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**Testimony of the Maine Organic Farmers and Gardeners Association  
in Opposition to  
LD 1903 - *An Act to Conform the State's Perfluoroalkyl and Polyfluoroalkyl  
Substances Laws to Federal Standards***

May 12, 2025

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Dear Senator Tepler, Representative Gramlich and members of the Environment and Natural Resources Committee,

On behalf of the Maine Organic Farmers and Gardeners Association (MOFGA), I am writing to express our strong opposition to LD 1903, which would weaken Maine's leadership on PFAS regulation by subordinating our state standards to federal ones.

A broad-based community, MOFGA is transforming our food system by supporting farmers, empowering people to feed their communities, and advocating for an organic future. MOFGA currently certifies 520 organic farms and processing operations representing more than \$120 million in sales. We're working hard to create opportunities for Maine's next generation of farmers. Each of these farmers is a Maine businessperson for whom economic health and environmental health are interdependent. While MOFGA envisions a future of healthy ecosystems, communities, people, and economies sustained by the practices of organic agriculture, we attribute our success to collaboration and outreach to growers across the management spectrum.

Maine has been at the forefront of addressing PFAS contamination – a crisis that has devastated numerous farm families across our state. Our members have witnessed firsthand the catastrophic impacts when PFAS contaminates agricultural land, destroying livelihoods built over generations and threatening public health. The current federal standards for PFAS are insufficient to protect Maine's farmers, water resources, and citizens.

This bill would effectively roll back Maine's more protective standards for drinking water, soil contamination, food packaging, surface water quality, and emissions. The EPA's recent drinking water standards, while a step forward, remain less comprehensive than Maine's existing protections. Particularly concerning is the preemption language regarding food packaging, which would strip Maine's authority to protect citizens from PFAS exposure through this significant pathway.

For Maine's organic farmers, who depend on clean soil and water, this legislation represents an existential threat. Many MOFGA members have already invested significantly in PFAS testing and remediation based on Maine's standards. Shifting these standards now creates regulatory uncertainty and undermines these investments in food safety.

Maine's unique hydrogeology, agricultural practices, and population distribution require Maine-specific solutions. The federal one-size-fits-all approach fails to account for Maine's particular vulnerabilities to PFAS contamination, especially in rural agricultural communities.

Rather than relinquishing Maine's regulatory authority to federal agencies that have historically moved too slowly on PFAS, we should be strengthening our state's capacity to protect its citizens. Federal standards should represent a floor, not a ceiling, for environmental and public health protections.



To speak briefly to the issue of regulation of pesticides due to intentionally or unintentionally added PFAS (as in the case of pesticides contaminated by their containers) it is important to note that no pesticides will be banned due to PFAS regulation until 2032. Loss of farm businesses in Maine is not due to pesticide regulation. Maine farmers face tremendous market pressure from rising costs and decreasing commodity prices.

Contamination of land and food is just one more pressure they must deal with. Receiving support from the PFAS Contamination Fund, receiving technical assistance to deal with contamination, and reducing the source of PFAS contamination through reduced use of PFAS in consumer and industrial products all serve to support farmers' efforts to produce healthy food.

MOFGA urges committee members to reject LD 1903 and instead support policies that maintain Maine's leadership in protecting its citizens from these dangerous "forever chemicals." The future of Maine's organic agriculture – and the health of our communities – depends on maintaining strong, science-based standards that truly protect our state's resources.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Heather Spalding". The signature is fluid and cursive, with a stylized flourish at the end.

Heather Spalding  
MOFGA Deputy Director