



May 31, 2024

The Honorable Greg Vitali, Chair
The Honorable Martin Causer, Republican Chair
House Committee on Environmental Resources and Energy
Pennsylvania House of Representatives
Commonwealth Avenue, Harrisburg, PA

RE: **Oppose HB 2238 a bill that establishes requirements, prohibitions, and programs for regulation of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in certain products**

Dear Chairs Vitali and Causer, and distinguished members of the House Committee on Environmental Resources and Energy,

As a highly regulated industry subject to meeting the most scientifically rigorous regulatory requirements before products may be offered for sale and use, we respectfully oppose HB 2238. The cornerstone of the pesticide regulatory process is a thorough risk assessment that supports safe product use. No other products in the marketplace are required to meet such stringent requirements at both the state and federal levels.

Pesticides, including those that may contain fluorinated chemistry, are essential to protecting public health, safety, state and local infrastructure, homes, communities, and ecosystems in Pennsylvania. The pesticides available to Pennsylvania's consumers and professionals are used to protect homes and structures, manage mosquito and tick populations, create fire breaks, maintain roadway lines of site, keep transportation and utility rights of way clear of vegetation, manage invasive and non-native species on land and in water, and to maintain recreational areas. Consumers rely on pesticides to protect their homes and yards from rodent infestations, stinging and invasive insects, and to protect garden and landscape plants from insects and plant diseases. Provisions in HB 2238 for future discretionary product bans would impact the future availability of state and federally registered pesticide products to the detriment of the state's consumers, professional applicators, infrastructure, and environment.

Pesticides are unique substances with more scientific data available about them than for any other products available in commerce today. Pesticide products are subject to regulation and oversight from five federal agencies: United States Environmental Protection Agency (EPA), Department of Agriculture, Food and Drug Administration, Fish and Wildlife Service, and National Marine Fisheries Service. This stringent multi-agency federal regulatory oversight framework is focused on ensuring products can be used safely.

To approve a new pesticide under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), EPA must determine that, when used in accordance with the label, it will *not* cause unreasonable adverse effects on the environment and *does* provide a reasonable certainty of no harm to human health.¹ EPA must periodically review registered pesticides to ensure they continue to meet this robust safety standard. Language within HB 2238 acknowledges the scientific rigor of FIFRA regulation.

All pesticides, including those that may be formulated with fluorinated chemistry, must already be registered by EPA prior to applying for and receiving a state registration from the Pennsylvania Department of Agriculture's Bureau of Plant Industry under the Pennsylvania Pesticide Control Act of 1973. Before pesticides even enter commerce in Pennsylvania, they must already be deemed safe by EPA.

Our members are committed to providing the regulated, safe, and necessary products for protecting people, homes, public health and safety, infrastructure, and the environment in Pennsylvania. We oppose HB 2238 for the reasons described here. Thank you for your consideration and please contact us if we can provide more information or answer committee member questions.

Sincerely,



Megan J. Provost
President
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RISE (Responsible Industry for a Sound Environment)[®] is the national trade association representing manufacturers, formulators, distributors, and other industry leaders engaged with specialty pesticides and fertilizers used by professionals and consumers. Learn more at www.pestfacts.org.

¹ 7 U.S.C. §136a(c)(5).