February 13, 2023
RE: HF 1000 - **OPPOSE**

Dear Chair Hansen, Vice Chair Jordan and members of the Environment and Natural Resources Finance and Policy Committee,

The undersigned organizations must respectfully take an OPPOSE position on HF 1000, legislation that would impose broad reporting requirements on manufacturers of all products containing PFAS sold in Minnesota, ban the sale of products containing PFAS in a variety of product categories and establish a future regulatory scheme to ban additional product categories containing PFAS.

This legislation is overly broad, lacks scientific basis and will have significant unintended consequences and could eventually ban thousands of products from sale and transport of those products into Minnesota. It would be one of the broadest bans on products containing PFAS in the nation and would have far reaching negative consequences on nearly every sector of the economy including aerospace, autos, powersports, alternative energy, healthcare, building and construction, electronics, pharmaceuticals, and agriculture.

PFAS are a diverse universe of chemistries that enable a huge range of products and sectors – everything from electronics, semiconductors, automotive, aerospace, and alternative energy. **However, all PFAS are not the same**. It is neither scientifically accurate nor appropriate to group all PFAS together. This broad universe of chemistries includes liquids, gasses, and solids.

There has been a lot of work done to assess individual PFAS compounds and to look at appropriate sub-groupings within this broad universe. Grouping these substances together is also inconsistent with the views of key policy organizations including the National Academies of Science, Engineering, and Medicine (NASEM), the Environmental Council of the States (ECOS), and various states that have looked at this specifically.

Today's PFAS are essential to modern life and an important enabling technology. These chemistries provide products with strength, durability, stability, and resilience. **These properties are critical to the reliability and safe function of a broad range of products that are important for industry and consumers.** They play a vital role in everything from designing automobiles with low emissions and improved safety, reliability, and fuel efficiency to manufacturing semiconductors, solar panel and high-performance electronics. Multiple industries depend on high-performance PFAS including aerospace, autos, powersports, alternative energy (solar, wind), healthcare, building and construction, electronics, chemicals and pharmaceuticals, oil and gas, and outdoor apparel and equipment, among other industries.

In this regard, the legislation would undermine effective product design, and in some cases, even overall product safety and efficacy for a broad range of products - including applications that are important for public safety and public health. One critical example and timely example, this bill would currently restrict critical materials that are essential to the COVID vaccine distribution and COVID testing, as well as the medical equipment used by healthcare providers that are on the front-line of fighting the COVID pandemic. This may not be the intent of the legislation, but this is the reality.

This bill also would adversely impact critical uses of this technology that are important for our society's broader sustainability objectives, including support for alternative energy and greenhouse gas reduction efforts. For example, lithium-ion electric vehicle batteries contain innovative fluorotechnology and are a critical product to Minnesota.

This legislation would have a significant impact on Minnesota in terms of the availability of critical products that are approved and used elsewhere. It would also foster an unworkable patchwork of state regulation with significant implications for Minnesota citizens, businesses and public entities, effectively isolating Minnesota from the rest of the country.

For these reasons, we must respectfully oppose HF 1000. Thank you in advance for considering our views. Should you have any questions, please contact Marcus Branstad at marcus_branstad@americanchemistry.com.

Sincerely,

American Chemistry Council

ACC Spray Foam Coalition

Alliance for Automotive Innovation

American Coatings Association

American Fuel and Petrochemical Manufacturers (AFPM)

AGC Chemicals Americas, INC

Animal Health Institute (AHI)

Association of Equipment Manufacturers (AEM)

Association of Home Appliance Manufacturers (AHAM)

BASF

Carlisle Spray Foam Insulation

The Chemours Company

Creative Polymer Solutions

CropLife America

Communications Cable & Connectivity Association (CCCA)

Consumer Healthcare Products Association (CHPA)

Consumer Technology Association (CTA)

Covestro

Daikin America, Inc.

Dupont

Flexible Packaging Association

Fluid Sealing Association (FSA)

General Coatings Manufacturing Corp

Gujrat Fluorochemicals

Honeywell

Household & Commercial Products Association (HCPA)

Huntsman

Hydraulic Institute

ICP Group

IDI Distributors

ITI

Johns Manville

Juvenile Products Manufacturers Association (JMPA)

Millipore Sigma

Motorcycle Industry Council (MIC)

National Association of Chemical Distributors (NACD)

National Council of Textile Organizations (NCTO)

National Electrical Manufacturers Association (NEMA)

National Marine Manufacturers Association (NMMA)

Natural Polymers, LLC

NCFI Polyurethanes

Outdoor Power Equipment Institute (OPEI)

Pine Chemicals Association International (PCA)

Plastics Industry Association

Printing United Alliance

Recreational Off-Highway Vehicle Association (ROHVA)

Responsible Industry for a Sound Environment (RISE)

Rhino Linings

Specialty Vehicle Institute of America (SVIA)

Solvay

Sustainable PFAS Action Network (SPAN)

SWD Urethane

The Toy Association