



*Advocating the views of convenience stores, supermarkets,
independent grocers, wholesalers and consumer product vendors.*

June 3, 2024

Re: HB 2238 | Consumer Product Per- and Polyfluoroalkyl Chemicals (PFAS) Chemical Ban

Dear Chairman Vitali, Chairman Causer, and members of the committee,

My name is Alex Baloga and I am the president and CEO of the Pennsylvania Food Merchants Association. PFMA is a statewide trade association advocating the views of food retailers, wholesalers, and consumer product vendors operating in Pennsylvania. We represent more than 600 corporate members who operate more than 5,000 retail food stores and employ more than 300,000 Pennsylvanians up and down the food supply chain. Thank you for the opportunity to share our thoughts on this topic.

Known collectively as PFAS, per- and polyfluoroalkyl substances are a collection of synthetic chemicals used in a broad range of products, from firefighting foam to food packaging. PFAS chemicals, of which there are more than 7,800 types, were first introduced in the 1940s and contain useful qualities including heat and water resistance, and in cookware are noted for their non-stick properties.

PFAS have been dubbed “forever chemicals” because they are extremely stable, slow to break down and certain types have been shown to accumulate over time in the environment and in human bodies.

Certain PFAS that the US Food and Drug Administration has found impactful to human health, including those known as PFOA and PFOS, are no longer manufactured in the US, though they are still used internationally and find their way into the country in imported products.

FDA authorization requires that available data show there is a reasonable certainty of no harm under the intended conditions of use. In 2020, the FDA announced a voluntary phase-out of certain PFAS used in food packaging. Under this agreement, PFAS manufacturers involved in the effort have been working to phase out specific PFAS chemicals by January 2024. The FDA is continuing to study the impact of PFAS in the food supply and assessing potential health concerns from these types of chemicals.

Fundamentally, our members agree with this approach and believe addressing PFAS is best done at the federal level. Many businesses in our association operate across multiple states and complying with varying standards, timelines and thresholds depending on the jurisdiction is extremely challenging, and in some cases simply unworkable. I want to emphasize that this is not an expression of opposition to the goal of mitigating the presence of harmful PFAS chemicals in food packaging or other products. Rather it is support for a uniform, nationwide strategy that recognizes the myriad challenges faced along the supply chain as we all work towards a shared objective.

We appreciate the interest of the committee in this important issue and are happy to serve as a resource going forward.

Sincerely,

Alex Baloga
President and CEO, PFMA