



**TO:** Chair Lively  
Members of the House Committee on Climate, Energy, and Environment

**FR:** Shawn Miller, Lobbyist, Northwest Grocery Retail Association  
Mia Noren, Legislative Director, Northwest Grocery Retail Association

**RE:** Opposition to HB 3512

March 13, 2025

As background, the Northwest Grocery Retail Association (NWGRA) serves as the leading advocate for the grocery retail sector, representing chain and independent grocery stores, suppliers, private labels, and manufacturers in the Pacific Northwest, including Oregon, Washington, and Idaho. Collectively NWGRA members employ more than 44,000 people at more than 409 locations across Oregon.

During the 2023 session, NWGRA participated in a workgroup led by Senator Sollman, collaborating to reach a consensus on SB 543, which prohibits the sale of food ware containers with intentionally added PFAS. The development of SB 543 was an inclusive and collaborative process. Unfortunately, HB 3512 has not undergone the same level of stakeholder engagement as previous efforts with similar objectives.

HB 3512 mandates that manufacturers provide a certificate of compliance for all covered products sold in Oregon. This places an enormous administrative burden on both manufacturers and retailers, who must track and verify compliance for thousands of products. Given the complexity of supply chains, ensuring compliance for every supplier—especially for national and global brands—will be a logistical nightmare, potentially leading to product shortages and increased operational costs.

Banning PFAS-containing products at the state level for so many products creates compliance challenges for retailers operating in multiple states, leading to fragmented regulatory requirements. A more effective approach would be to align with federal efforts that ensure nationwide consistency and feasibility in implementing PFAS restrictions.

Oregon's grocery retailers are committed to consumer safety and environmental responsibility, but HB 3512, as written, will disrupt supply chains, increase costs, and limit product availability. We encourage lawmakers to work with industry stakeholders to develop practical, science-based solutions that consider stakeholder input.