

March 3, 2025

Delegate Luke Clippinger  
Chair  
House Judiciary Committee  
101 Taylor House Office Building  
6 Bladen St.  
Annapolis, MD 21401

Delegate Sandy Bartlett  
Vice Chair  
House Judiciary Committee  
101 Taylor House Office Building  
6 Bladen St.  
Annapolis, MD 21401

Chair Clippinger and Vice Chair Bartlett, and members of the Committee, thank you for the opportunity to share the viewpoints of the home appliance manufacturing industry regarding the potential impacts of HB 1112. **We would request an unfavorable report on HB 1112 due to the serious unintended consequences of this proposal.**

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's members produce hundreds of millions of products each year. They design and build products at the highest levels of quality and safety. As such, they have demonstrated their commitment to strong internal safety design, monitoring, and evaluation/failure analysis systems. AHAM supports the intent to protect consumers against all unreasonable risks, including those associated with the exposure to potentially harmful chemicals. AHAM also firmly supports the appropriate use of PFAS chemicals in appliances. Together with industry design practices, test requirements, and redundant safety mechanisms, PFAS chemicals play an important role in the safety of household appliances. PFAS are used for their self-lubricating properties and great resistance to high temperature, chemical aggression and pressure. They are often confined to internal components and parts, such as bolts, washers and gaskets, plastic brackets, and wire terminals

The proposed bill would be the broadest and quickest ban in the country on products containing PFAS and have far reaching negative consequences on appliance product safety and product availability for Maryland residents. The rapidly approaching 2026 proposed deadline will require manufacturers to make quick product planning decisions, given the lead-time needed from design to production of appliances, which can take several years. This additional time is needed to identify substitutes, and even if a substitute is found, manufacturers need time to test, design, retool, and restock global supply. Within the broad 2026 PFAS ban, it would include semiconductors, gaskets, wirings, circuit boards, and hydrofluoroolefins (HFOs) which are one of the more climate friendly alternatives for use as refrigerator insulation foam blowing agents. Several other states have recognized these unique instances and pushed prohibitions into 2040. This proposed restriction of chemicals would require a total re-design of models at significant cost and regrettably, failing to make necessary corrections could lead to manufacturers limiting or restricting essential household products that Maryland residents rely on.

AHAM appreciates the opportunity to comment and would consider the potential implications before moving forward. We would be happy to discuss these details further.

Respectfully submitted,

A handwritten signature in black ink that reads "John Keane". The signature is written in a cursive style with a horizontal line above the first name.

John Keane  
Manager of Government Relations