



April 30, 2021

Senate Chair Stacy Brenner
House Chair Ralph Tucker
Committee on Environment and Natural Resources
Maine House of Representatives
100 State House Station
Augusta, ME 04333

Dear Honorable Senate Chair Brenner and House Chair Tucker,

My name is Mark S. Rossi, PhD, Executive Director of Clean Production Action. Clean Production Action is a national, non-profit organization located in Somerville, Massachusetts. We are a solutions organization. Our tools and collaborations simplify the complexity of identifying safer alternatives to toxic chemicals. Businesses, environmental organizations, investors, and governments use our tools to make informed decisions when eliminating or advocating for the elimination of toxic chemicals.

For example, our tool, GreenScreen® for Safer Chemicals, is referenced in Maine, Department of Environmental Protection, Chapter 880: Regulation of Chemical Use in Children's Products, for the evaluation of "the human health and environmental hazard" posed by a priority chemical and each identified chemical alternative. Additionally Clean Production Action has certified through our GreenScreen Certified program over 230 PFAS-free and environmentally preferred products used in textile manufacturing and firefighting foam products.

Clean Production Action **supports LD 1505, An Act To Restrict the Use of Perfluoroalkyl and Polyfluoroalkyl Substances in Firefighting Foam**. As the Committee is well aware, and documented in "Managing PFAS in Maine, Final Report from the Maine PFAS Task Force" (January 2020), PFAS contamination of drinking water and the environment is common in Maine as well as across the United States, and firefighting foam is a major source of that contamination.

LD 1505 is a common sense approach to an urgent issue. As LD 1505 specifies, where not required by federal law or regulation, firefighting foam should be immediately (effective 1/1/2022) prohibited. PFAS-free and environmentally preferred firefighting foam products for Class B fires are on the market and in use across the United States. Class B fires are those fires whose fuel source is flammable liquids or flammable gases, petroleum greases, tars, oils, oil-based paints, solvents, lacquers, or alcohols.

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Through Clean Production Action's GreenScreen Certified program (<https://www.greenscreenchemicals.org/certified/fff-standard>), we have certified ten PFAS-free and environmentally preferred firefighting foam products and wetting agents for Class B fires from five manufacturers: Angus Fire Ltd., BIOEX, Fire Suppression Innovations, National Foam, and Verde Environmental. These products are in use by fire departments in the U.S. and the Minnesota Pollution Control Agency (MPCA) "has encouraged Class B firefighting foam manufacturers to certify their fluorine-free products with third-party environmental health and safety certifiers (e.g., GreenScreen)" (<https://www.pca.state.mn.us/sites/default/files/p-gen1-22.pdf>).

GreenScreen Certification requires manufacturers to disclose all intentionally added substances, and uses a combination of a restricted substances list (RSL), GreenScreen scores, and analytic testing for acute aquatic toxicity and total organic fluorine to certify firefighting foams that do not use PFAS and over 2,000 other chemicals of high concern. "PFAS-free" in GreenScreen Certified for Firefighting Foam means the product has zero intentionally added PFAS and any impurities of PFAS must be less than 0.0001% by mass (or 1 part per million) of total organic fluorine as determined by testing using combustion ion chromatography.

With PFAS-free and environmentally preferable alternatives already on the market, passing LD 1505 is a common sense approach to eliminating a major source of PFAS contamination and exposure in Maine.

Sincerely,



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