

Jared Bornstein
Manufacturers of complex products
Support of LD 1214, with 2 modifications

Committee on Environment and Natural Resources
Testimony by Jared Bornstein on behalf of Complex Product Coalition
In support of LD 1214
April 26, 2023

Good morning, Senator Brenner, Representative Gramlich and esteemed members of the Environment and Natural Resources Committee. My name is Jared Bornstein and I am representing a coalition of manufacturers of complex products, in support of LD 1214, with 2 modifications allowing for more informed compliance with the proposed regulations. Our coalition members manufacture equipment and products assembling tens to hundreds of thousands of parts, components, and raw materials to provide, in many cases, critical services to society. Commercial and consumer products such as appliances, electronics, vehicles, vessels, refrigeration and heating and cooling systems must meet strict, uniform design standards due to performance, safety, and other considerations, including for replacement parts.

Manufacturers of Complex Products wish to note that they greatly appreciate the efforts of the Department of Environmental Protection to incorporate sensible consideration into their proposed rulemaking under the current statute. We support proposed modifications through LD 1214, in addition to more transparency, which will provide for a more targeted policy approach.

The modifications that Complex Products manufacturers support to improve the legislation are:

- First, to require the Department to establish a list of reportable PFAS chemicals that they want to control under the definition in the legislation, with their specific CAS numbers included. This is how manufacturers downstream identify and search for ingredients in

their products – by CAS number. These companies are not in the business of understanding or interpreting a complex chemistry definition. They make equipment, not chemicals. The Department has indicated already in guidance that they only expect reporting for chemicals with CAS numbers and having a list will improve the process.

- Second, we would like the legislation to specify that complex product manufacturers can notify their suppliers that their components are in products sold in Maine and have the supplier notify the Department directly on that basis. Again, we think this will make the program more efficient.

We appreciate your support for LD 1214 with these modifications. Thank you.