March 2, 2022

Dear Chair Stephenson and Commerce Finance and Policy Committee Members:

I am writing on behalf of the North Star Chapter of Sierra Club in support of the following bill:
 HF 3571 Ban PFAS in Juvenile Products

Parents want to give their kids a good start in life and protect them from harm. They child-proof their home, fasten their kids into car seats, and immunize their kids to protect them from serious diseases. Few parents though realize the danger they are exposing their kids to from products they purchase that contain PFAS. Even if they are aware and want to avoid those products, it is nearly impossible to do that because there is no ‘PFAS warning label’. Parents assume products available to purchase are also safe to use.

“Stain-resistant” and “waterproof" are common themes with children’s products. They may seem like a must-have feature for a mattress pad or stroller, but few parents would knowingly trade their kid’s health for a stain-free fabric. Parents do not have the full picture of the risks from PFAS- treated products.

PFAS does not wash out of products after a few washings. As the fibers start to break down, the amount of PFAS flaking off can increase. In the laundry, the chemical can spread to other items. PFAS also ends up in the wastewater stream and into drinking water.

Some toxic chemicals, like phthalates, leave the body within days after exposure ends; PFAS however bioaccumulate and may take years. Children, especially babies, are most at risk because they are exposed during times of development and because of the exposure levels compared to their body weight. They may also be exposed for long periods of time.

Harvard professor, Phillipe Grandjean said that during breastfeeding, “The infant may reach a blood concentration of PFAS that is 10-fold higher than the mother’s. And this happens at the most vulnerable stage of life, when various organs and biochemical functions are being fine-tuned. If something goes wrong at this stage, it will likely stay with us for the rest of our lives and affect our disease risks later on.”

There is a growing body of evidence that PFAS are associated with serious health impacts. A 2016 review study of endocrine-disrupting chemicals included the following: “Evidence is particularly strong for relations between perfluoroalkyl substances and child and adult obesity, impaired glucose tolerance, gestational diabetes, reduced birthweight, reduced semen quality, polycystic ovarian syndrome, endometriosis, and breast cancer.”

Some may argue that not all PFAS have the same health risks. That is true but there are few risk assessments or test data for most of the PFAS in commercial use. Testing is time consuming and expensive. If tests are conducted for one compound that show potential harm, manufacturers can switch to another one. They rarely disclose which PFAS compounds a product may contain and products often are treated with multiple PFAS.

In 2019 Minnesota passed a law, that takes effect in July, to ban flame retardants from juvenile products, mattresses, and residential textiles. It should be equally as important and doable to remove PFAS from these same products. Alternatives are becoming more available as parents start to ask for safer products. This shows that manufacturers can make children’s products without PFAS when they realize it is a priority for their customers.

It seems that the more studies show the health and environmental risks from PFAS, testing reveals its use in more and more products. With every item treated with PFAS, more drinking water becomes contaminated, more consumers are exposed to PFAS, and more stress is placed on downstream systems. There is a growing concern from waste managers that their options for managing PFAS is not keeping up with regulations on what constitutes safe levels. The MPCA said that an upstream approach of eliminating PFAS in products is the best approach to prevent downstream contamination. If we fail to reduce the production and use of PFAS, future generations will pay the environmental and health cost.

This bill is important to protect the health of our children. I thank Representative Kotyza-Witthuhn for bringing it forward and urge you to support it.

Sincerely,

Lori Olinger
Chair, Zero Waste Task Force
Sierra Club North Star Chapter

[Early life exposure to per- and polyfluoroalkyl substances (PFAS) and latent health outcomes: A review including the placenta as a target tissue and possible driver of peri- and postnatal effects](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7530144/)

[PFAS and flame retardant free booster seats](https://www.becausehealth.org/non-toxic-booster-seats-2650419742.html)

[Waste companies worry PFAS research is not moving fast enough as they prepare for regulatory changes](https://www.wastedive.com/news/gwms-2022-pfas-landfill-leachate-eref/619191/)

[Why more stringent regulation is needed for “forever chemicals”](https://www.hsph.harvard.edu/news/features/why-more-stringent-regulation-is-needed-for-forever-chemicals/)

[Endocrine-disrupting chemicals: implications for human health](https://www.thelancet.com/journals/landia/article/PIIS2213-8587%2820%2930129-7/fulltext)