



Your Dreams, Our Challenge

March 3, 2025

Maryland General Assembly  
House Judiciary Committee  
101 Taylor House Office Building  
Annapolis, Maryland 21401

**Re: HB1112 – PFAS Chemicals - Civil Actions and Prohibition on Consumer Product Sales (Opposed – UNF)**

Dear Chairman Luke Clippinger:

Thank you for the opportunity to submit written testify before the Maryland House Judiciary Committee on HB 1112 – PFAS Chemicals - Civil Actions and Prohibition on Consumer Product Sales, and to offer suggestions on how to improve the bill.

I am President and CEO of AGC America, an international company with almost 4,000 employees working in chemicals, life sciences, automotive glass, electronic materials and R&D operations throughout the United States. Our company supplies a range of specialized industrial chemicals and materials, including resins, coatings, films and membranes, that are incorporated into a wide range of products essential to the daily lives of Maryland residents and businesses.

First, AGC appreciates the legislature's efforts to tackle contamination in Maryland from a small group of PFAS chemicals. We have testified in states across the nation considering PFAS legislation and we have supported legislation, such as [Colorado's recently enacted law](#), focused on eliminating sources of PFAS in priority consumer products such as cleaning products, cookware, food packaging and other similar products.

Our main concern is that HB1112 as currently drafted fails to define "consumer products" but purports to ban the manufacture, sale and distribution of the same by July 1, 2026. Recognizing that Maryland already has PFAS bans for carpets and rugs and food packaging, AGC proposes the following language for consideration in this bill, which would provide clarity as to which consumer products are being banned, as well as consistency with PFAS product bans currently in effect in other states:

- (1) On and after July 1, 2026, a person shall not offer for sale, distribute for sale or distribute for use in the state of the following consumer products that contain intentionally added PFAS (a) cleaning products, except for cleaning products that are floor maintenance products used in hospital or medical settings; (b) cookware; (c) dental floss; (d) menstruation products; and (e) ski wax.

This language, taken from Colorado's law provides the following definitions, which we also recommend the legislature consider incorporating into this bill for clarity and consistency:

- (a) "Cleaning Product" means a finished product used primarily for domestic, commercial, or institutional cleaning purposes. "Cleaning Product" includes an air care product, an automotive cleaning product, a general cleaning product, and a polish or floor maintenance product.
  - i. "Automotive Cleaning Product" means a chemically formulated consumer product labeled to indicate that the purpose of the product is to maintain the appearance of a motor vehicle, including products for washing, waxing, polishing, cleaning or treating the exterior or interior surfaces of motor vehicles; "Automotive Cleaning Product" does not include automotive paint or paint repair products.
- (b) "Cookware" means a durable houseware product that is used in residences or kitchens to prepare, dispense, or store food or beverages. (b) "Cookware" includes pots, pans, skillets, grills, baking sheets, baking molds, trays, bowls, and cooking utensils. (c) "Cookware" does not include food equipment intended primarily for use in commercial settings, including food equipment sold to a business that has a retail food establishment license.

A targeted approach to combat the use of PFAS in certain priority consumer products is consistent with all other states that are tackling this issue and should be similarly employed by Maryland. Failure to narrowly address this issue will result in the unintended prohibition of many products essential to human health and the functioning of society.

Another concern is that HB1112 would treat all 14,000+ PFAS compounds the same. However, they are not the same. This is especially true for fluoropolymers, which our chemicals company processes and sells to customers throughout the U.S. to make hundreds of thousands of manufactured products critical to everyday life, such as wiring insulation for airplanes and electric vehicles, electrical components for cell phones and computers, and gaskets, fuel lines and seals for motor vehicles and manufacturing equipment.

Unlike other PFAS chemicals such as PFOA and PFOS, fluoropolymers are inert, non-toxic, and are not bioavailable. Importantly, they do not dissolve in water, so they cannot migrate to groundwater and do not dissolve in wastewater or drinking water. They also provide a unique combination of physical, chemical and electrical properties that are necessary to enhance the safety, reliability and durability of products under a wide range of operating conditions.

As this bill is considered by the legislature, we urge you to amend the bill to focus on only those PFAS substances that have the greatest potential environmental and health impacts and exclude products containing fluoropolymers from any product bans. Therefore, we propose the following amendment to HB1112, which is found in the current draft of New Mexico's PFAS product bill, [HB212 – the PFAS Protection Act](#):

Prohibitions in this Subsection do not apply to:

- (1) a product that contains fluoropolymers consisting of polymeric substances for which the backbone of the polymer is either a per- or polyfluorinated carbon-only backbone or a perfluorinated polyether backbone that is a solid at standard temperature and pressure.

The inclusion of a fluoropolymer exemption would prevent the unintended prohibition of hundreds of thousands of essential products, while still ensuring the intent of this bill is satisfied – protecting human health from exposure of harmful PFAS.

Thank you for the opportunity to share our views. We look forward to working as a partner with you and the Legislature on these issues as you consider this legislation further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Correnti', with a long horizontal line extending to the right.

Christopher F. Correnti  
President and CEO  
AGC America, Inc.