Dear Senators:

The organizations listed below write in support of AB 2247, a bill that will require manufacturers of products or substances sold in, or imported into, the state to report the presence of intentionally added perfluoroalkyl and polyfluoroalkyl substances (PFAS) in those products or substances. The reports shall be registered on a publicly accessible, interstate platform.

Our diverse organizations share an increasing concern about the vast use of PFAS chemicals, which build up in our bodies, don’t break down easily or break down into other PFAS and are now a ubiquitous presence in nature. PFAS are found across the United States and throughout California. As of August of 2021, PFAS pollution was detected in nearly 3,000 public and private water systems in 50 states and two territories. In California, a recent evaluation of PFAS in 248 water systems’ water found the chemicals in the water of 65 percent of those systems. More than 16 million people are served by these 161 systems. An ongoing investigation by the State Water Board is evaluating sources of PFAS in wastewater and biosolids, and additional tools are being developed to help local wastewater agencies to identify and trace sources of PFAS contamination throughout the sewershed.

PFAS are among the most persistent toxic compounds in existence, contaminating everything from drinking water to food and, because of their grease and water proof qualities are used widely in consumer products, such as food packaging, personal care products, and textiles, as well as industrial products and processes. They are found in the blood of virtually everyone on earth, including newborn babies. Very low doses of PFAS chemicals in drinking water have been linked to suppression of the immune system, interference with vaccines, and are associated with an elevated risk of cancer, increased cholesterol, and reproductive and developmental harms, among other serious health concerns.

While we know that some products contain PFAS, we don’t know how PFAS is being used throughout the marketplace or in industrial processes. Such knowledge is key to ensuring that our state and local regulators can manage PFAS pollution, implement meaningful source control, and ensure that the public isn’t unnecessarily exposed to the chemicals – all of which is necessary to reduce ultimate costs to the state and its residents.

In the future, pollution prevention will be a key strategy for managing PFAS. As drinking water and wastewater operators, as well as air and solid waste regulators look to proactively implement source control programs to protect public health, they need information about the
sources of PFAS in commerce to support efforts to reduce inputs to the environment. Solely relying on treatment technologies to remove PFAS is costly and does not destroy the PFAS compounds, but rather ultimately results in the disposition of PFAS to another waste stream. For this reason, pollution prevention is the most cost effective and meaningful PFAS management approach.

It is critical for the state and the public to understand how PFAS chemicals are used and how much of the chemicals are imported into California. AB 2247 will ensure that manufacturers have to report their PFAS use to the state, and the bill will create a modest, but straightforward, method for the state to manage this information. This is a key first step to understanding and ultimately managing PFAS contamination in California.

Thank you, again, for considering our support for this bill. We look forward to working with you and the committee to better understand PFAS contamination in California.

Sincerely,

Jessica Gauger, Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies (cosponsor)

Andria Ventura, Legislative and Policy Director
Clean Water Action (cosponsor)

Susan Little, Senior Advocate, California Government Affairs
Environmental Working Group (cosponsor)

Robert M. Gould, MD, President
San Francisco Bay Physicians for Social Responsibility

Heidi Sanborn, Executive Director
National Stewardship Action Council

Laura Anthony, Program Coordinator
Save the Albatross Coalition

Uriel Saldivar, Senior Policy Advocate
Community Water Center

Kevin Hamilton, CEO
Central California Asthma Collaborative

Lenny Siegel, Executive Director
Center for Public Environmental Oversight
Brandon Dawson, Director
Sierra Club California

Doug Kobold, Executive Director
California Product Stewardship Council

Elizabeth Dougherty, Ph.D., Executive Director
Wholly H2O

Sherri Norris, Executive Director
California Indian Environmental Alliance

Avinash Kar, Senior Attorney and Director,
State Health Policy, Healthy People & Thriving Communities Program
Natural Resources Defense Council

David Diaz, MPH, Executive Director
Active San Gabriel Valley

Kristie Sepulveda-Burchit, Executive Director,
Educate. Advocate.

Jonathan Evans, Environmental Health Legal Director and Senior Attorney
Center for Biological Diversity

Grace Lee, Director
ReThink Disposable

Laura Walsh
Laura Walsh, California Policy Manager
Surfrider Foundation

Michael Rincon, Water and Toxic Policy Manager
Physicians for Social Responsibility-Los Angeles

Rebecca Spector, West Coast Director
Center for Food Safety

Polly V. Marshall, Executive Director
Breast Cancer Over Time

Jenn Engstrom, State Director
California Public Interest Research Group
CALPIRG

Sean Bothwell, Executive Director
California Coastkeeper Alliance

Katie Huffling, DNP, RN, CNM, FAAN
Executive Director
Alliance of Nurses for Healthy Environments
Catherine Dodd PhD, RN, Policy Advisor
Families Advocating for Chemical and Toxic Safety

Miriam Gordon, Policy Director
Upstream

Thomas Gremillion
Thomas Gremillion, Director of Food Policy
Consumer Federation of America

Lucy Morales, Program Coordinator
Worksafe

Katherine Alcántar, MPA/MPH, Interim Policy Director
Center for Environmental Health

Patrick MacRoy, Deputy Director
Defend Our Health

Katherine Carvlin, MS, ND, Executive Director
National Association of Environmental Medicine

Robert Bowcock, Founder and Managing Director
Integrated Resource Management, LLC

Erin Brockovich, Founder
Erin Brockovich Foundation

Nancy Buermeyer, Director of Program and Policy
Breast Cancer Prevention Partners

Kim Konte
Kim Konte, Founding Member
Non Toxic Neighborhoods

Melissa Romero, Senior Legislative Manager
California Environmental Voters

Erica Donnelly-Greenan, Executive Director
Save Our Shores

Dianna Cohen, Chief Executive Officer
Plastic Pollution Coalition

Christopher Chin, Executive Director
The Center for Oceanic Awareness, Research, and Education (COARE)

Anna Cummins, Interim Executive Director & Co-Founder
The 5 Gyres Institute
Leslie Mintz Tamminen, Director
Seventh Generation Advisors

Emily Parker, Coastal and Marine Scientist
Heal the Bay

Mati Waiya, Executive Director
Wishtoyo Chumash Foundation

Ruth Abbe, President
Zero Waste USA

Julie Andersen, Global Executive Director
Plastic Oceans International

David Krueger, President
Northern California Recycling Association

Sejal Choksi-Chugh, Executive Director
San Francisco Baykeeper

Arlene Blum, PhD, Executive Director
Green Science Policy Institute

Mark S. Rossi, PhD, Executive Director
Clean Production Action

Alicia Culver, Executive Director
Responsible Purchasing Network

Cheryl Auger, President
Ban SUP (Single Use Plastics)

Amy Ziff, Founder & Executive Director
Made Safe

Anita Ghazarian
Anita Ghazarian, OD
Vice President, Ban SUP
Environmental Lead, Indivisible Alta Pasadena

Lisa Archer, Director, Food & Agriculture Program
Friends of the Earth U.S

Jim Lindburg, Legislative Consultant
Friends Committee on Legislation of California