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WRITTEN STATEMENT

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ON BEHALF OF
THE ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

RHODE ISLAND GENERAL ASSEMBLY
HOUSE ENVIRONMENT AND NATURAL RESOURCES COMMITTEE

H. 7356
COMPREHENSIVE PFAS BAN ACT OF 2024
OPPOSED

MARCH 21, 2024

Chair Bennett and Vice Chairs Phillips & Carson, and members of the Committee, the Association of Home Appliance Manufacturers (AHAM) strongly urges the committee to consider a clarifying amendment to H. 7356 which would ban products from being sold in Rhode Island if the products contain PFAS substances.

AHAM members produce hundreds of millions of products each year. They design and build products at the highest levels of quality and safety. As such, they have demonstrated their commitment to strong internal safety design, monitoring, and evaluation/failure analysis systems. Together with industry design practices, test requirements, and redundant safety mechanisms PFAS chemicals play an important role in the safety profile of household appliances in their great resistance to high temperatures.

AHAM has conducted a member survey in a good faith effort to determine the extent to which PFAS is used in home appliances. AHAM members indicated portable and major kitchen appliances contain PFAS chemicals but in trace amounts, ranging from as low as 0.001 to 0.07 lbs. per unit. In almost all cases, the use of PFAS was confined to internal components and parts, such as bolts and washers, plastic brackets, and wire terminals with no direct exposure to consumers during use. This material is added during the manufacturing process, which reduces the potential for any consumer exposure during use or transmission to the environment.

In regard to the proposed 2027 cookware prohibition, AHAM understands the need to address PFAS that comes into contact with food being cooked in pots, pans, skillets, and utensils. This is an understandable priority product-chemical focus. However, because appliances are complex products with many internal components, **we support the below clarifying language**. Definitions are critical in state legislation and are vital to provide clarity to manufacturers for compliance with the law. Our suggested language below builds off and clarifies the products and parts of the products incorporated in this proposed 2027 ban.

Requirements

- *No person shall sell in the state cookware manufactured or imported into the United States on or after January 1, 2027 that contains intentionally added PFAS on any food contact surface.*
- *The state commissioner or agency may issue such actions necessary to implement this requirement or provide exceptions to this requirement.*

Definitions

- *"Cookware" means pots, pans, skillets, grills, baking sheets, baking molds, trays, bowls, and cooking utensils that are intended to come in direct contact with food during food preparation with applied heat.*

- *"Food contact surfaces" means surfaces that are primarily designed for or have the primary purpose of coming in contact with food during preparation.*

Thank you for the opportunity to present this written statement to the hearing record. AHAM strongly wants to work with Committee to ensure any law in this area is in the best interests of Rhode Island consumers. For future reference, my contact information is 202.872.5955 x328 or via electronic mail at jkeane@aham.org.

About AHAM: AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety, and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.