Sources, Transport, Exposure & Effects of PFASs
UNIVERSITY OF RHODE ISLAND SUPERFUND RESEARCH PROGRAM

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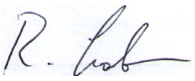
To the
Honorable David Bennett
Chair, House Committee on Environment and Natural Resources
82 Smith Street
Providence, RI 02903

I hereby submit written testimony **in support of the Comprehensive PFAS Ban Act (**H7356**) of 2024**

For background, per- and poly-fluoroalkyl substances (PFAS) are a group of more than 9,000 substances that have been produced since the 1940s and used in a broad range of consumer products and industrial applications. PFAS should be considered as a class based on persistence, production and disposal, and as leading scientists agreed to in the Madrid statement, it makes sense to approach their regulation as a class. For PFAS, given that they are basically all are extremely persistent, we have to worry about effects long after their intended use. Due to the large number of PFAS, and uncertainties about which exact compounds are manufactured and used, and chemical-by-chemical risk assessment is impractical, expensive and unrealistic to prevent further pollution. Current chemicals management typically relies on this risk-based approach, whereby society performs chemical-by-chemical risk assessments on those chemicals of highest concern, and only those chemicals with demonstrated risks are regulated. Experience has shown, however, that such a time- and resource-intensive risk-based approach is impractical, given the vast numbers of chemicals in use and lack of information on most of them.

Given the widespread human health concerns resulting from PFAS, reducing exposure to PFAS is paramount. The bill targets nonessential and substitutable applications of PFAS, that can easily be phased out quickly, as alternatives exist. Banning the use of PFAS in consumer products and fire fighting foams is a simple, common sense approach that will protect people in Rhode Island from unwanted and unwarranted exposure to PFAS. For fire fighting foams, the DoD has already paved the way, basically phasing out all F-containing fire fighting foams. The U.S. EPA concluded that any amount of PFOA and PFOS in drinking water is too high. In consumer products, 3M has just announced the end of their production of all PFAS by 2025. Within the European Union, a similar approach of phasing out all PFAS unless essential is being debated. Maine and Minnesota have already passed such bills. This is the right time to make sure that new products to be sold in RI will not contain PFAS any longer.
Sincerely,



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