



**Senate Education, Energy & the Environment (EEE) Committee
Senate Bill 158 / House Bill 319:
Pesticide Registration - PFAS Testing – Requirements**

Position: OPPOSE

February 2nd, 2023

Dear Chairman Feldman and the Members of the Senate EEE Committee:

On behalf of the Mid-Atlantic Field Manager Association (MASFMA) (*formerly known as MASTMA*) and the Maryland Turfgrass Council (MTC), we write this letter in opposition to Senate Bill 158/HB 319, entitled: Pesticide Registration – PFAS Testing – Requirements.

As written, SB158/HB319, prohibits the Secretary of Agriculture from registering a pesticide for use against mosquitoes in the State unless the distributor of the pesticide submits to the Department test results indicating the pesticide has passed the PFAS test and an affidavit attesting to the legitimacy of the PFAS test results beginning next January. By 2026, the bill would expand its prohibitions on pesticides for any/all use in the State of Maryland, unless PFAS test results and a certain affidavit are submitted by the distributor.

The Mid-Atlantic Sports Field Manager Association (MASFMA) is a non-profit organization that is composed of sports turf field managers and workers from Maryland, Delaware, Washington D.C., and Northern Virginia. As MASFMA members, we partner together to promote education, teamwork, networking, and best practices among our peers and within the Sports Turf Management Industry.

We have partnered with Maryland Turfgrass Council (MTC) this year to bring a more unified front from all aspects of our industry. MTC, a non-profit organization, represents all areas of the turf industry including golf, sports-turf, sod producers, landscape, lawncare and commercial vendors and suppliers.

At the present time, **there is no single test method that is developed and proven to work in identifying PFAS in pesticide formulations.** As a result, should this bill become law, it would require multiple testing methods to be developed and then somehow validated.

Pesticides with chlorinated solvents need to be in fluorinated packages because the solvents can weaken the packaging. But the ultimate issue is, *“How do we effectively test to see if the pesticides contain PFAS if we have no actual means for analysis?”*

This bill could ultimately end up impacting IPM programs at schools, hospitals (with disinfectants) etc. and could actually end up affecting food issues related to packaging. Overall, this legislation would affect every aspect of life in the State of Maryland.

Simply put, there are no validated tests and therefore it is virtually impossible for the registrant to provide a "validated" affidavit.

This bill is far reaching in what it will do. Moreover, this legislation fails to provide a means of assisting companies that use PFAs. The economic impact on our industry could be substantial if there is no plan in place or products in place that could replace them in a timely manner.

In our opinion, we believe until there is an accurate way to test for PFAS, the Maryland General Assembly should, indefinitely, abstain from passing any such legislation. However, should the legislature wish to further examine this issue, we would like to extend our expertise in helping to find a reasonable and equitable solution.

It is for these reasons; we respectfully request this committee to provide an **UNFAVORABLE** report on SB158/ HB 319.

Should you have any questions or concerns, please don't hesitate to contact our organizations at any time.

Sincerely,

Robert Navolis

Rob Navolis
Mid-Atlantic Sports Field Managers Assoc.
(MASFMA)

Patrick Coakley

Patrick Coakley, Vice President
Maryland Turfgrass Council (MTC)