



June 8th, 2026

The Honorable Matt Bradford
Democratic Leader
Pennsylvania House of Representatives

The Honorable Jesse Topper
Republican Leader
Pennsylvania House of Representatives

RE: Concerns with HB 2145 – PFAS Restrictions in Consumer Products

Dear Leader Bradford and Leader Topper:

The undersigned organizations write to express concerns regarding House Bill 2145, which would prohibit the manufacture and sale of cosmetics, dental floss, juvenile products, and menstrual products containing intentionally added per- and polyfluoroalkyl substances (PFAS) beginning January 1, 2028.

We support policies that protect human health and the environment and recognize the importance of evaluating the use of PFAS in consumer products. However, HB 2145 adopts an expansive definition of PFAS and applies a blanket prohibition across diverse chemistries without adequately considering differences in hazard profiles, exposure potential, product function, or the availability of technically and economically feasible alternatives.

The bill makes no attempt to prioritize the types of PFAS that are most important for the state to address. PFAS are a diverse set of chemistries with different properties that determine their uses and hazard profiles. For example, some PFAS are water soluble and have been shown to bioaccumulate. Others, like fluoropolymers and high molecular weight perfluoropolyethers, are polymers of low concern for human health and the environment.^{1,2,3}

The bill would also require manufacturers to certify that covered products do not contain intentionally added PFAS. While straightforward in concept, implementation presents significant practical challenges. Manufacturers often do not receive ingredient-level information from every supplier throughout a complex global supply chain and may lack access to validated testing methods capable of verifying compliance across all covered product categories.

Experience in other states demonstrates that PFAS product restrictions are difficult to implement. States pursuing similar policies have encountered substantial challenges related to supply chain transparency, reporting systems, confidential business information protections, and the availability of alternative materials. These implementation challenges have frequently required legislative revisions, delayed deadlines, or additional regulatory flexibility. HB 2145 imposes additional notification and certification requirements that are disconnected from the realities of modern supply chains, including obligations to identify, notify, track and obtain written confirmation from every vendor, purveyor, and supplier associated with covered products. Similar requirements in other states have proven extraordinarily difficult to administer and risk creating significant compliance burdens while providing little meaningful regulatory benefit.

We are also concerned that HB 2145 would contribute to a growing patchwork of state-specific PFAS product restrictions. Manufacturers, retailers, and distributors operating nationally are increasingly faced with differing product requirements, definitions, timelines, and compliance obligations from state to state. This fragmented regulatory environment increases costs and complexity without necessarily improving public health outcomes.

¹ Henry, B.J. et al. 2018. A critical review of the application of polymer of low concern and regulatory criteria to fluoropolymers. *Integr Environ Assess Manag*, 14: 316-334, <https://doi.org/10.1002/ieam.4035>.

² Korzeniowski, S.H. et al. 2022. A critical review of the application of polymer of low concern regulatory criteria to fluoropolymers II: Fluoroplastics and fluoroelastomers. *Integr Environ Assess Manag*, <https://doi.org/10.1002/ieam.4646>.

³ Javed, H. et al. 2025. A critical review of the application of polymer of low concern and regulatory criteria to perfluoropolyethers. *J Flu Chem*, <https://doi.org/10.1016/j.jfluchem.2025.110459>.

As policymakers continue to evaluate PFAS-related legislation, we encourage a science-based, risk-based approach that recognizes the diversity of PFAS chemistries, prioritizes uses of greatest concern, considers exposure pathways, and provides adequate time and flexibility for implementation where alternatives may not yet be available.

We respectfully urge consideration of these concerns and welcome the opportunity to work with policymakers and stakeholders on approaches that protect human health and the environment while remaining practical and workable for consumers, manufacturers, and retailers.

Sincerely,

Pennsylvania Chamber of Business and Industry

Pennsylvania Chemical Industry Council

Pennsylvania Food Merchants Association

Pennsylvania Manufacturers' Association

Alliance for Chemical Distribution (ACD)

American Chemistry Council

American Coatings Association

Animal Health Institute

Association of Home Appliance Manufacturers

Baby Safety Alliance

Center for Baby and Adult Hygiene Products (BAHP)

Communication Cable and Connectivity Association

Consumer Brands Association

Consumer Healthcare Products Association

European Federation of the Cookware, Cutlery and Houseware Industry (FEC)

Household & Commercial Products Association

International Sleep Products Association (ISPA)

National Federation of Independent Business

North American Association of Food Equipment Manufacturers (NAFEM)

Personal Care Products Council (PCPC)

Plastic Pipe and Fittings Association (PPFA)

Plastics Industry Association

Print Creative Alliance

PRINTING United Alliance

Responsible Industry for a Sound Environment (RISE)

Society of Chemical Manufacturers & Affiliates (SOCMA)

Spray Polyurethane Foam Alliance

The American Home Furnishings Alliance (AHFA)

TRSA - The Linen, Uniform and Facility Services Association

Truck and Engine Manufacturers Association (EMA)