



Washington, DC Office
1300 I Street NW
Suite 520 West
Washington, DC 20005-3314
T: 202.898.9064

 aem.org
 aem@aem.org
 Toll free: 866.236.0442

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Senator Tepler and Representative Doudera
Co-Chairs
Joint Standing Committee on Environment and Natural Resources
100 State House Station
Augusta, ME 04333

RE: Support - LD 987

Honorable Co-Chairs Tepler and Doudera and Members of the Joint Standing Committee on Environment and Natural Resources,

The Association of Equipment Manufacturers appreciates the opportunity to provide the following comments on LD 987 ahead of Monday's hearing in the Maine Joint Standing Committee on Environment and Natural Resources.

The Association of Equipment Manufacturers is the North American-based international trade group representing off-road equipment manufacturers and suppliers with over 1,100 member companies and more than 200 product lines in the agriculture and construction-related industry sectors worldwide. Our industry supports over 2,600 jobs throughout the state of Maine and contributes roughly \$248 million to the state economy every year.

The Association of Equipment Manufacturers (AEM) **supports** LD 987. AEM recognizes interest in managing PFAS contamination to protect the health of the state's citizens and the environment. The amendments made to Maine's law regarding PFAS, have already been an improvement. While this improvement was put in place, a significant segment of the off-road motorized vehicles and mobile and stationary motorized equipment that our members manufacture were inadvertently excluded from exemption. It is important that these products be included as they use components that are either the same as or like those used in motor vehicles and other products exempted from the law in 2024.

We therefore respectfully urge you to support LD 987.

The Association of Equipment Manufacturers (AEM) appreciates the importance of identifying and addressing the risks associated with heavy-duty, non-road equipment, whether from operator safety concerns, engine emissions, or chemical management issues. Original Equipment Manufacturers (OEMs) design products to satisfy various safety, regulatory, durability, quality, and customer requirements to effectively operate in various extreme and demanding environments with lifespans measured in decades. OEMs utilize a mixture of old and new technologies to meet their company

goals, with Per- and Polyfluoroalkyl Substances (PFAS) performing a variety of essential use functions to help achieve success. Some of these applications of PFAS in the heavy-duty, non-road equipment industry include, but are not limited to; coatings and sealings, hoses, hydraulic systems, and alternate power. It is crucial to understand, that without the functionality provided by certain PFAS chemicals, the introduction of future nonroad products able to meet air quality, climate, safety, durability, waste, sustainability, and alternative power goals will be impossible.

The equipment manufacturing industry design their products to operate with very long lifetimes, utilizing end-of-life design provisions to ensure waste products do not find their way into landfills, water bodies, or the atmosphere. Unlike many consumer applications, our equipment is designed to ensure products are responsibly remanufactured following their useful life, and that used oil and fluid wastes are properly captured and recycled. These widespread industry practices help promote circular economy principles and prevent releases of unwanted pollutants to the environment. AEM and its members unequivocally support intelligently designed laws and regulations that mitigate the hazards from high-risk sources of PFAS pollution, including spill prevention requirements, proper waste handling procedures, and requirements to prevent fugitive emissions and effluent discharges.

Equipment manufacturers recognize the importance of identifying and addressing the risks associated with heavy-duty, non-road equipment, whether from operator safety concerns, engine emissions, or chemical management issues. **AEM urges you to support of LD 987** and is committed to addressing these issues by serving as a catalyst for innovation and working to educate the public and policymakers on the proactive solutions equipment manufacturers are putting into place to protect public health and the environment.

We appreciate the opportunity to provide these comments and encourage you to contact us should you wish to discuss any part of this submission.

Sincerely,



Nicholas Rudowich
Director, State Affairs
Association of Equipment Manufacturers (AEM)

Cc: Members of the Joint Standing Committee on Environment and Natural Resources