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Committee: Education, Energy, and the Environment
Testimony on: SB 686 PFAS Chemicals – Product Phase outs and Registration Requirements
Position: Favorable with Amendments
Hearing Date: February 24, 2026

Dear Chair Feldman, Vice Chair Kagan, and Members of the Committee:

The Consumer Technology Association (CTA) urges a favorable report of SB 686 but with amendments. CTA is North America's largest technology trade association. Our members are the world's leading innovators – from startups to global brands helping support more than 18 million American jobs.

While CTA appreciates the bill's intent to restrict PFAS in a number of product categories, we're concerned with the registration requirements in the bill. PFAS includes a broad class of thousands of chemicals, some of which are necessary for the manufacture and function of electronics products. S686 proposes a PFAS reporting system that would have significant impact on the electronics sector, requiring manufacturers of all products containing PFAS to register information about PFAS in products by January 1, 2028.

Reporting Section 6-1606

We are concerned with the registration requirements in Section 6-1606 and respectfully ask that this section be removed or amended. Other states with similar laws, like Maine and Minnesota, have been working for several years on developing comprehensive PFAS regulations that govern all consumer products. However, they are still navigating how to make these programs workable for all stakeholders. Electronics are complex articles, and a single product can have thousands of components sourced from multiple layers of suppliers across the global supply chain. Any chemical reporting system for complex articles has to be nuanced and designed carefully, and we are concerned with the creation of a patchwork of conflicting systems that add no additional benefit to consumers.

We respectfully ask this Committee not to establish any PFAS reporting system until the programs in these other states can be finalized, and then simply align with those programs when they have matured. We respectfully ask that the Committee remove Section 6-1606 or amend it to only apply to the product categories listed in Section 6-1605

If Maryland is interested in adopting restrictions on PFAS in the product categories outlined in S686, we encourage the Committee to look to the new law passed in New Jersey S.1042¹ which has a reasonable structure and clear requirements for regulating PFAS in products.

¹ <https://www.njleg.state.nj.us/bill-search/2024/S1042>

Textile Definition

The definition for “textile” in S686 means “an item made in whole or in part from a natural or synthetic fiber, yarn, or fabric, including leather, cotton, silk, jute, hemp, wool, viscose, nylon, or polyester.” This definition is broad and may capture products that are not intended in scope. For example, some products like speakers or headphones could accidentally fall under the definition of a product that is made “in part” from natural or synthetic fibers. Electronic products have components like semiconductors or batteries that necessarily contain PFAS in order to function. We ask that the definition of “textile” specify that it applies only to the textile components of a product, or that the definition explicitly excludes electronic products.

Conclusion

We thank the Committee for the opportunity to provide our feedback on SB 686 and urge a favorable report with amendments. If the Committee is able to remove Section 6-1606, or limit reporting only to the product categories covered in the rest of the bill, then CTA would have no concerns with SB 686. Please do not hesitate to contact us if you have any questions regarding our testimony.

Sincerely,
Daniel Moyer
Consumer Technology Association