utilities Committee. Thank you for your invitation to provide testimony on PFAS in certain consumer products and forever chemicals.

My name is Jennie Shade, and I am testifying on behalf of the Pennsylvania Municipal Authorities Association (PMAA) which represents over 700 municipal authorities across the Commonwealth. Authorities provide essential services, including drinking water treatment and distribution, wastewater collection and treatment, solid waste management, and other community projects to roughly six million people in Pennsylvania. In addition, PMAA has over 500 associate members, including accountants, engineers, and solicitors who support authorities.

Municipal Authorities as Passive Receivers of PFAS

Municipal authorities neither manufacture nor profit from the commercial use of PFAS. Rather, they are passive receivers of these contaminants as PFAS enter drinking water sources, wastewater systems, biosolids, and landfill leachate through no fault or action of their own.

Once PFAS infiltrates public water and waste systems, municipal authorities are left to bear the burden of detection, regulatory compliance, and increasingly complex and costly treatment, often with little to no financial assistance or relief. This creates an inequitable and fundamentally flawed system in which municipal authorities, and ultimately the ratepayers they serve, are held responsible for cleaning up pollution they did not create.

PFAS Treatment is Technically Complex and Financially Burdensome

The removal of PFAS from drinking water, wastewater, and solid waste streams is not only scientifically complex, but also prohibitively expensive. Treatment technologies such as granular activated carbon, ion exchange resins, and high-pressure membrane systems come at a steep cost in both capital infrastructure and long-term operational expenses.

For many small and mid-sized authorities, particularly those in rural or economically disadvantaged

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communities, these costs are simply unsustainable. Compounding the challenge, even the most advanced treatment systems cannot always fully eliminate PFAS, and safe disposal of PFAS-laden residuals remains a serious environmental challenge.

Support for Extended Producer Responsibility and the Polluter Pays Principle

PMAA firmly supports the “polluter pays” principle and has incorporated this stance into our official advocacy platform. The following adopted resolution underscores our position:

Resolution 12-25

RESOLVED, That PMAA, in recognition of the fact that municipal authorities are passive receivers of PFAS compounds, support legislation, regulation, or policy that imposes the treatment cost of removing PFAS-related compounds from the Commonwealth's water on to PFAS manufacturers and those that use PFAS in commerce.

To that end, PMAA urges the General Assembly to advance policies that:

- Hold PFAS manufacturers and industrial users financially responsible for the contamination they cause, in accordance with “polluter pays” principles.
- Establish state-level funding or cost recovery mechanisms to support public water and wastewater utilities facing PFAS-related treatment demands.
- Promote upstream solutions, including source reduction strategies and mandatory product labeling to limit PFAS use and entry into the waste stream.

Preserve the Role of Municipal Authorities as Service Providers, Not Polluters

Any state or federal regulatory approach to PFAS, including potential liability provisions, must explicitly recognize the passive role of municipal authorities. These entities should not be unfairly penalized for receiving and treating PFAS-contaminated water and waste generated by upstream industries and consumers.

Instead, municipal authorities must be treated as essential partners in the collective response to PFAS contamination, not as sources of the problem. Preserving this distinction is critical to ensuring fair and effective environmental policy.

Conclusion

PMAA appreciates the Committee’s leadership in addressing the far-reaching impacts of PFAS on public health, the environment, and essential infrastructure. We remain committed to working collaboratively with the General Assembly and other stakeholders to protect Pennsylvania’s water resources, manage waste responsibly, and continue serving our communities. To accomplish these goals in a fair and sustainable manner, it is imperative that those responsible for PFAS contamination are held accountable, while municipal authorities that work tirelessly to mitigate its impacts are supported in their efforts to safeguard public health and the environment.

Again, thank you for the opportunity to testify before you today. I am happy to answer any questions.



September 22, 2025

Good morning, Chairman Burgos, Chairman Walker-Metzgar, and members of the House Consumer Protection, Technology, and Utilities Committee. Thank you for holding this hearing. We appreciate the opportunity to testify today on the crucial issue of addressing exposure to per- and polyfluoroalkyl substances (PFAS) in the Commonwealth of Pennsylvania.

My name is Alexis O'Donnell, and I am a Policy and Advocacy intern with Women for a Healthy Environment (WHE). I am joined by Michelle Naccarati-Chapkis, the Executive Director of WHE. Women for a Healthy Environment is a Pennsylvania-based environmental health nonprofit. WHE uses a scientific approach to achieve equitable lives free of environmental hazards through advocacy and community-based programs. Our organization tackles environmental challenges and fosters lasting, positive change and solutions that focus on creating a healthier environment. We are proud to celebrate our 15th anniversary this year.

Pennsylvania has already taken significant initial steps to address PFAS. In 2023, the Office of the Attorney General filed a complaint against DuPont, Chemours, and Corteva under the Consumer Protection Law for knowingly manufacturing and distributing PFAS-containing products that have contaminated our communities. That same year, the Department of Environmental Protection set, for the first time, a state-level drinking water standard for common PFAS chemicals. Additionally, this body unanimously passed legislation to protect firefighters by banning PFAS in firefighting foams and requiring labeling for turnout gear. These actions signify meaningful progress — yet they are not sufficient given the widespread contamination and well-documented health risks associated with these chemicals.

Although it has been discussed at length, we believe it is important to once again state the health impacts of PFAS, which is central to why we have submitted these comments. According to the Agency for Toxic Substances and Disease Registry (ATSDR), the Centers for Disease Control and Prevention (CDC), the Environmental Protection Agency (EPA), and the Pennsylvania Department of Health, exposure to PFAS has been linked to:

- Suppressed immune system function and reduced vaccine effectiveness,
- Certain types of cancer such as kidney, liver and testicular,



- Pregnancy-induced hypertension,
- Reduced fertility,
- Liver damage,
- Increased risk of thyroid disease, and
- Elevated cholesterol levels.

The maternal and child health implications are especially alarming. No family should have to worry that the products they use daily or the water they drink could harm their health or their children's future. Children are an especially vulnerable population, due to their rapid rate of growth and development.

Internal documents from PFAS manufacturers reveal that for decades the industry has been aware of the dangers associated with these chemicals, including their persistence in the environment and bioaccumulation in humans. Instead of taking responsibility, companies downplayed these risks and continued to profit while Pennsylvanians bear the health burdens.¹

Recent research highlights troubling pathways of exposure. A University of Notre Dame study published in *Environmental Science & Technology* found that 33% of period underwear and 25% of reusable pads contained intentionally added PFAS. These chemicals were used to prevent leaks but can be absorbed through the skin or mucous membranes, increasing exposure risks for women and girls.² Another study by the same team found high levels of PFAS in cosmetics, with more than half of tested foundations and eye products and nearly half of lipsticks containing fluorine, a PFAS indicator. Yet, only one product listed PFAS on its label.³

In 2024 Women for a Healthy Environment published a report, *Three Rivers, Fifteen PFAS*.⁴ We collected samples upstream of three wastewater treatment plant outfalls, as well as the mixing zone, where the discharge undergoes its initial dilution with the stream. Our study found that PFAS levels (both concentration and number of chemicals) were far higher in samples collected from the mixing zone compared to ambient surface water samples taken just upstream. What we rinse down the drain, including consumer products such as cleaning supplies and personal care products that contain PFAS, ultimately ends up in our rivers. Due to the high cost, only a few wastewater treatment plants have the ability to filter PFAS.

Other states, such as California, Colorado, New York, Washington, and Vermont, have already implemented policies restricting PFAS in consumer products. Pennsylvania must not fall behind.



Beyond the direct health impacts, PFAS contamination also carries serious economic and social costs. As noted above, municipalities across Pennsylvania have been forced to invest in expensive filtration systems.⁵ Property owners face declining home values when contamination is discovered and taxpayers ultimately shoulder the financial burden of cleanup.⁶ These hidden costs compound the health inequities we already see; disproportionately affecting low-income families and communities of color, who are often least able to afford bottled water, replacement products, or medical treatment. Addressing PFAS is not only a matter of public health, but also of fairness and fiscal responsibility.

We urge this Committee to advance legislation prohibiting the manufacture or sale of juvenile products, menstrual products, cosmetics, or dental floss containing intentionally added PFAS chemicals. Such a policy would:

- Protect families, especially children, from toxic exposures,
- Increase consumer trust and transparency,
- Ensure timely and responsible action, and
- Promote a level playing field for industry.

At Women for a Healthy Environment, we believe that a healthy environment is a fundamental right. Protecting families from toxic exposures is central to that mission. To that end, in 2024 we updated our PFAS Health Policy brief. We encourage you to review that comprehensive document.⁷ On behalf of the communities we serve, we respectfully request that you act now to reduce PFAS exposure and protect the health of Pennsylvanians.

Thank you for your time and consideration.

Alexis O'Donnell

Policy & Advocacy Intern

Michelle Naccarati-Chapkin

Executive Director



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