

March 30, 2026

The Honorable David A. Bennett
Chair, House Committee on Environment and Natural Resources
Rhode Island House of Representatives
82 Smith Street
Providence, RI 02903

RE: Written Testimony H 7734 – Amend or Oppose

Dear Chair Bennett, Vice Chair Cortvriend, and Members of the Committee:

On behalf of the National Marine Manufacturers Association (NMMA), representing the U.S. recreational boating industry, I appreciate the opportunity to provide comments on H 7734, legislation addressing the use of per- and polyfluoroalkyl substances (PFAS) in consumer products.

NMMA supports efforts to protect public health and the environment. However, we are concerned that the broad prohibition in H 7734 would inadvertently restrict or ban the use of PFAS in critical life-saving and marine safety equipment, including life jackets (personal flotation devices, or PFDs), throwable flotation cushions, and other U.S. Coast Guard-mandated gear.

As drafted, the bill prohibits the manufacture, sale, or distribution of covered products containing intentionally added PFAS beginning January 1, 2027, with only limited exemptions. The legislation does not explicitly exempt marine safety equipment or federally regulated products, creating significant unintended consequences for boating safety and compliance.

Life jackets and other marine safety equipment are not discretionary consumer products — they are federally required safety devices regulated under U.S. Coast Guard authority (Title 46, U.S. Code). These products must meet strict performance standards to function in extreme marine environments, including prolonged exposure to saltwater, UV radiation, and harsh weather conditions. As highlighted in [NMMA's comments to Washington State](#), these products must remain reliable over long periods and under demanding conditions, and currently rely on specialized materials, including PFAS, to ensure buoyancy, durability, and water resistance. In Washington, policymakers acknowledged these critical safety needs by adopting a carveout for life-saving marine equipment.

Similar to seat belts in automobiles, personal flotation devices are life-saving equipment that must perform without failure in emergency situations. Eliminating or restricting PFAS in these applications without viable, tested alternatives risks compromising product integrity and, ultimately, public safety.

In addition, the recreational boating industry plays a vital role in Rhode Island's economy. Recreational boating in the state generates approximately \$1.7 billion in annual economic impact, supports more than 7,000 jobs, and contributes to over 380 marine-related businesses. Policies that unintentionally restrict essential marine products could have ripple effects across this important sector.

NMMA respectfully requests that H 7734 be amended to explicitly exempt:

- Life-saving marine equipment regulated under U.S. Coast Guard and International Maritime Organization (IMO) standards, including personal flotation devices and throwable safety devices;
- Marine-specific textiles, coatings, and performance materials required to withstand saltwater, UV exposure, and extreme environmental conditions; and
- Recreational marine vessels and component parts, which are part of complex global supply chains with limited short-term alternatives.

Without these clarifications, the bill risks treating critical safety equipment as general consumer products or apparel, which does not reflect their regulatory status or function.

NMMA stands ready to work with the Committee to develop a practical, science-based approach to PFAS regulation that protects both environmental quality and on-water safety.

Thank you for your consideration.

Sincerely,
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