

Testimony of Gail L. Carlson, Ph.D.

In Opposition to
LD 1982 *An Act to Ensure Uniformity in the Regulation of PFAS*

Committee on Environment and Natural Resources
May 19, 2025

Senator Tepler, Representative Gramlich, and members of the Committee, thank you for reading my testimony. My name is Gail Carlson and I live in Waterville. I have degrees in chemistry and biochemistry, and I teach public health courses at Colby College. I conduct research on environmental contamination by PFAS in Maine.¹

I am in strong opposition to this proposed change in PFAS definition. This is nonsensical and would be a large step backward in Maine's attempts to regulate the various sources of PFAS that are contaminating our environment and people, often at very high and dangerous levels. Maine leads the nation in addressing the PFAS crisis in order to reduce human exposures and health effects, which, as you have no doubt heard in many public hearings this legislative session, includes several types of cancer, metabolic disorders, hormone disruption, reproductive problems, and suppression of the immune system, particularly in children, which leads to higher burdens of infectious diseases and inadequate responses to childhood vaccines.

We should stick to the chemical definition that has already been accepted in Maine, which is also the definition endorsed by many of the world's scientists.² Half of U.S. states use the definition Maine currently does, along with the Department of Defense and the OECD (Organisation for Economic Co-operation and Development), a "forum and knowledge hub for data, analysis and best practices in public policy."³ This definition (chemicals with at least one fully fluorinated carbon) is used in Maine's PFAS-in-products restriction, which is already having a positive effect as manufacturers are responding and finding ways to make products without PFAS.⁴

This unnecessary and unscientific proposal to redefine PFAS is an attempt to stall implementation of Maine's law, which is already underway, and create a new way to exempt certain fluorinated chemicals that should be restricted. These exemptions will raise the threat of continued PFAS exposure and harm in Mainers. For example, certain fluoropolymers (which are very hazardous and contribute significantly to environmental contamination), fluorinated pharmaceuticals (of which there are many), and fluorinated refrigerant chemicals could be exempted. Another possibly exempted chemical would be the most prevalent PFAS in the environment, trifluoroacetic acid (TFA), which is currently unregulated but will need to be in the near future because, even though it has been inadequately studied so far, it contaminates much of our surface water and drinking water, and is toxic to aquatic animals.⁵

The definition we use for PFAS should be as broad as possible so that our laws encompass as many of them as possible. Certain PFAS breakdown to other PFAS, some may be substituted for others, and as an entire family contribute to the massive environmental and health catastrophe we find ourselves in. It makes no sense to go backward and limit what can be regulated. This move to redefine PFAS is being pushed by the chemical industry, and we should reject it.

Please vote *ought not to pass* on LD 1982. Thank you.



¹ <https://doi.org/10.1016/j.envres.2025.121470>

² <https://www.saferstates.org/wp-content/uploads/Scientists-Statement-on-Defining-PFAS.pdf>

³ <https://www.oecd.org/en.html>

⁴ <https://www.manufacturingdive.com/news/manufacturers-prepare-for-maines-sweeping-pfas-restrictions/745460/>

⁵ <https://doi.org/10.1021/acs.est.4c06189>