

March 18, 2024

The Honorable Stacy Brenner  
The Honorable Lori Gramlich  
c/o Legislative Information Office  
100 State House Station  
Augusta, ME 04333

*via electronic transmission*

**RE: Support of SP 796/LD 1960, An Act to Support Farming in Maine by Extending the Deadline for Manufacturers of Products Containing Perfluoroalkyl and Polyfluoroalkyl Substances to Report on Those Products**

Dear Chair Brenner, Chair Gramlich, and Members of the Joint Committee on Environment and Natural Resources:

On behalf of The Household and Commercial Products Association (HCPA), we respectfully submit the following comments regarding SP 796/LD 1960, which seeks to clarify product exemption in Public Law c. 477, An Act To Stop Perfluoroalkyl and Polyfluoroalkyl Substances Pollution (LD 1503, 130th Legislature).

HCPA members manufacture a variety of products including those for household cleaning, air care, aerosols, floor care, automotive maintenance and appearances, and household pesticides that include antimicrobial disinfectants and sanitizers. These products are essential tools for a wide variety of functions necessary to maintain clean and healthy homes and institutional facilities, such as hospitals and schools.

While HCPA supports sensible regulation on priority chemicals, we believe the overly broad definition of PFAS included in Public Law c. 477 captures products that are governed under other regulatory jurisdiction or are traditionally not considered PFAS-derived products in the marketplace. SP 796/LD 1960 would help correct this discrepancy by exempting products which should not be within scope of the broad PFAS program.

Specific to products governed under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), by exempting these products from the law, the state would avoid unintentionally inserting measures that may interfere with long-standing federal pesticide regulation. The proposal would also curtail redundancy with recently passed state measures directing the Maine Board of Pesticides to collect data on PFAS.

We do believe a small correction in the text under Section 1. 4. (D) would lead to greater clarification regarding product regulatory jurisdiction. **For this reason, HCPA respectfully requests the following edit on page 1 of the text:** *An agricultural product that is intended for use in crop production or crop protection, that is used in an agricultural setting [and or where application of the products is] regulated by or under the jurisdiction of...*

Overall, SP 796/LD 1960 will serve to clarify product scope in the law and avoid disruptions in the marketplace, therefore, we urge committee support of this bill. Thank you for the opportunity to provide input on behalf of HCPA. We would welcome the opportunity to be a collaborative partner with the bill author as well as the committee.

Respectfully Submitted,

*Michelle L. Kopa*

Michelle Lopez Kopa

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