

February 2, 2023

Senator Brian J. Feldman
Chair, Senate Education, Energy &
Environment Committee
2 West
Miller Senate Office Building
Annapolis, MD 21401

Senator Cheryl C. Kagan
Vice Chair, Senate Education, Energy &
Environment Committee
2 West
Miller Senate Office Building
Annapolis, MD 21401

Dear Chair Feldman and Vice Chair Kagan:

On behalf of the Animal Health Institute (AHI), we respectfully oppose SB 158 related to the registration of pesticides in the state and new PFAS testing requirements, unless amended to exempt animal products approved and regulated by the U.S. Environmental Protection Agency (EPA).

The Animal Health Institute (AHI) is the national trade association representing the companies that make the animal medicines, vaccines and parasiticides, including flea and tick products, that keep animals and humans healthy.

While we believe the intent of the bill is to address mosquito pesticides that are a mass application, the bill language does not take into consideration the individually applied products, like those for companion or food animals. The PFAS in these important products are the actual active ingredient that are regulated by EPA and have gone through rigorous testing and analysis as a condition of approval for use. These products would likely be banned if subjected to these PFAS tests outlined in the bill, despite the rigorous EPA analysis that shows them to be effective and suitable for their intended use.

Many households rely on these affordable products to keep pets free from disease and, in some cases, these illnesses are zoonotic, or able to infect humans. These products allow pet owners to live in close proximity with their pets without fear of pest infestation or illnesses. Placing unnecessary requirements on these products would ultimately make it difficult for animal health companies to provide access to these products to veterinarians, food producers and pet owners which in turn would be detrimental to the health of Maryland residents and pets.

For these reasons, we ask that animal health products approved by the EPA not be subject to the requirements of this bill and offer this possible exemption language:

Pesticide products used to treat, or administered to, animals, approved and regulated under the United States Environmental Protection Agency under the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 et seq.).

This bill may lead to a situation where Maryland residents do not have access to safe and effective flea and tick medicines for their pets. These animal health products are fully regulated by the EPA, including in the area of PFAS, and new state requirements, such as those proposed here, would impede delivering these essential products.

We urge you to oppose SB 158 unless amended with exemption language for animal health products. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ginny Siller".

Ginny S. Siller
Director, Government Affairs