

Glenn Family Farm
Scott and Barb Glenn
12940 Clarksville Pike, Highland, MD 20777
Glennbarb6@gmail.com, Home 301-854-3299

February 19, 2023

RE: Opposition to HB0319 Pesticide Registration - PFAS Testing - Requirements

**Chairperson Delegate Joseline A. Pena-Melnyk,
Vice Chair Delegate Ariana B. Kelly,
Howard County Delegates Guzzone and Hill,
Other Members of the Health and Government Operations (HOG)
Committee,**

Thank you for the opportunity to provide comments on HB0319. We live on a small farm in Highland, Maryland, Howard County, where our three children were ten-year 4-Hers, managing and working with livestock, including beef and dairy cattle, sheep, and horses. We both have Ph.D.'s in agricultural sciences and worked for over 40 years in research, teaching, and federal and state government affairs. We have scientific and policy expertise in crop protection (pesticides), agronomy, animal science, food systems, conservation, environment, and more. We are 25-year members of Howard County Farm Bureau and Maryland Farm Bureau.

Overall Comment of Opposition

We oppose HB0319 for three reasons:

1) currently, there are no validated PFAS tests available for accurately testing pesticides;

2) the bill allows for the use of drinking water tests but these tests are inaccurate when used on pesticides and generate many false positives and negatives; and

3) the bill provisions are not science-based in either intent or content. Maryland Department of Agriculture (MDA), which has state authority for registration of pesticides, is a co-regulator with the U.S. Environmental Protection Agency, and as such complies with federal law, the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and federal as well as state regulations. Currently, U.S. EPA does not require a test for PFAS for any pesticide under consideration for registration nor for pesticides already

registered. MDA should not consider requiring these tests without definitive scientific research.

Justification for Opposition

- 1) Pesticides are critical for protecting public health and food security of all Marylanders and all Americans in the United States. Registered pesticides used according to label, alleviate human diseases, and contribute to enhanced environment and ample climate resiliency in both urban and rural communities, fields, and farms. Indeed, pesticides assure that we are protected from diseases such as those transmitted by mosquitoes and other insects, as well as for optimal crop and livestock productivity, thus assuring availability of safe, nutritious, and healthy food products.
- 2) Agriculture relies on pesticides just as we rely on other inputs, such as fertilizer and fuel. Pesticides used to control weeds, insects, and diseases by farmers work in concert for sustainable agriculture including conservation practices, animal health practices, and newer climate-smart agriculture practices. Farmers in Maryland use registered pesticides for crop production and for livestock production. Farmers apply registered pesticides according to the label. The label is the law!
- 3) Based on current research, it is not feasible to test for PFAS in pesticides. There are no scientifically validated methods to test for PFAS in pesticides. Using a drinking water test is not scientifically valid, results in erroneous data, and results in false positives and false negatives.
- 4) Thus, accurate testing for PFAS in pesticides is not possible. The bill creates an unattainable requirement and therefore a massive burden on MDA, farmers, the pesticide industry, and the general public. Requiring such a test would bring pesticide registration to a standstill and negatively impact the availability, use and benefits of pesticides. In this regard, HB 0319 does a disservice to all Marylanders and specifically Maryland farmers.

Therefore, we oppose HB 0319 and strongly urge that this bill not advance out of Committee.

We grant that PFAS requires attention by the U. S. EPA, U.S. Department of Agriculture, and MDA. More scientific research is needed. Rigorous research must continue to provide information about the possible risks to the food supply and to public health. A focus of current research is validating methodologies for accurate testing.

Background on PFAS from U. S. EPA

PFAS category of chemicals are known as the “forever chemicals.”

- PFAS are widely used, long lasting chemicals, components of which break down very slowly over time.
- Because of their widespread use and their persistence in the environment, many PFAS are found in the blood of people and animals all over the world and are present at low levels in a variety of food products and in the environment.
- PFAS are found in water, air, fish, and soil at locations across the nation and the globe.
- Scientific studies have shown that exposure to some PFAS in the environment may be linked to harmful health effects in humans and animals.
- There are thousands of PFAS chemicals, and they are found in many different consumer, commercial, and industrial products. This makes it challenging to study and assess the potential human health and environmental risks.

See <https://www.epa.gov/pfas/pfas-explained> for a complete explanation.

What we don't fully understand today

EPA's researchers and partners across the country are working hard to answer critical questions about PFAS:

- **How to better and more efficiently detect and measure PFAS** in our air, water, soil, and fish and wildlife.
- How much people are exposed to PFAS.
- How harmful PFAS are to people and the environment.
- How to remove PFAS from drinking water
- How to manage and dispose of PFAS.

See <https://www.epa.gov/pfas/pfas-explained> for a complete explanation.

PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024

See <https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024>

One strategic pillar of The Roadmap is:

- Ensure Science-Based Decision-Making
 - EPA will invest in scientific research to fill gaps in understanding of PFAS, to identify which additional PFAS may pose human health and ecological risks at which exposure levels, and to **develop methods to test, measure, remove, and destroy them.**

From the active research and risk assessment by U. S. EPA and other federal agencies, we are confident that MDA as a state co-regulatory partner, will stay abreast of the most recent validated information on PFAS.

Conclusion

In conclusion, we oppose HB 0319 and strongly urge that this bill does not advance out of the Health, Operations and Government Committee.

Thank you for accepting our comments (we missed the deadline). Please let us know if we can be of assistance to you on this matter (glennbarb6@gmail.com).

Sincerely,

Drs. Scott and Barb Glenn

Glenn Family Farm