

March 30, 2026

Chair Bennett and Vice-Chairs Phillips and Carson, and members of the House Committee on Environment and Natural Resources, the Association of Home Appliance Manufacturers (AHAM), wants to provide comment on the proposed changes to H. 7734 which would amend the Consumer PFAS Ban Act of 2024 by clarifying enforcement provisions and provide the Department of Environmental Management with the authority to exempt a product or category of products from the prohibitions in the law.

AHAM members produce hundreds of millions of products each year. They design and build products at the highest levels of quality and safety. As such, they have demonstrated their commitment to strong internal safety design, monitoring, and evaluation/failure analysis systems. Together with industry design practices, test requirements, and redundant safety mechanisms PFAS chemicals play an important role in the safety profile of household appliances in their great resistance to high temperatures.

#### *Cookware*

Under the proposed bill, the cookware definition is amended to add “but is not limited to” to the listed product scope under the Consumer PFAS Ban Act of 2024. The “but is not limited to” language raises concerns about what products would be brought into this ban and could potentially include any product in the kitchen including coffee makers and several major appliances, such as your microwave, stove, and refrigerator because they “prepare, dispense, or store food.” There are risks of inconsistent interpreting and enforcement of which products would be included in the rapidly approaching 2027 PFAS cookware product prohibitions with limited time for clarity in preparation for the compliance date. Appliances are complex products with wirings, circuit boards, and numerous internal components. It is noted the Department of Environmental Management has clarified cookware on the PFAS (Per- and Polyfluoroalkyl Substances) in Consumer Products webpage stating that, “RIDEM has determined that cookware items with an electrical component are not included within this definition. For example, an electric coffee machine is not subject to the ban.”<sup>1</sup> With this clarity, we are unsure on what this new language would mean for clarity and with the compliance date set for January 1, 2027, AHAM has concern about broadening the product scope to make it challenging to know what products need to comply eight months from now.

#### *Exemptions*

AHAM supports the ability for manufacturers to submit an exemption request from the PFAS product prohibitions as there may not be any technical feasible alternatives as well as no comparable non-PFAS-added product available at reasonable cost. PFAS chemicals unique combination of durability, thermal resistance, and chemical inertness enables the production of

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<sup>1</sup> <https://dem.ri.gov/pfas-products>



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long-lasting, high-performance products. Replacing PFAS chemicals with less effective alternatives could lead to shorter product lifespans, increased material waste, and more frequent replacements; ultimately raising the environmental footprint of consumer goods. Having this exemption process will allow manufacturers to seek an exemption and for the Department of Environmental Management to do proper due diligence on the request.

Thank you for the opportunity to present this written statement to the hearing record. AHAM strongly wants to work with the Committee if this proposal moves forward. For future reference, my contact information is 202.872.5955 x328 or via electronic mail at [jkeane@aham.org](mailto:jkeane@aham.org).

*AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. AHAM members employ tens of thousands of people and produce more than 95% of the household appliances that are shipped for sale within the United States. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection. The purchase of new appliances often represents the most effective choice a consumer can make to reduce home energy use and costs.*