



LDA
Learning Disabilities
Association of America



4068 Mount Royal
Boulevard, Suite 224B,
Allison Park, PA. 15101

healthychildrenproject.org

412-341-1515

Date: 3/21/2024

From: Learning Disabilities Association of America

Re: **In strong support of H7356 - Comprehensive PFAS Ban Act of 2024**

Dear Chairman Bennett and Honorable Members of the Committee,

The Learning Disabilities Association of America's mission is to create opportunities for success for all individuals affected by learning disabilities through support, education, and advocacy. We have members in every state, including Rhode Island.

LDA's Healthy Children Project works on the preventable causes of learning, attention and developmental disabilities, including any chemicals linked to neurological harm or that have red flags showing the potential to impact brain health. LDA is writing today in strong support of the bill H7356, the Comprehensive PFAS Ban Act of 2024.

One in 5 American children have a learning or attention disabilityⁱ. The autism rate continues to rise now affecting 1 in 36 children, which has more than quadrupled since 2000ⁱⁱ. Approximately 18% of children in the United States have a developmental disabilityⁱⁱⁱ. The co-morbidity rate with other neurological disorders (e.g. ADHD, anxiety) is about 50%.

Rhode Island's percentage of students ages 3-21 receiving special education services is 17%, which is 2% higher than the national average^{iv}. In 2021, there were 21,697 students in grades K-12 receiving special education services in Rhode Island public schools. Of these children, 35% had a learning disability^v.

The etiology of learning and developmental disabilities may include one or more of a complex variety of factors, including genetics, substance abuse, social environment and environmental exposure to toxic chemicals.

According to the National Academy of Sciences Committee on Developmental Toxicology, **environmental factors, including toxic chemicals, cause about 3 percent of all developmental defects, and contribute to another 25 percent^{vi}**. This means that for over a quarter of these disabilities, a preventable chemical or other environmental exposure may be the trigger for the disability to manifest.

Per- and polyfluoralkyl substances, also known as PFAS chemicals, are man-made chemicals that are found in our food, water, air and products. PFAS chemicals pose significant health risks, particularly for pregnant women and children. PFAS are nicknamed "forever chemicals" because they are bio accumulative and don't break down (also known as PBT chemicals –



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Persistent, Bioaccumulative and Toxic). There is widespread human exposure and can stay in our bodies for years. They are such a concern that the EPA has already set a lifetime health advisory level for a few of these chemicals.

People are exposed to PFAS through contaminated food, water and air, from products containing these chemicals, and worker related exposures. PFAS chemicals are linked to many health concerns including certain types of cancer, disrupting the immune system including poor response to vaccines^{vii}, impaired liver function, high cholesterol, preeclampsia (potentially fatal pregnancy complication with high blood pressure), and birth defects.

We also know that studies have linked PFAS to impaired fetal development as well as interfering with the thyroid and low birth weight, which can then affect children's brains. **The CDC states that some studies in people have shown certain PFAS chemicals may affect "learning and behavior of infants and older children"**^{viii}.

In testimony before the U.S. Senate in 2019, Dr. Linda Birnbaum, the former head of the National Institutes of Environmental Health Sciences (NIEHS) and National Toxicology Program (NTP), stated: "The research conducted to date reveals associations between PFAS exposures and a variety of specific adverse human health outcomes. These include the potential for effects on children's cognitive and neurobehavioral development, immune system dysfunction, endocrine disruption, obesity, diabetes, lipid metabolism, and cancer."

Biomonitoring studies have shown that nearly every person in the US, including newborns, have PFAS in their bloodstream. Across the country and in our state, we continue to see a rise in reporting of contaminated water from PFAS former chemicals.

The banning of PFAS in food packaging and setting limits for PFAS in drinking water is a good first step but we need a more comprehensive a comprehensive ban on PFAS chemicals to prevent the continued contamination of our bodies, our waterways and our environment.

This comprehensive PFAS bill will phase out the sale of residential carpets or rugs, fabric treatments, cosmetics, cookware, juvenile products, outdoor apparel, artificial turf, menstrual products and firefighting foam that contain intentionally added PFAS. The bill will also phase out a leading source of PFAS contamination – PFAS chemicals in some firefighting foams. In addition, it will better protect our firefighters by giving preference to PFAS-free personal protective equipment. Finally, it will require the presence of PFAS to be disclosed publicly for any products not covered in the ban, giving consumers this important information.



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Please don't let industry fool you. This bill only bans the uses mentioned above. It will **not** impact other product categories. This bill will **not** impact truly critical products like medical equipment.

What this **bill will do** is phase out PFAS in product categories where there are already PFAS-free alternatives. This bill will reduce the amount of PFAS going into our bodies, our water, and our environment. This bill will reduce the immense costs of PFAS removal and remediation. This bill, over time, will reduce healthcare costs associated with illnesses caused by PFAS. This bill may, over time, even prevent some learning and developmental impacts and associated educational, mental and physical healthcare costs.

LDA has supported similar comprehensive PFAS bills in Maine and Minnesota. It's time for Rhode Island and other states to catch up and protect the people of our state.

Harmful forever chemicals should not be in our bodies, our soil, our water, our air and our environment. This bill is a start and only includes product categories with alternatives widely available. In order to protect children's brain health and the health of all Rhode Islanders, we must stop allowing the use of harmful chemicals like PFAS and only allow exemptions for truly critical uses without alternatives.

The Learning Disabilities Association strongly encourage you to pass H7356, the Comprehensive PFAS Ban Act of 2024.

Sincerely,

Tracy Gregoire
Healthy Children Project Director
Learning Disabilities Association of America

¹ [National Center for Learning Disabilities](#) 2015-2016 statistics.

² [Center for Disease Control and Prevention](#), prevalence of autism, 2023.

³ [Center for Disease Control](#), **Children aged 3-17 years with a developmental disability, 2015-2017**.

⁴ [National Center for Education Statistics](#). (2023). Students With Disabilities. *Condition of Education*. U.S. Department of Education, Institute of Education Sciences. Retrieved [date], from <https://nces.ed.gov/programs/coe/indicator/cgg>.

⁵ [Rhode Island Kids Count K-12 Students Receiving Special Education Services FB2022.pdf](#)

⁶ [Scientific Frontiers in Developmental Toxicology and Risk Assessment](#), Executive Summary, National Academy of Sciences Committee on Developmental Toxicology, 2000.

⁷ Grandjean P, Heilmann C, Weihe P, Nielsen F, Mogensen UB, Timmermann A, Budtz-Jørgensen E. 2017. Estimated exposures to perfluorinated compounds in infancy predict attenuated vaccine antibody concentrations at age 5-years. *J Immunotoxicol.* 14(1):188-195.

⁸ [Center for Disease Control and Prevention, September 2019, CDC and ATSDR Award \\$7 Million to Begin Multi-Site PFAS Study, https://www.cdc.gov/media/releases/2019/p0923-cdc-atcdr-award-pfas-study.html](#)