

TESTIMONY on S.197. Feb. 2, 2024. Sylvia Knight, VT Pesticide & Poison Action Network. Sknightinvt73@gmail.com

Thank you for inviting me to testify. I will focus on Section 6, page 10, lines 6 & 7, regarding the words “Intentionally added.”

On the second page I want to respond to Chairman Starr’s question on Jan 31: “Where is all the PFAS coming from?”

It is crucial to keep the words, “Intentionally added” in this bill, to deny any attempts to remove this concept. PFAS are “intentionally added” to pesticides because they add properties that make the pesticide more lethal, more effective. Please see the chart below¹ to see why PFAS of various types are added to pesticides. These chemicals must be considered as highly active components of the pesticides to which they are added; they are NOT “inert”, or chemically inactive ingredients.

Please think with me about this aspect of unidentified ingredients in pesticides. VT Agency of Agriculture and the VT Dept of Health can get information about unidentified ingredients in pesticides, but they are not required, not allowed to share that information with us. Why not? It is considered “confidential business information”. How are we to make wise, informed decisions about what we use if important information about toxins in products is not disclosed to you or to us? Such secrecy protects only the manufacturers and their profits, while endangering life and health on the planet. Would you support disclosure of all ingredients?

Pesticides and PFAS: Glüge et al (2020) p.2366 | Environ. Sci.: Processes Impacts, 2020, 22, 2345–2373

USE CATEGORY/SUBCATEGORY	FUNCTION OF PFAS	PROPERTIES OF PFAS EMPLOYED
Insecticide against common housefly and carmine mite	Suffocation of the insect by the adsorbed fluorinated surfactant	?
Insecticide against ants and cockroaches	?	?
Formulation additives	Anti-foaming agent	Low surface tension
Formulation additives	Dispersant, facilitate the spreading of plant protection agents on insects and plant leaves	
Formulation additives	Dispersant, increase uptake by insects and plants	Low surface tension
Formulation additive	Wetting agent for leaves	Low surface tension
	the uses of per-and polyfluoroalkyl substances (PFAS)	Environ.Sci.: Processes Impacts. 2020. 22, 2345

¹

Re Chairman Starr's question: Where are all the PFAS coming from?

The Glüge article referenced above lists the industries using PFAS:

Aerospace; Biotechnology; Building and construction; Chemical industry, including pesticides; Electroless plating; Electro plating; Electronic industry; Energy sector; Food production industry; Machinery and equipment; Manufacture of metal products; Mining; Nuclear industry; Oil & gas industry; Pharmaceutical industry; Photographic industry; Production of plastic and rubber; Semiconductor industry; Textile production; Watch-making; Wood industry; Aerosol propellants; Air conditioning; Antifoaming agents; Ammunition; Apparel, Automative; Cleaning compositions; Coatings, paints and varnishes; Conservation of books and manuscripts; Cooking and bakeware; Electronic devices; Fire-fighting foam; Flame retardants; Floor covering including carpets; floor polish; Glass; Laboratory supplies; Lubricants & greases; Medical utensils; Paper and packaging; personal care products; refrigerant systems; Sealants and adhesives; soldering; soil remediation; wire and cable insulation, gaskets and hoses.

Others have addressed local sources of PFAS in our land and waters.

In closing, I urge you to keep S.197 intact, as is, and support its addition to S. 25. Let's get S.197 and S.25 passed this year! Young people are looking to you to protect life on Earth! Time to use the precautionary principle and protect future generations!