The below organizations write in support of AB 2247, a bill that will require manufacturers of products or substances sold in, or imported into, the state to report the presence of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in those products or substances. The reports shall be registered on a publicly accessible platform created by the Interstate Chemicals Clearinghouse, of which California is already a member.

Our diverse organizations share an increasing concern about the vast use of PFAS chemicals, which build up in our bodies, don’t break down easily or break down into other PFAS and are now a ubiquitous presence in nature. PFAS are found across the United States and throughout California. As of August of 2021, PFAS pollution was detected in nearly 3,000 public and private water systems in 50 states and two territories. In California, a recent evaluation of PFAS in 248 water systems’ water found the chemicals in the water of 65 percent of those systems. More than 16 million people are served by these 161 systems. An ongoing investigation by the State Water Board is evaluating sources of PFAS in wastewater and biosolids, and additional tools are being developed to help local wastewater agencies to identify and trace sources of PFAS contamination throughout the sewershed.

PFAS are among the most persistent toxic compounds in existence, contaminating everything from drinking water to food and, because of their grease and water proof qualities are used widely in consumer products, such as food packaging, personal care products, and textiles, as well as industrial products and processes. They are found in the blood of virtually everyone on earth, including newborn babies. Very low doses of PFAS chemicals in drinking water have been linked to suppression of the immune system, interference with vaccines, and are associated with an elevated risk of cancer, increased cholesterol, and reproductive and developmental harms, among other serious health concerns.

While we know that some products contain PFAS, we don’t know how PFAS is being used throughout the marketplace or in industrial processes. Such knowledge is key to ensuring that our state and local regulators can manage PFAS pollution, implement meaningful source control, and ensure that the public isn’t unnecessarily exposed to the chemicals.

In the future, pollution prevention will be a key strategy for managing PFAS. As wastewater operators look to proactively implement source control programs to protect public health, we
need information about the sources of PFAS in commerce to support efforts to reduce inputs to the watershed. Solely relying on treatment technologies to remove PFAS is costly and does not destroy the PFAS compounds, but rather ultimately results in the disposition of PFAS to another waste stream. For this reason, pollution prevention is the most cost effective and meaningful PFAS management approach.

Therefore, it is critical for the state and the public to understand how PFAS chemicals are used and how much of the chemicals are imported into California. AB 2247 will ensure that manufacturers have to report their PFAS use to the state, and the bill will create a modest, but straightforward, method for the state to manage this information. This is a key first step to understanding and ultimately managing PFAS contamination in California.

Thank you, again, for considering our support for this bill. We look forward to working with you and the committee to better understand PFAS contamination in California.

Sincerely,

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