



March 10, 2025

Representative Amy Sheldon
House Committee on Environment
115 State Street
Montpelier, VT 05633-5301

Subject: Exempt life jackets and marine textiles from H. 238

The National Marine Manufacturers Association (NMMA) is the premier trade association for the U.S. recreational boating industry, representing nearly 1,300 marine businesses, including manufacturers of recreational boats, marine engines, and accessories. Many of our members are small, U.S.-based, family-owned businesses. Together, they produce more than 85% of the marine products sold in the U.S. The recreational boating industry contributes \$230 billion to the national economy and supports over 812,000 American jobs across 36,000 businesses nationwide.

WSIA is the towed watersports industry's leading advocate, working to strengthen, grow boating and protect the interests of its member companies and recreational boaters across the country. The WSIA develops best practices, maintains waterway access rights, educates participants, and promotes safety on the water, including when participating in towed watersports. WSIA represents over 440 member companies, including boat, marine engine, and accessory manufacturers, as well as marine dealers.

MRAA is the leading trade association of North American small businesses that sell and service new and used recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations and conducts advocacy efforts on their behalf.

Boating is a significant economic driver in Vermont, generating \$426.4 million annually and supporting over 1,980 jobs and 90 businesses.¹ Our members, many of whom are small businesses, face unique challenges in complying with PFAS requirements in Vermont. While we all share the common goal of protecting the environment and human safety, it is crucial that regulatory efforts balance these objectives with the economic realities of our industry.

We propose the following recommended changes to H. 238:

Exempt Life Saving Devices from the Requirements of H. 238

Life jackets, also referred to as personal flotation devices (PFDs), throwable boat cushions, and boating survival gear are mandated by the United States Coast Guard and the International Maritime Organization (IMO) to meet certain performance requirements under harsh conditions. They are indispensable safety equipment that provide critical protection during boating emergencies. These products have a very long useful life and must remain intact and functional under robust conditions. The U.S. Coast Guard has statutory authority under Title 46, U.S. Code, Sections 3306(a) and (b), 4102(b), 4302(a) and (c), and

¹ <https://www.nmma.org/statistics/publications/economic-impact-infographics>

4502(a) and (c)(2)(B), to prescribe regulations for the design, construction, performance, testing, carriage, use, and inspection of lifesaving equipment on commercial and recreational vessels.

The use of PFAS in life jackets enhances water resistance, durability, buoyancy, and comfort—features that are essential to ensuring their effectiveness in life-saving situations. Currently, there are no alternatives that provide the same level of performance in these applications. Removing PFAS could compromise the safety and functionality of life jackets, putting users, especially children and inexperienced boaters, at risk. The boating industry is committed to exploring safer alternatives to PFAS, but it is essential that any transition prioritizes the high safety standards that life jackets are built to meet. Rather than focusing on PFAS regulation in life jackets, efforts should support the development of viable alternatives that do not compromise safety.

Exempt Marine Textiles from the Requirements of H. 238

We also request an exemption for marine textiles from the PFAS requirements in Vermont House Bill 238. Marine textiles, such as those used in sails, ropes, life-saving gear, and protective equipment, are exposed to extreme environmental conditions, including saltwater, UV rays, and fluctuating temperatures. PFAS treatments are essential to maintaining the durability, water resistance, and fire resistance of these materials, which are critical for ensuring safety in maritime environments. These treatments help extend the lifespan of textiles and prevent degradation, ensuring they remain reliable and effective in emergency situations. Currently, no suitable alternatives provide the same level of performance in these extreme conditions. Until suitable alternatives are developed, it is crucial to exempt marine textiles from these requirements to ensure the continued safety of those relying on this equipment.

In conclusion, we encourage the Vermont Legislature to collaborate with marine businesses to develop a practical and achievable process for maintaining essential safety features in watercraft and Personal Flotation Devices. Through this partnership, we believe the state of Vermont and the marine industry can create a balanced solution that safeguards both the environment and recreational boaters while also supporting the long-term economic sustainability of Vermont's marine sector.

We appreciate your consideration of these recommended changes to H. 238 and look forward to the opportunity to work together in implementing them. Please reach out to Sromano@nmma.org with any questions or for further information.

Sincerely,

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