



March 14, 2025

Dear Chair Lively and Members of the Committee:

On behalf of the Center for Food Safety (CFS), we respectfully submit this testimony in **strong support** of House Bill 3512, which will prohibit the sale and distribution of certain products containing intentionally added perfluoroalkyl and polyfluoroalkyl substances (“PFAS”).

CFS is a national, nonprofit public interest and environmental advocacy organization dedicated to protecting human health and the environment by promoting sustainable food systems on behalf of our thousands of Oregon members. Our work is guided by scientific research and policy advocacy aimed at reducing harmful chemicals in food production, packaging, and distribution. We are particularly concerned about the **presence of PFAS in food and food packaging**, as these chemicals pose significant risks to public health and environmental safety. PFAS chemicals are a well-proven threat to human health and are not needed: other, safer alternatives exist.

I. PFAS in the Food System: A Serious and Widespread Threat

PFAS, often referred to as “forever chemicals,” are a class of synthetic compounds that do not break down in the environment or the human body.¹ Due to their grease-resistant, water-resistant, and nonstick properties, PFAS have been widely used in food packaging, cookware, and agricultural products for decades.² Unfortunately, this has led to widespread contamination of food, soil, and drinking water.³

One of the most direct pathways for PFAS exposure is through food packaging.⁴ These chemicals are commonly used to make materials resistant to grease, oil, and

¹ *Per- and Polyfluoroalkyl Substances (PFAS)*, U.S. FOOD & DRUG ADMIN. <https://www.fda.gov/food/environmental-contaminants-food/and-polyfluoroalkyl-substances-pfas> (last updated Jan. 3, 2025); Alessio Filippo Peritore et al., *Current Review of Increasing Animal Health Threat of Perand Polyfluoroalkyl Substances (PFAS): Harms, Limitations, and Alternatives to Manage Their Toxicity*, 24 INT’L J. OF MOLECULAR SCI.’S 1, 1 (2023).

² Courtney Lindwall, “Forever Chemicals” Called PFAS Show Up in Your Food, Clothes, and Home, NRDC (Apr. 10, 2024), <https://www.nrdc.org/stories/forever-chemicals-called-pfas-show-your-food-clothes-and-home>.

³ *Id.*

⁴ See Drake W. Phelps, *Per- and Polyfluoroalkyl Substances in Food Packaging: Migration, Toxicity, and Management Strategies*, 58 ENV’T SCI. & TECH. 5670–78 (2024).

moisture,⁵ which is why they are frequently found in fast food wrappers, takeout containers, microwave popcorn bags, pizza boxes, deli papers, and more.⁶ Studies have shown that PFAS migrate from packaging into food, particularly when exposed to heat, grease, acidity, or prolonged storage.⁷ This means that everyday foods are common sources of PFAS exposure for consumers.

II. Health Risks Associated with PFAS in Food and Food Packaging

PFAS exposure is linked to serious, long-term health risks, including:⁸

- **Cancer** – Increased risk of kidney and breast cancers.
- **Liver damage** – PFAS accumulate in the body over time, leading to toxicity.
- **Endocrine disruption** – PFAS interfere with hormone function, impacting fertility and thyroid health.
- **Weakened immune system** – Studies have shown PFAS exposure reduces vaccine effectiveness and increases susceptibility to infections.
- **Developmental harm** – Exposure during pregnancy and childhood is linked to low birth weight, delayed development, and learning disabilities.
- **Elevated cholesterol and heart disease** – Studies indicate PFAS disrupt lipid metabolism, contributing to cardiovascular disease.

⁵ *Per- and Polyfluoroalkyl Substances (PFAS)*, U.S. FOOD & DRUG ADMIN.

<https://www.fda.gov/food/environmental-contaminants-food/and-polyfluoroalkyl-substances-pfas> (last updated Jan. 3, 2025).

⁶ Courtney Lindwall, “Forever Chemicals” Called PFAS Show Up in Your Food, Clothes, and Home, NRDC (Apr. 10, 2024), <https://www.nrdc.org/stories/forever-chemicals-called-pfas-show-your-food-clothes-and-home>; Kevin Loria, Dangerous PFAS Chemicals Are in Your Food Packaging, CONSUMER REPS., <https://www.consumerreports.org/health/food-contaminants/dangerous-pfas-chemicals-are-in-your-food-packaging-a3786252074/> (last updated Mar. 4, 2022); Drake W. Phelps, *Per- and Polyfluoroalkyl Substances in Food Packaging: Migration, Toxicity, and Management Strategies*, 58 ENV'T SCI. & TECH. 5670, 5670–78 (2024).

⁷ Arabela Ramírez Carnero et al., *Presence of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in Food Contact Materials (FCM) and Its Migration to Food*, 10 FOODS 1, 1–14 (2021).

⁸ Alessio Filippo Peritore et al., *Current Review of Increasing Animal Health Threat of Perand Polyfluoroalkyl Substances (PFAS): Harms, Limitations, and Alternatives to Manage Their Toxicity*, 24 INT'L J. OF MOLECULAR SCI.'S 1, 6–15 (2023); Katarzyna Mokra, *Endocrine Disruptor Potential of Short- and Long-Chain Perfluoroalkyl Substances (PFASs)—A Synthesis of Current Knowledge with Proposal of Molecular Mechanism*, 22 INT'L J. OF MOLECULAR SCI.'S 1, 3–8 (2021).



Given these risks, the continued use of PFAS in food packaging is unacceptable, especially when safer alternatives are available.

III. The Need for Legislative Action

Oregon must join the growing national movement to eliminate these dangerous chemicals from our food supply,⁹ particularly at a time when the federal administration seeks to severely deregulate industry of all kinds and indicates it will fail to implement environmental and public health protections enacted by Congress. HB 3512 aligns with similar legislation enacted in California, Washington, Maine, New York, and Vermont, which have already moved to prohibit PFAS in food packaging and consumer products.¹⁰

As the Committee is likely already aware, key provisions of HB 3512 will:

1. Prohibit the sale and distribution of food packaging containing intentionally¹¹ added PFAS.
2. Require manufacturers to provide certificates of compliance, ensuring accountability.
3. Empower the Attorney General to enforce the law and impose penalties for violations.

Without strong legal protections, PFAS exposure through food will continue to harm public health and disproportionately impact vulnerable communities.¹²

IV. Safer Alternatives Are Available

Opponents of HB 3512 may argue that banning PFAS in food packaging could impose financial burdens on businesses or limit consumer choices. However, the reality is that safer, cost-effective alternatives already exist and are widely used by major food

⁹ See *Policies for Addressing PFAS*, SAFER STATES, <https://www.saferstates.org/priorities/pfas/> (last visited Mar. 12, 2025).

¹⁰ See *U.S. PFAS Regulations by State for Consumer Products*, SOURCE INTELLIGENCE (Oct. 30, 2024), <https://blog.sourceintelligence.com/us-pfas-regulations-by-state>.

¹¹ Opponents of the bill testified during the public hearing that the definition of “intentionally added” is too vague, however it is worth noting that this “knew or should have known” standard is found in many other food labeling schemes.

¹² Alessio Filippo Peritore et al., *supra* note 1, at 2–3, 6–7, & 11–13; see also Maya Brownstein, *Communities of color disproportionately exposed to PFAS pollution in drinking water*, HARVARD T.H. SCH. OF PUB. HEALTH (May 15, 2023), <https://hsph.harvard.edu/news/communities-of-color-disproportionately-exposed-to-pfas-pollution-in-drinking-water/>.



retailers and packaging manufacturers.¹³ Companies like Whole Foods, Chipotle, and McDonald’s have proactively eliminated PFAS from their packaging without significant economic disruption, demonstrating that a transition is both feasible and beneficial.¹⁴ Additionally, we remind the Committee that businesses complying with Minnesota’s PFAS regulations will already meet Oregon’s standards—ensuring a smooth transition.¹⁵ HB 3512 will ensure that all food packaging sold in Oregon meets safer standards.

Conclusion

PFAS chemicals have no place in our food system. HB 3512 is a necessary and commonsense measure to protect public health, reduce toxic exposure, and hold manufacturers accountable, rather than allow externalized costs to our environment and health. Oregon has an opportunity to lead in the fight against PFAS pollution and ensure that food and food packaging sold in the state are free from these dangerous chemicals.

For these reasons, the **Center for Food Safety urges the passage of HB 3512**. Thank you for your consideration, and we welcome any questions.

Respectfully submitted,

Amy van Saun

A handwritten signature in black ink, appearing to read "Amy van Saun".

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¹³ See, e.g., *PFAS-Free Products*, PFAS CENTRAL, <https://pfascentral.org/pfas-free-products/> (last visited Mar. 12, 2025).

¹⁴ *Retailers committing to phase out PFAS as a class in food packaging and products*, TOXIC-FREE FUTURE <https://toxicfreefuture.org/mind-the-store/retailers-committing-to-phase-out-pfas-as-a-class-in-food-packaging-and-products/> (last visited Mar. 12, 2025).

¹⁵ Minn. Stat. § 116.943 (2024).