



February 24, 2026

The Honorable Brian Feldman
Senate Committee on Education, Energy, and the Environment
Miller Senate Office Building, Room 2 West Wing
11 Bladen Street
Annapolis, MD 21401-1991

RE: SB 686- PFAS Chemicals – Product Phase Outs and Registration Requirements (Amendment Request)

Dear Chairman Feldman:

On behalf of the RV Industry Association (RVIA), I am writing to express our concerns regarding SB 686. The bill would prohibit the sale of products containing intentionally added PFAS and require manufacturers of products with intentionally added PFAS to register and submit detailed chemical information to the State.

RVIA is the national trade association representing over 470 manufacturers and component and aftermarket suppliers who together build more than 98 percent of all recreational vehicles (RVs) produced in the United States. The uniquely American RV industry contributes \$140 billion annually to the U.S. economy and supports 680,000 full-time American jobs. Specifically, in Maryland, the RV industry contributes \$937 million to state and local economies and supports over 5,085 jobs, with 143 businesses providing products and services to consumers who utilize RVs for travel and recreation.

While the association supports common-sense legislation aimed at protecting consumers and reducing exposure to PFAS in applicable consumer products, we have several concerns with SB 686 as currently drafted.

Why RVs Are Unique

RVs, which include both motorized and towable units, are vehicles designed, engineered, and assembled for temporary, seasonal, and recreational use. They are not intended for permanent residential housing. Like many state PFAS-related bills, SB 686 aims to protect consumers and limit exposure to PFAS in residential and commercial products.

Furthermore, RVs are not intended for everyday transportation and are used for a median of 30 days per year. Additionally, the RV industry is committed to eliminating nonessential uses of PFAS where practicable. For these reasons, we ask you to work with industry partners, including RVIA, to ensure the unique nature of RVs is appropriately accounted for in this legislation by providing a motor vehicle exemption, which includes motorized and towable RVs.

As drafted, the inclusion of textiles, upholstered products, and fabric treatments within SB 686's scope would directly impact core RV components. Compliance would require significant coordination across a broad supplier network and given the layered nature of RV manufacturing and long product development cycles, compliance with the bill's implementation timeline may present practical challenges for

manufacturers and suppliers, many of whom rely on a global supply chain for sourcing thousands of parts and materials.

In its current form, RVIA has no choice but to oppose SB 686, unless amended to include a clear motor vehicle exemption covering both motorized and towable RVs. We urge Maryland to adopt a more balanced, science-based approach, similar to the EPA's strategy, which targets only specific PFAS chemicals shown to cause harm. Additionally, the proposed timeline for broad prohibitions on complex products with intentionally added PFAS is unrealistic and would disrupt production without clearly defined alternative materials or viable pathways for compliance. We encourage Maryland policymakers to work closely with industry partners to develop feasible timelines and a phased approach focused on eliminating nonessential uses of proven harmful PFAS chemicals.

Several states have recognized the distinct nature of vehicles, including RVs, in their PFAS laws and regulations. For example, Maine exempts motor vehicles and motor vehicle equipment regulated under federal motor vehicle safety standards from reporting and prohibition requirements; California excludes RVs from the definition of "textile articles" used in households and businesses; and Connecticut exempts motor vehicle products, including textile furnishings, rugs, and carpets. We strongly encourage Maryland to align with this precedent and ensure motor vehicles, including motorized and towable RVs, are exempt from regulation under SB 686 to maintain consistency with other states and avoid unintended regulatory burdens.

Proposed Addition to the Bill

To accomplish this, RVIA proposes adding a motor vehicle exemption that would include both motorized and towable RVs to Section 6-1605 as follows:

(4) "Motor vehicles" as defined by 49 U.S. Code § 30102(7)

The RV industry recognizes the critical environmental concerns surrounding PFAS and appreciates the opportunity to work with legislators to balance environmental goals with practical feasibility.

Thank you for your attention to this important matter. Please do not hesitate to contact me if you have any questions or would like to discuss this further.

Sincerely,



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Cc: Members of the Senate Committee on Education, Energy, and the Environment