

**From:** Lauren Hierl, Executive Director, Vermont Conservation Voters  
**Subject:** PFAS definitions  
**Date:** March 11, 2021 at 12:05:16 PM EST  
**To:** Senate Committee on Health and Welfare

Here are the definitions of PFAS used by other states with similar legislation. You can see all the other states use the same definition:

**Maine - An Act To Protect the Environment and Public Health by Further Reducing Toxic Chemicals in Packaging**

[http://www.mainelegislature.org/legis/bills/display\\_ps.asp?ld=1433&PID=1456&snum=129](http://www.mainelegislature.org/legis/bills/display_ps.asp?ld=1433&PID=1456&snum=129)  
*"Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" means any member of the class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.*

**Washington State Legislation banning PFAS from food packaging:**

<https://apps.leg.wa.gov/rcw/default.aspx?cite=70A.222.010>  
*"Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS chemicals" means, for the purposes of food packaging, a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.*

**New York law banning PFAS in firefighting foam:**

<http://public.leginfo.state.ny.us/lawssrch.cgi?NVLWO>: (searchable site, if you type in PFAS and click on definitions it brings you here)  
*"Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS substances" shall mean, for the purposes of food packaging, a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.*

**Vermont's S.20 has a slightly different definition:**

*"Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" means a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom or a chemical compound meant to replace perfluoroalkyl and 7 polyfluoroalkyl substances that has similar chemical properties.*

For reference, Vermont's S.295 from last year had a definition consistent with each of these other states. Aligning our definition with NY, ME, WA might address concerns raised by industry groups. VCV would be comfortable with that change. We would be going back to the definition used in S.295 last year:

**Vermont's S.295 from last year -**

<https://legislature.vermont.gov/Documents/2020/Docs/BILLS/S-0295/S-0295%20As%20passed%20by%20the%20Senate%20Official.pdf>  
*Perfluoroalkyl and polyfluoroalkyl substances" or "PFAS" means a class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom.*

Thank you for your work on this important bill.

Sincerely,  
Lauren