

Good afternoon,

We appreciate the committee's time and consideration on S.20. Included below is a follow-up message from Stewart Holm with the American Forest & Paper Association who was invited to testify before the committee last week.

Thank you for your time last week. In response to the latest draft of the bill, I wanted to share an additional comment. We have concerns with the "and are present in any amount" language impacting food packaging and PFAS. I find the "present in any amount" to be redundant and unnecessary for the requirement of a packaging product to have no intentionally added PFAS. The unintended consequences of this language is that it infers that a testing program is necessary and some approved analytical method would be required. At the present time there is not an approved analytical method from a government agency that we are aware of that measures PFAS in food packaging. As a result, "present in any amount" creates a consequential burden to the industry without an obvious solution.

We respectfully request that the phrase "and are present in any amount" be amended to "and are present above an incidental presence" in the bill. This is consistent with language in other states with similar legislation and serves the assumed purpose of the language with language that has a precedent in Vermont and elsewhere.

Thank you and we would be happy to answer any questions on this,
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