*Friday, March 29, 2024*

**TESTIMONY TO HOUSE COMMITTEE ON HUMAN SERVICES ON S.25 & S.197**
***Marguerite Adelman, Coordinator, VT PFAS/Military Poisons Coalition***

Thank you for inviting me to testify on S.25 as well as S.197. As the Coordinator of the VT PFAS/Military Poisons Coalition, we are deeply concerned about PFAS in makeup, menstrual and personal hygiene products, textiles, ski wax, and astro turf. In fact, we are concerned about PFAS in everything not included in Act 36 (S.20) and S.25. Our coalition is made up of individuals and groups across Vermont who see PFAS connections to a wide variety of health and environmental issues. We are all volunteers and are beholden to no one.

Today is the United Nation's World Water Day. Safe water to drink, like clean air to breathe, is a human right. PFAS is not just a Vermont problem, it's a worldwide concern since PFAS travels freely through water and air that have no state or country boundaries.

In the past, I worked as the public information director for the Cook County Dept of Public Health in Illinois. I understand the effort it takes to educate the public about a complex subject like PFAS. A major goal of our coalition is education. The truth is that the Vermont public is suffering from contamination without their consent. In fact, they don't even know they are being poisoned….because 75 to 80% don't know what PFAS is, according to a Texas A7M study. As legislators, you have an advantage; you get to learn about the dangers of these toxins as a part of your work.

Over the past few days, you've heard about PFAS and its harmful effects on health….that PFAS lasts in the environment for hundreds and thousands of years….that we cannot destroy PFAS….that it bioaccumulates in living beings…. that PFAS has been around since the 1940s….and that the European Union is setting the gold standard for regulating PFAS. In fact, the ECHA proposal to ban 10,000 forms of PFAS is alive and well, currently undergoing an assessment of the

many comments that they have received from around the world. Here's what you may not have heard….that the chemical companies have known about and hid the dangers of PFAS as early as the 1960s.

A recent analysis by Food and Water Watch, found that the US chemical industry has spent over $110 million during just the last two election cycles, deploying lobbyists to kill dozens of pieces of PFAS legislation, slow administrative regulation of PFAS by lengthening timelines, and dilute or gut PFAS legislation by narrowing definitions. The industry's onslaught was effective at both the national and the state level.

I want to focus on what PFAS costs the state, our communities, and individuals in multiple areas: personal health, healthcare, remediation, testing, etc. I know that Vermont is worried about its budget and spending. However, strong regulations on PFAS now will save the state money in the short term and in the long run.

A Minnesota 2023 report noted that PFAS can be bought for $50 to $1,000 per pound. However, it costs between $2.7 million to $18 million per pound to remove PFAS from municipal wastewater, depending on facility size. Consider that there are over 200 contaminated sites or industries that utilize and discharge PFAS in Vermont. Global Foundries in Essex Junction alone released 486 lbs. in 2023 into the Winooski River. Cleaning up these 486 lbs. for just one year could cost in the billions.

Removing it from U.S. drinking water supplies could add more than $3.2 to $7 billion annually to the bill, according to a report commissioned by the American Water Works Association. Cleaning up PFAS waste at U.S. military sites could cost $31 billion.

99% of Americans already have PFAS in their blood. PFAS chemicals function as endocrine disruptors, resulting in birth defects and chronic diseases, including breast cancer, endocrine disorders, metabolic disorders, kidney cancer, testicular cancer, liver disease, reproductive disorders and infertility, thyroid disorders, high cholesterol, and ulcerative colitis. A compilation of toxicity studies shows that

virtually every PFAS examined is correlated with these adverse health outcomes. The CDC has just recommended that people discuss getting blood tests for PFAS with their doctors.

One recent study estimated that the annual health-related costs of PFAS to be anywhere between $5.5 billion and $63 billion. And according to the EPA, the long-term health benefits from decreased PFAS exposure through regulation could eventually save the U.S. an estimated $908 million to $1.2 billion annually.

The price we have already paid and the increased costs to come if we don't ban PFAS are staggering. We are left to decide what to do with PFAS hotspots, test our wells and public water systems for PFAS, purchase home remediation systems, upgrade our wastewater treatment facilities to filter out PFAS, deal with the devaluation of properties and businesses and contaminated farms, and so much more. The economic burden of meeting the EPA's proposed Maximum Contaminant Limits in drinking water will fall onto public utilities that may incur debt — and ultimately onto households in the form of higher rates. These PFAS-related expenses are substantial costs for any community but especially for low-income and small rural communities:

Obviously, our coalition supports S.25 and S.197. We have a list of things we want you to do:

- Keep the broadest possible definition of PFAS.
- Expand the number of banned chemicals in makeup, menstrual products, and personal hygiene products.  (people can still order online from out of state)
- Don't add on years to comply with timelines in order to accommodate industry. Innovation is driven by timelines. Furthermore, safer alternatives are actually available for most uses of PFAS. ChemSec has a tool to search for PFAS alternatives depending on the use for the PFAS. They even have an alternative for semi-conductors….one of the biggest and expanding uses for PFAS.

- Don’t forget PFAS in donated items at thrift stores like Goodwill, Resource, and Habitat for Humanity. Many lower income individuals, as well as those who recycle and reuse, shop at these stores.
- Ban PFAS added to pesticides. Tests demonstrate that PFAS is added to pesticides and is not just in the containers. We don’t need double the poison in our food.
- Test private wells in Vermont for PFAS. Four in 10 Vermont households use a well or spring water.
- Conduct far more testing in Vermont of our lakes and rivers, as well as our fish and wildlife.
- Legislate that containers and packaging for all products, including for pesticides, be PFAS free.
- Educate the public about PFAS, how to reduce their risk from PFAS, and how to find PFAS free products.
- Stop schools, municipalities, and state government from purchasing products that contain PFAS.
- Realize that the simplest and best solution is what the EU is proposing. Ban the entire class of PFAS chemicals and do it soon. Otherwise you will be working on piecemeal legislation forever, banning new forms of PFAs and new products that contain it.

Remember: Currently, PFAS cannot be destroyed….it can only be contained. PFAS is cheap to buy by the pound, but costs an absolute fortune now and in the decades and centuries to come. Consider all the other costs, both personal and in tax dollars to our health, health care, testing, and remediation of soil, water, and air. There is no doubt in my mind that the costs to us as individuals and government far outweigh the benefits. Please pass S.25 and S.197 by strengthening this legislation and not weakening it in any way.

International Resources:

**IPEN** (the International Pollutants Elimination Network) is a global network of public interest organizations improving chemical policies and raising public awareness to ensure that hazardous substances are no longer produced, used, or disposed of in ways that harm human health and the environment. IPEN has put together a report on the Global PFAS Problem and Fluorine Free Alternative Solutions (https://ipen.org/documents/global-pfas-problem-fluorine-free-alternatives-solutions )

**ChemSec** (https://chemsec.org), the International Chemical Secretariat, is an independent non-profit organization that advocates substitution of toxic chemicals with safer alternatives. Chemsec hosts a marketplace database that gathers all green chemistry innovations in one place, making it easier for companies to choose safer solutions.

Other International Resources for PFAS Research and Alternatives:

- **https://www.edc-free-europe.org/**
- **https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/countryinformation/**
- **https://echa.europa.eu.** ECHA's proposal to ban 10,000 forms of PFAS is still active and in further study. Groups are meeting from March 23 to September to finalize parts of the proposal.

Articles of interest about costs:

- https://www.pca.state.mn.us/news-and-stories/groundbreaking-study-shows-unaffordable-costs-of-pfas-cleanup-from-wastewater/
- https://www.theguardian.com/environment/2023/may/12/pfas-forever-chemicals-societal-cost-new-report
- https://www.foodandwaterwatch.org/2023/11/07/new-report-pfas-industry-spent-more-than-110-million-on-lobbying-since-2019/
- https://www.militarypoisons.org/s/PFAS-Presentation-for-WILPF-EWG.pptx

- https://www.militarypoisons.org/s/PFAS-Presentation-for-Vermont.pptx