

March 12, 2023

Representative Rick Hansen
Chair
Environment and Natural Resources Finance
and Policy Committee
407 State Office Building
St. Paul, MN 55155

Representative Zack Stephenson
Chair
Commerce Finance and Policy
449 State Office Building
St. Paul, MN 55155

Representative Jeff Brand
501 State Office Building
St. Paul, MN 55155

Representative Aisha Gomez
Chair
Taxes Committee
453 State Office Building
St. Paul, MN 55155

Senator Foug Hawj
Chair
Environment, Climate, and Legacy Committee
3231 Minnesota Senate Bldg.
St. Paul, MN 55155

Senator Matt Klein
Chair
Commerce and Consumer Protection
Committee
2105 Minnesota Senate Bldg.
St. Paul, MN 55155

Senator Kelly Morrison
Assistant Majority Leader
3205 Minnesota Senate Bldg.
St. Paul, MN 55155

RE: Opposition to HF 1000 / SF 834 and HF 2586

Dear Senators and Representatives:

I am writing to express my opposition to HF 1000 - *PFAS prohibited in certain products, disclosure required, and rulemaking authorized* and its companion bill SF 834 - *PFAS in certain products prohibition* and HF 2586 – *PFAS Gross Revenues Tax*. My concerns related to the overly broad impacts of the proposed legislation and its unintended consequences on energy efficiency and greenhouse gas emissions in the State. Passing these bills will make it more difficult for Minnesota to meet its climate goals.

Minnesota is a leader in the climate and energy efficiency space. The state has committed to reducing greenhouse gas emissions by 30% by 2025 (compared to 2005 emissions) and by 80% by 2050. I am proud to be a part of the solution to our state's climate challenges. Lewis Insulation installs spray polyurethane insulation in the greater Minneapolis and St. Paul area.

Spray foam insulation is the most effective insulation on the market. It is the only product that functions as an insulation and an air barrier. This sets our products apart from other insulation products on the market. Insulating and air sealing the building envelope is the most effective solution to reducing energy demand and GHG emissions associated with commercial and residential buildings. If every home in

America was insulated with spray foam insulation it would have a similar effect as removing almost 40 million cars off the road every year.¹

HF 1000 / SF 834 and HF 2586 will negatively impact our business. **Spray foam insulation does not contain PFAS, yet it is still being regulated by these bills.** The definition of PFAS in all three bills is overly broad. HF 1000 and SF 834 would require reporting the use of certain raw materials to the state and would ban our products on January 1, 2030 or 2032. HF 2586 would tax the use of spray foam at 50%.

These bills will prohibit or tax the use of all spray foam insulation containing fluorinated foam blowing agents. These molecules are **not** bioaccumulative, toxic, or persistent in the environment. In fact, they are designed to break down to naturally occurring substances within a few days in the atmosphere. These molecules (foam blowing agents) should be exempted from the bills because they exhibit none of the chemical properties associated with the chemicals of concern in the PFAS class.

I encourage you to oppose HF 1000 / SF 834 and HF 2586 to ensure that Minnesota can continue to save homeowners money on energy bills, reduce GHG emissions from buildings, and comply with its climate goals.

Sincerely,

David M. Lamb
Lewis Insulation

¹ [Spray Foam: Contributing to Sustainability and Reducing Greenhouse Gas Emissions from Buildings](#)