



COLLINS AEROSPACE | PRATT & WHITNEY | RAYTHEON

1847 West Main Road
Portsmouth, RI 02871

Chairman David Bennett
House Environment and Natural Resources Committee
RI State House
Providence, RI 02903

Re: Testimony of RTX Corporation (Raytheon) on H7356

Dear Madam Chair,

Thank you for the opportunity to offer this testimony on H7356, "COMPREHENSIVE PFAS BAN ACT OF 2024" (the "Act").

RTX Corporation ("RTX") was created in April 2020 with the merger of Raytheon Corporation and United Technologies Corporation. RTX is the largest aerospace and defense ("A&D") company in the world with more than 180,000 global employees. Throughout our three businesses – Collins Aerospace, Pratt & Whitney, and Raytheon – we are advancing aviation, engineering integrated defense systems for operational success, and developing next-generation technology solutions and manufacturing to help global customers address their most critical challenges. In particular, RTX provides products, integrated systems, and services for commercial, military and government customers across the globe. Such products and services support marine, land-based, aviation and space customers.

RTX employs approximately 1,000 workers in Rhode Island and operates a Raytheon facility in Portsmouth, where we produce world-class systems supporting the defense of the United States and its allies. The facility sits on more than 125 acres and employs approximately 250,000 square feet of engineering and manufacturing space.

RTX has a demonstrated commitment to health, safety, and the environment. Within this context, RTX has a robust chemical substance management program that governs our sites worldwide. RTX dedicates itself to environmental, social and governance (ESG) priorities and has been recognized as an industry leader in this area¹ based in part on our commitment to the environment and progress made toward achieving several ESG-related goals. We recognize and support the efforts of states like Rhode Island to implement reasonable programs to phase-out and replace certain chemical substances, while recognizing the unique needs and constraints of our sector in doing so.

RTX, including its Raytheon business, like other A&D sector businesses, has many critical dependencies on certain PFAS for the manufacture, maintenance, repair and overhaul of A&D products and equipment that are essential for the health, safety and functioning of society. The presence of PFAS is particularly important for the facilities, products and services we manufacture, sell and provide from our Raytheon facility in Rhode Island. For example, fluoropolymer containing materials are a necessary aspect of producing naval components at this facility. PFAS containing materials are typically present in such products to repel moisture, prevent corrosion, and handle extreme fluctuations in temperature and pressure.

While the A&D sector is actively engaged in an analysis of PFAS dependencies and potentially available alternatives in products, the unique demands of our uses and those of our suppliers and customers are often such that there are no immediate drop-in replacements available for many end use applications. PFAS are chemically stable and provide necessary resistance to heat and other extreme and critically important application conditions required of products manufactured in our sector.

¹ [JUST Capital 2024 Industry Leaders](https://justcapital.com/news/industry-leaders-just-100-2024/) (https://justcapital.com/news/industry-leaders-just-100-2024/).

Not surprisingly, all of the products, material, equipment and services used by the A&D sector are required to meet stringent requirements, specifications, and regulations of the federal government including the Federal Aviation Administration, the National Aeronautics and Space Administration, the United States Department of Defense (“US DoD”), and the United States Department of Homeland Security. The US DoD recently released a “Report on Critical [PFAS] Uses” (August 2023)² documenting the critical role PFAS chemistries serve in the defense of our nation. The US DoD’s report, mandated by Congress, warns of the sweeping impact to national security and our entire society if legislators and regulators take overly broad approaches to PFAS that limit or end their availability.

In the case of alternatives for materials in use in our sector, it can take a very long time to qualify, test and obtain regulatory agency approvals or certifications, as well as that of our customers, including defense customers. Non-PFAS alternatives that have reduced performance capabilities are simply not an option due to product safety, performance and quality requirements covering many critical functions, including flight safety, airworthiness, and defense capabilities. PFAS as a category of materials simply do not currently have alternative “drop-in” replacement options that will perform as well or better than what is currently in place. Non-PFAS alternatives that appear initially promising must be subjected to rigorous (and often resource intensive) testing and qualification processes that may take many years or even more than a decade to complete. Further, a failure at any step of the qualification process would disqualify an alternative from further consideration. And, although cost is not a determining factor, it is a consideration for implementing a qualified alternative.

RTX also has an extensive supply chain in Rhode Island, and many of our suppliers are small and medium-sized businesses. The challenges outlined above apply equally to our supply chain, both within and outside of Rhode Island.

Based on these complexities, the A&D sector is working collectively with stakeholder groups, legislatures and federal administrative agencies to help devise a workable plan for the responsible phasedown of PFAS over time that satisfies the end goals of the states, while allowing ongoing critical uses of PFAS in the sector. As this process occurs, we are respectfully requesting that this Committee support an exemption from this Act for “*Products required to meet Federal Aviation Administration, National Aeronautics and Space Administration standards, United States Department of Defense, or United States Department of Homeland Security requirements.*”

Without such an exemption for A&D products and services, RTX’s ability to manufacture, sell, distribute and service our products in Rhode Island and still meet our customer and regulatory obligations will be jeopardized. We urge this Committee to take this into account as it considers H7356.

Thank you for your consideration of these comments.



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² [Department of Defense Report on Critical Per- and Polyfluoroalkyl Substance Uses \(https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/reports/Report-on-Critical-PFAS-Substance-Uses.pdf\)](https://www.acq.osd.mil/eie/eer/ecc/pfas/docs/reports/Report-on-Critical-PFAS-Substance-Uses.pdf).