



House Health and Government Operations Committee  
March 27, 2025  
House Bill 1208 – *Public Health – Prohibited Ingredients in Food*  
**POSITION: LETTER OF INFORMATION**

The Maryland Chapter of the American Academy of Pediatrics (MDAAP) is a statewide association representing more than 1,100 pediatricians and allied pediatric and adolescent healthcare practitioners in the State and is a strong and established advocate promoting the health and safety of all the children we serve. On behalf of MDAAP, we submit this letter of information for House Bill 1208, which seeks to prohibit the use of specific food additives in Maryland. We commend efforts to enhance food safety, particularly in protecting children's health from potentially harmful substances.

Recent Federal regulatory actions have already addressed some of the substances covered in House Bill 1208. On January 15, 2025, the U.S. Food and Drug Administration (FDA) revoked authorization for Red Dye #3's use in food and ingested drugs. The ban takes full effect for food by January 15, 2027, and for drugs by January 18, 2028.

Regarding Brominated Vegetable Oil (BVO): On July 3, 2024, the FDA revoked regulations allowing BVO in food. The rule took effect on August 2, 2024, with a compliance deadline of August 2, 2025.

The FDA has not yet taken action to revoke potassium bromate or propylparaben in food, but these substances pose health concerns.

- Potassium Bromate (KBrO<sub>3</sub>): Widely added to flour used in bread making and other baked goods, potassium bromate can be ingested, inhaled or absorbed through skin. Identified toxic effects include: carcinogenicity in rats, including kidney, thyroid, gastrointestinal and testicular cancer; neurobehavioral changes in mice; chromosomal damage and human cell toxicity in vitro; hearing loss. The New Jersey Department of Health and Senior Services list it as a hazardous substance and identify it as a carcinogen, a respiratory irritant and potentially harmful to the kidneys, as well as issuing workplace controls and practice to reduce workplace exposures.
- Propylparaben: As part of the paraben family, this chemical functions as an endocrine disruptor that mimics estrogen. Studies suggest links to reproductive health issues, increased breast cancer risk, gestational diabetes, obesity, and thyroid disorders. Parabens are widely used as preservatives in packaged foods and personal care products.

Given that FDA regulations already address Red Dye #3 and BVO with earlier implementation timelines (2025-2027), House Bill 1208's proposed effective date of October 1, 2028, may be less impactful for these substances. However, banning potassium bromate and propylparaben at the state level could provide additional consumer protections in Maryland.

We are available to provide further research on potassium bromate and propylparaben, as well as any other scientific data that may support the bill's intent. Additionally, our ongoing work on the PFAS Pesticide bill has identified contamination of food products by residues of these pesticides with their demonstrated toxicities, including those PFAS pesticides with only one fully fluorinated carbon atom, which would be relevant to future legislative efforts to ensure the safety of our state's food supply.

We appreciate your leadership in advancing public health protections and would be happy to discuss this further. Please let us know how we can assist in providing additional information or addressing any questions regarding House Bill 1208

**For more information call:**

Christine K. Krone

J. Steven Wise

Danna L. Kauffman

410-244-7000