

Friday, February 2, 2024

Senate Agriculture Committee Testimony on S.197, Sections 6 and 7
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Thank you for inviting me to testify on S.197, Sections 6 and 7. As the Coordinator of the VT PFAS/Military Poisons Coalition and a member of the VT Pesticide and Poison Action Network, I am deeply concerned about PFAS in pesticides, as both inert and active ingredients. Our coalition supports sections 6 and 7 of S.197. We do not need PFAS in pesticides for many reasons.

First, PFAS was in far fewer pesticides before 2000. Fluorinated pesticides accounted for only 9% of pesticides on the market in the year 2000. In the following 20 years, and especially the last 10 years, PFAS in pesticides increased significantly. Between 2015-2020, over 70% of new pesticide products approved had PFAS added. In general, fluorinated pesticides and their byproducts break down much more slowly in the environment than previous PFAS free formulations. We did without PFAS in pesticides in the past. We can do without them again.

Second, we are talking about a lot of different PFAS chemicals, many of which have not been properly vetted. A study of pesticides in Maine determined that 55 PFAS-related chemicals were found in over 1,400 pesticides. None of the PFAS identified in the 1,400 pesticides were among the PFAS recently removed by the EPA. This increasing trend to add an additional poison to pesticides that are already considered poisons is insane. We don't need to double the poison.

Third, PFAS is showing up in our food and the use of pesticides with PFAS is largely to blame. European Union scientists are documenting that fruits contain elevated levels of PFAS. Strawberries, spinach, kale, collard, mustard greens, peaches, pears, nectarines, apples, grapes, peppers, cherries, blueberries, and green beans all are testing positive for PFAS. In a new study, PFAS from pesticides has been found in breads and cereals, pasta and pasta products, flour, and rice (https://www.researchgate.net/publication/360778417_Assessment_of_Bioactive_S

[urfactant Levels in Selected Cereal Products](#)). Given the new EPA Health Advisory levels on PFAS and the fact that people ingest PFAS in water, breathe it in the air and the dust in their homes, and are exposed to it in the products that they buy and use, the addition of PFAS to pesticides is only adding to human exposure.

Fourth, in recent news, the Centers for Disease Control (CDC) is encouraging physicians and healthcare providers to consider blood testing for PFAS exposure with their patients (<https://www.abc27.com/local-news/cdc-encourages-doctors-to-consider-blood-testing-for-pfas/>). 99% of Americans already have PFAS in their blood. Remember that PFAS bioaccumulates in living things, causing a plethora of health problems, including higher cholesterol, infertility, diminished immune systems, lower birth weights, kidney and testicular cancers, and elevated liver enzymes. Those in professions that use PFAS are at the greatest risk, including farmers and farm workers.

Fifth, Minnesota and Maine have already passed laws banning PFAS in pesticides. Other states are considering similar legislation.

I've heard those in Vermont's Agency of Natural Resources and the Agency of Agriculture say that they need to do more research on the potential effects of removing PFAS from pesticides. I don't think that Vermont always needs to do its own research or form a commission. It seems to me that these are delay tactics. Why can't we rely on national and international research? Certainly, there are experts outside of Vermont who have research that they can share with us.

Legislation — and the anticipation of regulation — is key to driving innovation for safer alternatives to PFAS. Even the “difficult” uses of PFAS have promising alternatives. Plus, the transition periods in restrictive legislation give us time to find alternatives.

Safer alternatives are actually available for most uses of PFAS. Well-established alternatives have, for example, existed for textiles and refrigerants for quite some time already. And innovation in this arena is in full swing with alternatives

continuously improving. For example, alternatives to PFAS in semiconductor manufacturing have been developed lately.

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.

PFAS are invisible chemicals that have infiltrated our environment, seeping into our drinking water, contaminating our food, and making their way into our own bodies. In many cases, the PFAS levels are high enough to cause environmental and human health problems.

What makes matters even worse is that their persistence means that these “forever chemicals” don’t break down, fueling a never-ending rise in PFAS levels as long as we keep producing and using them. We don’t need PFAS in pesticides.

Finally, consider the costs in health care, testing, and remediation. There is no doubt in my mind that the costs to us as individuals and governments far outweigh the benefits. Chemical companies have deceived us for years about the dangers of these chemicals. It is not the job of our legislators to protect the chemical industry. It is the job of government and our legislators to protect people and living things...to protect our planet, as well as future generations. Let’s get rid of PFAS in pesticides with S.197.

International Resources for PFAS Research and Alternatives:

- ▶ <https://chemsec.org>
- ▶ <https://www.edc-free-europe.org/>
- ▶ <https://ipen.org>
- ▶ <https://echa.europa.eu>
- ▶ <https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/countryinformation/>