

Testimony: House Bill 1022
PFAS Chemicals -- Product Phase Outs and Registration Requirements

Committee: Health Committee

Date: March 10, 2026

Position: **Oppose Unless Amended**

Dear Chairman Bagnall, Vice-Chair Cullison and Members of the Health Committee:

My name is Hayley Davis, and I am the Manager of State Government Affairs at the Air-Conditioning, Heating, and Refrigeration Institute (AHRI). I appreciate the opportunity to submit this testimony on behalf of AHRI, the national trade association representing the heating, air conditioning, ventilation, and commercial refrigeration (HVACR) and water heating industry.

AHRI represents more than 330 manufacturers of HVACR and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians employ more than 700,000 people. In Maryland, the HVACR and water heating industry supports more than 8,100 jobs and contributes more than \$2.6 billion in economic activity.

AHRI commends the Senate bill sponsor Senator Sara Love for committing to amending the bill to remove the reporting requirements while still removing PFAS from high-exposure products, but respectfully requests the bill sponsors and committee to consider definition and reporting changes to maximize consumer benefits while ensuring practical implementation.

Definitions

AHRI recognizes the complexity of defining PFAS but notes that the proposed definition in the bill encompasses between 9,000 to over 7 million chemicals, which would unintentionally include low-risk refrigerant blends and fluoropolymers.

AHRI recommends narrowing HB 1022's definition of PFAS to high-risk persistent, bioaccumulative, and toxic (PBT) PFAS, to avoid capturing products that do not pose a public health risk, and to provide greater clarity for regulated industries.

Reporting

AHRI has several concerns about the ambiguity of the proposed “PFAS Disclosure Forms” and requests that the sponsor and House Health Committee consider the following three recommendations to improve reporting requirements.

First, AHRI recommends that the bill require the Maryland Department of the Environment (MDE) to publish a list of covered PFAS chemicals, identified by their Chemical Abstracts Service Number (CASRN), in lieu of requiring all “intentionally added PFAS.” Given the breadth of PFAS, a defined list of covered chemicals eliminates ambiguity about regulatory scope and allows the MDE to concentrate on substances that pose real risks to human health and the environment.

Second, AHRI recommends that a PFAS reporting program be given a minimum of twenty-four (24) months between publication of the final reporting requirements and the compliance date to allow companies sufficient time to develop and implement a tracing program.

Finally, AHRI recommends that the program permit reporting of covered chemicals based on information that is “reasonably ascertainable.” The U.S. Environmental Protection Agency defines this standard to include all information in a manufacturer’s possession or control, plus all information that a reasonable person similarly situated might be expected to possess, control, or know. Laboratory testing can quickly become cost prohibitive to businesses and will increase costs for consumers.

Conclusion

AHRI supports the bill’s objective to protect public health from harmful chemicals but believes that a more targeted approach would allow the bill to be feasibly implemented. Thank you for considering our feedback.

Sincerely,

Hayley Davis
Manager, State Government Affairs
hdavis@ahrinet.org