Corporate Influence and the PFAS Contamination Crisis

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Abstract

This study explores the dynamics of legislative conflicts surrounding PFAS (per- and polyfluoroalkyl substances) regulation in Massachusetts, focusing on the strategies employed by industry representatives and pro-regulatory advocates giving testimony at public hearings. Through a qualitative analysis of hearing transcripts and testimonies, the study reveals two primary lobbying strategies: an appeal to a status quo bias by emphasizing economic burdens and a "splitting hairs" tactic that emphasizes scientific nuances to advocate for a risk-based approach to regulation. In contrast, pro-regulatory advocates highlighted the known risks of PFAS exposure and served as foils to industry narratives. The study highlights the strategic communication tactics used by interest groups to influence policymakers and sheds light on the complex landscape of environmental regulatory debates in Massachusetts, emphasizing the role of public interest groups in countering the influence of private interest groups.

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Introduction

PFAS are a class of chemicals domestically produced in the 1950s to manufacture water, heat, and grease resistant consumer products (OA US EPA 2016). As early as 1962, DuPont's internal reports found the chemicals were toxic to humans under certain conditions (Gaber, Bero, and Woodruff 2023). Later reports documented cases of cancer, severe birth defects among pregnant workers, the death of several scientists involved in manufacturing, among numerous other health issues. These internal reports were illegally suppressed in violation of the Toxic Substances Control Act (TSCA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Ostensibly, the EPA had no knowledge that the chemicals produced were harmful to human health and fertility. It wasn't until 2000, when a lawsuit brought by townspeople plagued by health issues from living near a manufacturing plant, that the reports were made public (Kluger 2023).

In 2006, under an agreement with the Environmental Protection Agency (EPA), eight major producers of PFAS in the United States voluntarily phased out use of certain chemicals in the class, known as PFOA, over a four year period (2016). DuPont agreed to participate in the agreement in exchange for public assurances from the EPA regarding the safety of materials containing PFOA for consumers. Despite there being no evidence of safety, the EPA agreed and released a public statement. As a result of the phase-out, certain chemicals in the PFAS class are no longer domestically produced. However, there are no import restrictions, and they continue to be produced internationally, and domestically other chemicals within the PFAS class have replaced them (Wang et al. 2015).

Although there have been long-standing environmental and health concerns about the man-made group of chemicals known as PFAS, it has only been recently that both federal and

state governments have begun to respond to the contamination, pushed by developments such as heightened scientific consensus on their environmental longevity and human health risks of this chemical class (Blum et al. 2015). Nevertheless, corporations and trade associations have continued to resist regulations at both the federal and state levels.

In January 2024, the EPA finalized a rule preventing companies from beginning or resuming manufacturing of 329 types of PFAS. In April 2024, the EPA established National Primary Drinking Water Regulation (NPDWR) for six PFAS amid ongoing opposition from industry groups including the American Chemistry Council. Additionally two common types of PFAS – PFOA and PFOS – have been newly designated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). At the Congressional level, the effectiveness of corporate lobbying in preventing PFAS regulation, research, and legal liability has been evident in the limited number of bills that have successfully transitioned into law.

Of the 50 PFAS centered bills introduced by the 177th Congress (2021-2023), only two became federal law. S.231 develops guidelines for emergency personnel to avoid unnecessary PFAS exposure and H.R.2617 designates funding for voluntary PFAS testing by agricultural manufacturers and research on the safety of PFAS in cosmetic products (Connolly 2022; Peters 2022). In comparison to the bills that failed to pass, these bills lack regulatory teeth. Despite public engagement and political will, lobbyists have been effective in preventing legislation which could hold companies liable for harm or curtail their ability to sell potentially dangerous products. The ability of private interest groups to conduct highly successful lobbyist campaigns poses a critical impediment to effectively addressing environmental challenges. My research attempts to uncover the strategies private interest groups use to influence the formulation, modification, and enforcement of per- and polyfluoroalkyl substances (PFAS)-related legislation within the context of the Massachusetts state legislature. It also includes the arguments of advocates for these laws. The study also delves into the complex dynamics and conflicts that arise when private entities exert influence in domains designed to safeguard public welfare, a phenomenon brought to the forefront by the emerging PFAS public health crisis.

Massachusetts provides an interesting legislative landscape in part due to the work done prior to the introduction of regulatory bills in 2023-24. In 2021, the PFAS Interagency Task Force, headed by House Representative Kate Hogan and Senator Julian Cyr, composed of state officials and experts was established. Over the course of a year the task force held nine public hearings from a variety of stakeholders including advocacy, environmental, and industry groups, as well as legislators and others. In April 2022, the PFAS Interagency Task Force published its final report which detailed, among other things, recommendations for state PFAS legislation. Much of the testimony and arguments presented by many industry groups in later legislative hearings, are speaking points that were likely to have already been heard by legislators (Julian Cyr and Kate Hogan 2022).

My research focuses on the lobbying tactics used by major organizations representing corporate interests, and their impact on legislative processes in Massachusetts, ultimately influencing the trajectory of the PFAS contamination crisis. Moreover, this study reveals insights into how corporations leverage institutions that are ostensibly designed to promote public welfare, in order to advance private interests. This is often at the expense of public interests—especially in the realm of public health. The ongoing actions of private interest groups provide a good opportunity to scrutinize the role these entities play in influencing public health policies that are meant to protect public welfare, particularly during a time when concerns about a contamination-driven public health crisis are escalating.

Literature

There is a wide-ranging body of literature on the considerable influence of lobbying groups in shaping governmental policies and in some cases achieving regulatory capture. Regulatory capture is a situation in which a government agency, tasked with regulating a particular industry or sector, ends up being unduly influenced by the entities it is supposed to oversee. This influence can result in the agency acting in ways that benefit the industry rather than serving the public interest (Tai 2017). The United States has a high prevalence of climate denialism, pro-industry regulations, and skepticism surrounding scientific findings, in comparison to countries in the European Union (Supran, Rahmstorf, and Oreskes 2023).

This divergence can be explained, in part, by the power of lobbying groups and their use of effective strategies (Brulle 2018). Discourse in the literature is mainly centered on tactics used by tobacco, fossil fuel, and chemical industries. The concept of "manufacturing doubt," as exemplified in the seminal work *Merchants of Doubt* by Oreskes and Conway (2010), serves as a crucial lens through which to understand the deliberate manipulation of public perception and policy-making processes. In the cases identified by Oreskes and Conway, scientific experts were paid by corporations to publicly undermine the credibility of research which had conclusions contrary to the industry narrative, encouraging the public to treat these accounts with skepticism. Additionally, smear campaigns, extensive public relations management, and political involvement has allowed these companies to survive and thrive despite their transgressions (Oreskes 2010).

Further research on the subject of "manufacturing doubt" has uncovered a misinformation strategy employed by corporations that has been coined "engineering science" (Brandt 2012). Corporate engineering of science is described as efforts to disrupt normative science and the production of knowledge. This involves building a network of special interests within a field of science. Scientists who express skepticism to findings developed with normal science are financially supported by corporations. Additionally companies have developed research programs and partnered with university scientists to engineer findings that disrupt and dispute problematic findings from normal science which undermine their businesses. When corporate interests contradict established fact in the fields of health, medicine, science, engineering science has been a go-to strategy to maintain public relations and deflect legislative interest (Brandt 2012).

Moreover, researchers have found that companies take a multifaceted approach to influencing legislation. This approach includes not only "insider strategies," such as utilizing paid lobbyists and contributing to Political Action Committees (PACs), but also "outsider strategies" involving the sponsorship of public engagement campaigns via mail, phone, and other channels to create the perception of broad public support for initiatives benefiting private interests (Walker 2012). For the purpose of my research, particular focus will be paid to insider strategies such as the testimony of lobbyists representing private interests during public hearings.

Literature on insider lobbying strategies reveals how industries leverage political pressure within an adaptive governance framework to emphasize status quo bias (Hong and Lee 2018) and influence legislative outcomes. This strategy involves emphasizing potential disruptions to profitable industries and underscoring uncertainties associated with regulatory action. Industry lobbyists highlight perceived negative unintended consequences or economic impacts of proposed changes to instill caution among policymakers, arguing that current regulations are sufficient or that modifications will harm businesses, consumers, or other stakeholders. This strategy allows industries to enjoy "policy monopolies" constructed through appeals to private economic interests over public interests, often hindering regulatory responsiveness to emerging issues (Hong and Lee 2018).

Researchers have also explored lobbying as a form of legislative subsidy, moving beyond traditional views of exchange or persuasion. By conceptualizing lobbying as a mutual support mechanism between lobbyists and strategically chosen legislators aimed at advancing shared objectives, this approach emphasizes collaboration over direct persuasion. Here, the emphasis is on supporting like-minded legislators rather than solely attempting to change individual minds (Hall and Deardorff 2006).

The literature contains theoretical frameworks which present underlying rationales for environmental regulation, including the precautionary principle and a risk-based approach. The precautionary principle has been explained by researcher Nelta Edwards (2008). In an environmental context, the precautionary principle refers to exercising prudence when dealing with potential hazards. This manifests in a "better safe than sorry" approach which prohibits the release of potentially dangerous material into a community until its safety is definitively proven (Edwards 2008). The European Commission formally adopted the precautionary principle in 2000, as part of its risk analysis determination to establish policies which maintain appropriate levels of protection in environmental and health matters (European Commission 2002).

The precautionary principle has gained traction in discussions surrounding PFAS management, aligning with broader environmental concerns about the potential risks posed by these substances. Scholars emphasize the need to prioritize caution and preventive action in the

face of uncertainty regarding PFAS safety (Blum et al. 2015). However, this perspective conflicts directly with existing EPA regulatory practices and the risk-based philosophy advocated for by chemical industry groups (Blum et al. 2015; Cousins et al. 2016).

Risk-based regulation emphasizes governance efficiency by regulating proportionally to assessed risks. Proponents argue that this approach contributes to effective use of resources and facilitates economic growth by not overly stymying or burdening innovating industries. However, critics highlight challenges to risk-based governance, which in the U.S. relies on voluntary reporting and lacks precautionary safeguards. This tension between precautionary principles and risk-based governance is significant in shaping environmental policy decisions and regulatory outcomes related to PFAS management (Rothstein et al. 2006).

Other salient areas of focus in the literature on regulation revolve around the themes of persuasion and communication. The Generalizing Persuasion (GP) framework delineates four key dimensions of persuasion in political contexts: actors/speakers, medium of dissemination, identity of the audience, and setting (Druckman 2022). Specifically addressing the dimension of "actors," the GP framework builds upon previous research on "opinion leaders." This phenomenon involves typical voters delegating or encouraging individuals—often experts or politicians—due to their perceived knowledge and/or shared demographic characteristics, to participate in discussions while the voters themselves predominantly refrain from active participation. Though they often lack official titles, opinion leaders wield significant influence through their well-connected positions within social networks, enabling them to expedite the dissemination of trustworthy information within their communities (van Eck, Jager, and Leeflang 2011). Examples of such opinion leaders include community activists, academic experts, and influential public figures (Druckman 2022; Minozzi et al. 2019).

Most literature on political persuasion focuses on how political candidates gather support during their election campaigns, often interpreting persuasion as a one-way transmission from actor to audience. However, some models attempt to analyze how audiences engage with messages from political actors. The Dual-Process model determines outcomes by assessing the level of effort the receiver makes to interpret the message, a high effort action involves attempting to comprehend the content of the message, while a low effort action entails relying on the perceived credibility of the actor (Xu 2017). This model is particularly salient in contextualizing the interactions between lobbyists and congresspersons during public hearings.

The GP framework prompts an understanding of the interplay between opinion leader actors and the audience, expanding the scope of political persuasion theory to view persuasion as an intricate and ongoing exchange among actors. When examining testimony scenarios, both industry lobbyists and public interest groups are classified as actors in this framework. However, when they listen to testimony during a hearing, they transition into the role of receivers or the audience. Moreover, they actively participate in exchanges with Congresspeople responding to questions or providing clarifications. Congressional Committee members play a dual role in this exchange, primarily serving as the audience while occasionally taking on the role of interrogatory actors.

Methods

To study the legislative landscape surrounding chemical regulation, this study undertakes a comprehensive analysis of bills relating to PFAS introduced in the Massachusetts state legislature during the 192nd and 193rd General Court of the Commonwealth, spanning the years 2023-2024. The initial data collection phase began by searching for three key terms—PFAS, perand polyfluoroalkyl, and toxic—on the Malegislature.gov website. These terms were selected based on insights from the literature and refined through iterative testing on the website until a standardized process was established.

In addition to a title, bills are allocated a unique docket number, beginning with either S. or H., depending on whether they were introduced in the Senate or House. While multiple bills may share the same title, each bill's number is distinct. The state website provides information on bills, such as their name, number, sponsor, status, a copy of the bill itself, and a list of similar or related bills.

Using a filter available on the website, the search was refined to display only bills containing these terms, thus excluding amendments, existing laws, etc. which fall outside the scope of this research. The search function on the state legislature website appeared to only produce Bills with one or more of the three terms (PFAS, per- and polyfluoroalkyl, and toxic) exclusively within the title of the bill, rather than within the body or text of the bill itself. This initial search yielded a dataset of 13 bills.

To find other bills relevant to PFAS regulation but that did not use any of the three terms in the title, a complementary search using the website Bill Track 50 was conducted. The website, a product of LegiNation, provides real-time legislative tracking at both state and federal levels in the United States. This platform enables a more comprehensive search by allowing users to look for specific terms within the body of the bill as well as in the title. Employing the same three terms, and filtering for Massachusetts bills yielded an additional 15 relevant bills. After confirming that the bills were introduced during the 2023-24 legislative session by searching their bill numbers on the state legislature website and viewing their histories, I added them to my sample. Ultimately, this approach resulted in a total of 28 bills to study. I believe that these 28 bills are an exhaustive sample of bills related to PFAS in Massachusetts during the 2023 year. Bill collection ended in February 2024 due to the thesis calendar.

The content of the 28 bills ranges widely in terms of their purpose (ex. funding, research order, regulation, ban, etc.), which committee they were introduced in, etc. All bills were favorable to regulating PFAS; none argued for de-regulation or relaxed regulation of these chemicals.

To ensure the relevance of the bills to PFAS and their suitability for addressing my research questions, each bill's text was reviewed on the MA Legislature website. From the original 28 bills, 19 were selected for analysis [see Appendix p 44]. These selections were made based on several criteria: how directly relevant the bill is to PFAS regulation, its potential for advancement beyond the public hearing stage, the nature of proposed actions (such as funding, regulation, or bans) and my assessment of the likelihood of attracting attention from private interest lobbyists. These assessments were made based on a reading of the bill's text and insights from the literature.

Once bills are introduced, they are referred to an appropriate committee for study and review. The committee then schedules a hearing that is open to the public and is live streamed. Any member of the public is permitted to register to testify either in person or via Zoom and also has the option to submit written testimony before or immediately after the public hearing. Oral testimony is limited to three minutes and the time limit is consistently enforced. For the purposes of this research, I did not seek to obtain any written testimony submitted by testifiers. The recording of the hearing is available to view on the state legislature website. By downloading the video of the hearings and uploading them to Trint, a transcription service, I was able to obtain transcripts for the hearings.

To analyze the transcripts, a coding framework was developed through two waves of coding on Dedoose. The initial wave was done to isolate relevant sections of the transcripts, all of which also included testimony on unrelated bills (hearings generally include multiple bills). Making a new document with the isolated relevant sections, a second wave of coding was applied. This wave of coding was conducted to differentiate testimony from public and private interest groups and legislators/politicians as well as to identify common themes, references, and arguments used by the testifier [see Appendix p.45]. Information from the literature review, and a reading of the bill text as introduced was used in conjunction with the iterative coding process to develop the framework. The result was testimony on the bills in the dataset coded to reflect who was testifying and what strategies were used in their testimony.

Section II

Bill Categorization

In the original sample, there are 10 bills classified as "sneaky bills" [see Appendix p.42]. This designation applies to bills whose intentions regarding PFAS regulation are suspected to be deliberately ambiguous for the purpose of avoiding industry scrutiny and improving the chances of the bill's passage. For example, Massachusetts Bills S2057 and H3948 share the same title: "An Act prohibiting state and municipal contracts for the purchase and installation of artificial turf fields". However, Bill S2057, introduced by Senator Marc R. Pacheco, does not mention any key terms such as PFAS, per- and polyfluoroalkyl, or toxic. But, H3948, introduced by Representative Carmine Lawrence, which proposes to amend Chapter 29 (the state finance section) of the General Laws, employs terms like perfluoroalkyl, polyfluoroalkyl, and PFAS within the body of the text.

S2057:

No municipality, including, but not limited to, any school district, state department, or state agency, shall enter a contract for the purchase, use, or installation of artificial turf for a new or existing field. Artificial turf fields that have been already installed may remain in use, but shall not be replaced with artificial turf.

H3948:

No state agency or state authority shall provide funding for the purchase, use or installation of artificial turf that contains zinc, plastic or *perfluoroalkyl* and *polyfluoroalkyl substances (PFAS)* for any new or existing field after October 1, 2023. Any artificial turf field containing zinc, plastic or *PFAS* that is in use prior to October 1, 2023 shall be allowed to be used for its useful life but shall not be replaced with artificial turf containing zinc, plastic or *PFAS*." (Terms bolded by researcher)

I suspect Bill S2057 deliberately omits the use of these keywords to avoid scrutiny from anti-regulatory lobbyists. Not all 10 "sneaky bills" were selected in the 16 bills for analysis. Additionally, S2057 and H3948 are categorized as companion bills. "Companion bills" are sometimes referred to as a "duplicate bill". These bills share the same titles and though some have identical text, there can also be small discrepancies as was the case with S2057 and H3948 [see Appendix p.43]. The majority of these bills are referred to the same joint committee and are heard in the same public hearing, but there are exceptions. For example, Bills S1559 and H2317, both titled: "Relative to the establishment of the PFAS Research and Development Public Safety Fund," were referred to the Joint Committee on Public Safety and Homeland Security but scheduled for separate public hearings. It is also possible that companion bills are referred to different joint committees, in which case they could not share a public hearing.

A bill may have a companion bill for various reasons. Typically, having two similar bills increases the likelihood of at least one bill passing if the other fails. Additionally, companion bills streamline the legislative process, reducing the time required for both bills to pass compared to an iterative introduction. Since companion bills are introduced in both the House and Senate,

they also demonstrate bicameral support for that particular measure or position. For these reasons, some states, like Tennessee, mandate that all bills have a companion bill (BillTrack 50 2021).

Analysis

In my analysis of the public hearing transcripts, testifiers fell into one of three general categories in relation to the bill. Those opposing the bill, those in support of the bill, and legislators or government officials promoting the passage of the bill. In the hearings analyzed, all the testifiers opposing the bill identified themselves as part of an industry trade group, thus they are referred to as "Industry Groups" and can also be classified as industry lobbyists. Those who testified in support of the bill ranged widely and came from environmental organizations, labor unions, local students, and others. This group is referred to as "Public Interest Groups". Though all legislators who testified did so in support of the bill, their rhetoric and roles within the hearing process were distinct from those of the public interest groups. In this analysis they are referred to as "Legislators."

Industry Groups

Four major trade organizations gave testimony opposing the progression of at least one of the bills in the sample. Representatives from the American Chemistry Council, PFAS Action Network, Massachusetts Medical Device Industry Council (MassMEDIC), and all gave testimony on at least two separate occasions. A representative for the Advanced Medical Technology Association testified in one hearing. The testimony presented by these industry groups exhibited a remarkable degree of uniformity both within organizations and across the four groups, aligning with expected patterns described in the literature on lobbying tactics. Furthermore, the strategies employed by these industry groups closely mirrored historical tactics discussed in the literature on lobbying practices.

The two main strategies which are present in the transcripts are an appeal to a status quo bias by emphasizing the economic burdens of regulation, and advocating for a risk-based policy through a "splitting hairs" approach to PFAS regulation. I call this the "splitting hairs" tactic because the strategy involves emphasizing the minor distinctions or nuances in the scientific understanding of PFAS, which are insignificant when considering the known risks. By drawing attention to technical interpretations of scientific data, lobbyists aim to create uncertainty and skepticism around the need for comprehensive regulation.

Risk-Based Evaluation

In addition to advocating for a risk-based approach that avoids regulating all PFAS chemicals, private interest groups employ a "splitting hairs" argument, emphasizing the differences among PFAS compounds. This strategy aims to secure exemptions or loopholes that could enable continued production, manufacturing, or distribution of PFAS should the bill pass despite their opposition.

One consistent talking point was the "overly broad" scope of the bills. In particular, industry groups consistently took issue with the way PFAS are defined in the bills. Industry representatives emphasized the expansive scope of the PFAS class and the multitude of chemicals encompassed within it. They made the claim that due to the majority of chemicals in the PFAS class being untested, it would be imprudent to pass laws regulating them all as a single class. This question is connected to the basic regulatory frame—risk-based or precautionary. While industry representatives sometimes did openly advocate for a risk-based approach, more often their testimony included coded language alluding to this strategy. Promoting a risk-based

approach, in place of a hazard-based or precautionary one, is a common tactic used by industry lobbyists detailed in the literature.

The language of regulatory bills that contain a definition for PFAS chemicals in the sample define a PFAS as "A class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom". This definition is comparatively broad in relation to the federal definition. However, it is in line with the recommendation given by the Interagency PFAS Task force which suggests "To reduce the risk of regrettable substitutions, the state could take a class-based approach to regulating PFAS in consumer products and define PFAS as "fluorinated organic chemicals containing at least one fully fluorinated carbon atom." (Julian Cyr and Kate Hogan 2022). As explained in the report, the ethos of taking a class-based approach is to take a proactive (i.e. precautionary) measure as opposed to the reactive approach advocated for by industry representatives.

On June 7th, 2023 representing the ACC, Jay West gave testimony to the Joint Committee On Public Safety and Homeland Security opposing the passage of companion bills S1502 and S.1556, An Act relative to the reduction of certain toxic chemicals in firefighter personal protective equipment:

The bills treat PFAS as a single substance, even though the term PFAS encompasses a diverse group of compounds with very different chemical and biological properties. And the term PFAS itself does not inform whether a substance is potentially harmful or not. It simply means that molecules covered by the term share a similar structural trait, but it doesn't speak to anything like toxicity, environmental fate and bioavailability among the diverse family of fast compounds...

Shawn Swearingen, a representative of the Alliance for Telomer Chemistry Stewardship (ATCS), a trade group within the ACC, testified to the same effect at a later hearing. On June 21, 2023 he gave testimony to the Joint Committee for Public Health in opposition to the passage of

S1431, An Act relative to chemicals in food packaging, and companion bills H2197 and S1356,

An Act to protect Massachusetts public health from PFAS.

Our mission is to promote the responsible production, use, and management of PFAS based products while also advocating for sound science and **risk based approach** to regulation. On behalf of the members of ATCS, we respectfully oppose. Uh H2197 Senate 1316, and uh S1431 as written...The chemical industry supports a **comprehensive approach to managing per and polyfluoroalkyl substances**. That helps to ensure protection of human health and the environment. While agreeing with the intent of the legislation, of all three bills in some areas of the measures there are definitions, timelines, and inconsistencies with other states and federal agencies are concerning. Um, H2197, like the main law, is **overly broad in scope** and will likely capture hundreds of thousands of products, uh, most of which do not present significant risk concerns, rather than focusing on the PFAS chemistries of products that present the greatest potential risk concerns... (Terms bolded by researcher)

In the same hearing, Brian Johnson of the Massachusetts Medical Device Industry

Council (MassMEDIC) also testified in opposition to the passage of H2197, An Act to protect

Massachusetts public health from PFAS. (Companion bill to S1356):

As with this bill, the EPA currently includes 12,000 substances that fall into the PFAs classification, with each compound within the class containing different physical, chemical properties and different uses is not scientifically accurate or appropriate to group all these substances together or treat them all the same. PFAS are defined based on small chemical structural elements that apply to a broad range of substances with such diverse properties and effects that it is impractical to regulate them as a single class...

Andrew Bremis of the PFAS Action Network (SPAN) also testified in opposition of

S1356, An Act to protect Massachusetts public health from PFAS. (Companion bill to H2197) in

the same hearing:

An effective approach must begin with an appropriate and precise definition of covered PFAs that narrows compounds, um, that need to be regulated and allows us to go faster than the one by one compound approach. Over 10,000 compounds will be included as PFAs under the definition in 1356, only a portion of which are used in commerce. Any PFAS management programs should be targeted at commercially active compounds that pose the greatest risk to health and environment. We want to work with you and the federal government to do that. The right definition of fast is essential and should be

narrowed to more accurately reflect the nature of PFAs usage in the economy. We would suggest defining fast as two fully fluorinated carbon ABS. This narrower definition will help Massachusetts employers comply with the statute and help state regulators more effectively identify compounds responsible for contamination issues.

Status Quo Bias

Industry representatives also opposed certain bills on the grounds that they would impose a significant economic burden and/or be unfair to consumers who rely on their products. Often, industry representatives cited a perceived lack of alternatives and the uncertain risks associated with chemicals within the class to argue for a substantially reduced regulatory approach. This is a tactic which appeals to status quo bias. The use of a status quo bias as a lobbying strategy aligns with the idea of appearing to adapt to changing circumstances while actually advocating for the preservation of existing practices or regulations (Hong and Lee 2018; Lang, Weir, and

Pearson-Merkowitz 2021)

On June 21, 2023, Roxy Kozyckyj on behalf of the Advanced Medical Technology Association (AvaMed) testified before the Joint Committee for Public Health, in opposition to companion Bills S1356 and H2197.

Most importantly, we want to ensure this bill takes steps to avoid unreasonably and unnecessarily restricting patient access to essential products like pacemakers, insulin pumps, mammography machines, catheters and prosthetics. I appreciate hearing earlier from Chair Cyr that the intent is not to target these products. So if that's the case, I respectfully request the committee use this bill as a starting point and make common sense changes, specifically exempting FDA regulated medical devices and medical products . . . Currently, there are no commercially available alternatives to fluoropolymers in medical applications. If a viable alternative were to be found and tested, any substitutions in the device or package are subject to resubmission for the FDA to the FDA for approval. Further restricting patient access to proper health care and preventing providers from treating their patients appropriately. (Quotation abridged by researcher)

In the same hearing, Brian Johnson of MassMEDIC gave testimony in opposition to the

passage of H2197, by emphasizing the economic importance of the industry represented by

MassMEDIC as well as potential compliance issues endemic to newly regulated substances.

The medical technology industry is critical to the Massachusetts life sciences ecosystem and the economy of the Commonwealth at large. The nearly 500 medical device companies in the Commonwealth contribute more than 25,000 direct jobs, with an average salary of nearly \$150,000 a year, more than \$7.6 billion in state revenues and about 1.7 billion in state payroll . . . Due to the supply chain complexity. It's 8 to 10 layers deep for complex medical systems. It can take years for information to propagate up the supply chain, and to become aware of the occurrence of newly regulated substances by the medical device manufacturer. Manufacturers are beholden to the information that their suppliers provide, which is not always a consistent or standard readout of the materials in the product. Even with the already established environmental regulations on certain chemicals, it may take medical device manufacturers upwards of several years to even identify where in the supply chain those occur before they can attempt to mitigate and change the process. (Quotation abridged by researcher)

Andrew Bremis of the PFAS Action Network also gave testimony in opposition to S1356,

citing the necessity of manufacturing PFAS to support national economic growth and combat

climate change.

We advocate for responsible policies that will assure human health and environmental protection, while recognizing the critical need for certain PFAS materials as contributors to US economic growth, and especially the technology necessary to combat climate change. This is a complex issue, and we appreciate the committee, uh, holding a hearing to consider the right and legislative approach.

This strategy aligns PFAS production with valorized concepts like the economy, business, jobs, and combating climate change, framing PFAS as essential contributors to these goals. This tactic attempts to appeal to legislators who may be reluctant to jeopardize economic growth while also suggesting a conflict between the goals of those advocating for toxics regulation and those advocating for climate change action. Bremis' reference to climate change within the context of defending PFAS underscores a broader pattern of industry groups leveraging shared

social values to further their interests and justify continued production of potentially harmful substances. Referring to valorized concepts or groups is one tactic designed to avoid changes to the status quo.

Another tactic in appealing to status quo bias involves referencing legislation passed by other states or suggesting that Massachusetts regulators refrain from enacting regulatory measures that could conflict or become redundant with the establishment of federal standards. This tactic aims to influence policymakers by suggesting alignment with existing practices elsewhere and emphasizing potential risks associated with diverging from established regulatory frameworks.

Roxy Kozyckyj's testimony on behalf of AvaMed included references to regulations that were passed or being considered by other states with exceptions for medical devices.

In closing, uh, AvaMed understands the gravity of the work before the committee on this issue. Minnesota has already exempted FDA regulated medical devices and products in its most recent past law, and New Jersey is moving to do the same. Leaving exemptions to the agency level for critical products like these are not, that are not part of the problem, puts patients in the crosshairs of an uncertain rulemaking process that only serves to undermine FDA authority and ultimately put health care, uh, access at risk for patients in Massachusetts.

In his testimony opposing S1356, Andrew Bremis of the PFAS Action Network also referenced legislation passed in other states as a cautionary tale of what Massachusetts should avoid in its regulatory approach. He also advocated for Massachusetts to adopt the same exceptions currently present at the federal level.

The class-wide approach, which is how we would characterize the current expansive definition, has been adopted in Maine, where it has led to significant noncompliance and confusion about reporting responsibility. This has hampered the ability of the program in Maine to identify and remediate contamination issues, because of the interconnectedness of our economy. PFAS management is best led through uniform federal approach . . . Uh, we would also encourage, um, the legislation to include, um, considerations for federal

approved federal uses, such as compounds uh, approved under the Clean Air Act, the Toxic Substances Control Act, and other pieces of legislation that have been, um, updated and amended since their passage. (Quotation abridged by researcher)

In his testimony opposing S1431, Sean Swearingen of the ACC cited both California's

failure to pass a similar bill and potential future federal guidance as reasons to amend or prevent

the passage of the Bill.

We note in this regard that California did pass a similar reporting bill last session that is ultimately vetoed by Governor Newsom, who cited the steep burdens of implementing the statute as well as redundancy with forthcoming EPA reporting regulations, which are currently under OMB review and expect to be published within weeks. In regards to the PFAS food packaging. Um. This is already regulated through the federal, uh, level by the FDA before a chemical used in food packaging can be sold or distributed in commerce. It must be reviewed by the authorized by the FDA. Based on a conclusion that there's sufficient scientific data to demonstrate the substance is safe for its intended use of packaging. The FDA has already begun, uh, voluntary phase out on a PFAS and pulp based food packaging that is effective at the end of this year. Other states have passed legislation reflecting the FDA phase out timeline, including Washington state, with the Safer alternatives process.

It's noteworthy that, at least with regard to the ACC, industry appeals to Massachusetts

legislators to defer PFAS regulations to the federal government seems contradictory to their

broader lobbying efforts. In fact, the ACC's website explicitly states opposition to the EPA's

current approach to regulating PFAS chemicals.

Broadly, ACC argues that the NPDWR must be based in sound science and realistic economic data, which the proposal currently fails to do. Among additional points raised, ACC argues: EPA has relied on an assessment of potential health effects that is fundamentally flawed; overstates the non-cancer risks associated with PFOA and PFOS exposure; fails to demonstrate that the benefits of the proposal justify the costs as required by the Safe Drinking Water Act; and significantly underestimated the costs of complying with the proposed standard and the number of systems that will be impacted. (American Chemistry Council 2023)

Another direct contradiction between representative Sean Swearingen's testimony and the ACCs official position can also be found on the ACC website. On Friday April 19th, the EPA listed PFAS – PFOA and PFOS – as hazardous under the Superfund Law (EPA 2024). This imposes new reporting requirements on companies should a leak occur and also makes the companies liable for cleanups if needed. In a statement provided to the Washington Post, an ACC spokesperson spoke against this decision stating: "CERCLA is an expensive, ineffective, and unworkable means to achieve remediation for these chemicals" (Joselow and Dennis 2024).

Public Interest Groups

When examining testimonies in support of a bill versus opposition by industry representatives, a notable contrast emerges in the breadth of people and groups represented. As noted above, there were only four industry groups which sent representatives to give testimony in opposition to the bills: the American Chemistry Association, Massachusetts Medical Device Industry Council, the Advanced Medical Technology Association, and PFAS Action Network. These groups appeared to focus on specific bills and did not testify at all the public hearings studied here [Appendix p.46].

On the other hand, public interest groups supporting the bills represented a diverse array of professions, organizations, and motivations for testifying. Environmental advocacy groups such as the Silent Spring Institute, Clean Water Action, Environment Massachusetts, the Massachusetts Sierra Club, Clean Production Action, Slingshot and others supported the bills at hearings. Health-focused organizations such as the Mass Breast Cancer Coalition, Greater Boston Physicians for Social Responsibility, and others were among those advocating for the legislation. Other testifiers included individuals who were not obviously affiliated with environmental or health organizations but were affected by PFAS contamination. These testifiers included high school and graduate students, university professors, doctors, and others. While the four industry groups testified at a select number of hearings, every public hearing in the dataset included testimony in favor of the bill from one of the public interest groups.

Though public interest group testifiers pursued persuasion tactics distinct from industry groups, they shared certain commonalities within their own group. For instance, they often emphasized highly valued populations with whom they had personal relationships. These groups draw upon personal anecdotes and stories to underscore the human impact of inadequate regulation and the urgency of action. Testifiers from public interest groups also appeared to serve as more effective opinion leaders than testifiers from industry groups. From a demographic perspective, nearly all the testifiers were locally based and emphasized their personal stakes in PFAS regulation, something which was absent in the industry group testimonies. Additionally, many of the public interest group testifiers were members of the scientific community and leveraged their professional credibility in their testimony. Importantly, these groups also directly reacted and responded to testimony given by industry representatives, aligning themselves with the legislators who are testifying and holding the public hearing.

Highly Valorized Groups

Industry representatives consistently highlighted the potential economic impacts of PFAS regulation while simultaneously casting doubt on the dangers of the chemicals. Sometimes these concerns were framed in terms of their potential effects on highly valued populations such as firefighters, doctors, and ill patients, who could suffer if PFAS were to be regulated. Pro-regulatory testifiers often used personal anecdotes involving the *same* groups, but to draw opposite conclusions.

By cautioning about potential impacts on medical care or compromised firefighting protective equipment due to PFAS exposure, industry groups adopted a narrative that mirrors the protective and caring tone often delivered by public interest groups. This analysis does not suggest a causal relationship; rather, it highlights how many interest groups can leverage concerns for valorized populations to advance distinct agendas. While advocating for these valued groups seems to be an extension of industry's appeal to a status quo bias, it also shows that industry groups avoid discussing the human toll of unregulated PFAS in favor of drawing focus to the hypothetical impacts of regulation even when confronted directly with testimonies highlighting actual consequences of PFAS exposure.

On June 12, 2023 Dr. Brita Lundberg of the physician led non-profit, Greater Boston Physicians for Social Responsibility, testified in support of companion Bills S175 and H318 "An act relative to toxic-free kids".

Thanks to the work of the National Academy of Sciences and many others, we know that children are uniquely vulnerable to these chemicals much more so than adults. They have greater exposure, they absorb more relative to their body weight, they're less able to metabolize and excrete them, and they have more time than adults to develop the chronic diseases that these harmful exposures can trigger. We understand the association between exposure to certain environmental chemicals and developmental disabilities and cancers that now affect millions of American children. The societal and economic costs of these health impacts are immense. There is an assumption, one that I shared as a parent, that children's toys and products have been screened for harmful chemicals, and that it would be against the law to use such chemicals in these products. But this is not at all the case. Children's products can contain harmful chemicals like IQ lowering neurotoxins, lead and cadmium, the known carcinogens formaldehyde, PFAS and asbestos, and the endocrine disruptors bisphenol and the phthalates.

Testimony from medical professionals like Dr. Lundberg serves to counter industry narratives that emphasize the uncertainty that PFAS are dangerous. Dr. Lundberg speaks in clear terms about known dangers of childhood PFAS exposure and identifies potential avenues of exposure that the Bills will eliminate. Additionally, Dr. Lundberg identifies herself as a parent, framing her compassionate appeal to protect children from exposure as a personal one. By centering the issue around children's health, medical advocates leveraged a desire to protect a valorized population with the authority of experts, stepping into the role of opinion leaders during their testimonies.

Other testifiers within the public interest group included scientific experts from environmental groups such as Dr. Laurel Shaider from the Silent Spring Institute. Dr. Shaider testified in support of companion Bills H2197 and S1356, "An act to protect Massachusetts public health from PFAS" Dr. Shaider also utilized a protective narrative while extensively discussing the known dangers of PFAS exposure, directly countering the narratives of uncertainty proposed by industry testifiers.

I'm a senior scientist at Silent Spring Institute with a Ph.D. in environmental engineering. Silent Spring is an independent research organization and a national leader in studies investigating links between everyday chemicals and health. Our work is funded by the National Science Foundation, EPA, CDC, among others. I currently lead three federally funded studies on environmental transport, exposure and health effects of PFAS. I'd like to share five key points based on my own scientific research and other published studies. First, PFAS are linked to many adverse health outcomes. These include multiple types of cancer, reproductive, developmental and immune toxicity and impaired lactation. People have also been found to impair mammary gland development, which may lead to increased susceptibility to breast cancer later in life. Children may be especially vulnerable to these harmful effects.

Firefighters were a frequent topic of discussion in the hearings. Bills S1502 and S.1556 (and H.2339 which is a companion bill not mentioned by name in the testimony), "An Act relative to the reduction of certain toxic chemicals in firefighter personal protective equipment" prohibits manufacturers or sellers of firefighting equipment from making, selling, or distributing firefighting protective equipment that contains intentionally added PFAS chemicals. Intentionally added PFAS chemicals are defined as "the addition of a chemical to a final product or product component for the purpose of providing a specific characteristic, appearance or quality or to perform a specific function in the product or product component, including PFAS that are intentional chemical breakdown products or derivatives of an added chemical that also have a specific function in the product or product component." (S.1356, 2023).

As part of his June 7th, 2023 testimony in opposition to S1502 and S.1556, Jay West of the ACC cited potential negative impacts of PFAS regulation on firefighter protective gear.

Fluorotelomeres are another type of PFAS that are used in durable water repellent treatments on the outer shells of turnout gear, which are necessary to help repel water and protect, more importantly, against harsh hazardous liquids or other chemicals that a firefighter can encounter. Flurotelomeres also help preserve gear by providing exceptional durability, enhancing their functionality and their resistance to degradation caused by heat, chemicals and the many other stressors that can be encountered during a fire. Fluoropolymers that I mentioned before meet internationally accepted criteria to be considered polymers of low concern to human health in the environment . . . we are concerned that removing PFAS from PPE may actually make it less protective. (Quotation abridged by researcher)

This is a direct contradiction to the testimony of Richard Cannon, delivered an hour

before West's testimony in the same public hearing. Cannon, who is the president of the

Professional Firefighters of Massachusetts, a labor union representing roughly 12000 firefighters

and EMTs in MA, testified in support of Bills S1502 and S.1556.

What I will say is that PFAS chemicals exist. They're known carcinogens and firefighters are exposed to PFAS and other harmful carcinogens at a much greater rate than the general public. For years, we thought we were just exposed to toxic chemicals at the scene of an active fire or incident. But as science has evolved, it turns out we are exposed to PFAS chemicals every time we put on our turnout gear . . . The fact is we're required to wear it. We don't have another option right now. We wear this contaminated gear in people's houses as we respond throughout the Commonwealth and in public buildings. I worked last night, I wore this coat [*gesturing to a firefighting coat on the table*] into people's houses as we assisted them in their emergencies. Right now, there are firefighters

across the state responding to emergencies, wearing gear just like this. (Italicized description added by researcher; quotation abridged by researcher)

Richard Cannon's testimony as the president of the Professional Firefighters of Massachusetts aligns well with the role of opinion leaders within the Generalizing Persuasion (GP) framework. Cannon represents a significant group of highly valorized individuals, and speaks with authority and experience derived from his position as both president and an active firefighter. In the GP framework, opinion leaders are individuals who wield influence and authority due to their perceived knowledge, demographic alignment, or role in specific communities. Cannon's testimony reflects his cognizance of his authority he advocates for the interests of firefighters, articulating the challenges and risks they face with PFAS exposure. His testimony distinguishes between unpreventable risks and preventable ones: "For years, we thought we were just exposed to toxic chemicals at the scene of an active fire or incident. But as science has evolved, it turns out we are exposed to PFAS chemicals every time we put on our turnout gear." Cannon articulates that while firefighters accept an expected and unavoidable level of risk when they are on the job, the PFAS exposure from their protective gear was both unexpected and, he believes, avoidable risk. While he did not discuss the availability of alternatives in his testimony, Cannon emphasizes the urgent need to mitigate this particular risk to firefighter health and safety.

Cannon's authoritative stance and firsthand experience serve as a counterpoint to the hypothetical situations used by industry groups to appeal to status quo biases and promote a risk-based evaluation. This juxtaposition highlights the real-world implications of PFAS exposure faced by firefighters, which contrasts with the speculative arguments used by industry groups to keep existing regulatory practices. This aligns with the GP framework's emphasis on

actors/speakers who possess credibility and influence, crucial elements in shaping legislative perspectives and public opinion.

The juxtaposition between Richard Cannon's testimony (and other firefighters who testified in the hearing) and ACC representative Jay West's testimony did not go unnoticed. Representative Carlos González, chair of the Joint Committee on Public Safety and Homeland Security and Senator Michael D. Brady, vice chair of the committee, followed up on Jay West's testimony with questions.

Representative González: Thank you for your testimony. You know, your testimony contradicts a little bit of what we've heard earlier today on the PFAS and the amount and how it is impacting some of our firefighters. They did mention that there was some attempt to nationally try to determine what amount of PFAS is doable or suitable for the protections of our firefighters. Is this a conversation that your company is involved with? Jay West: No, that would be more suited towards the manufacturers of the PPE themselves. So I really can't help you with that dimension of this. I'm sorry. Representative González: Okay, great. Thank you. Senator?

The exchange then continued, with a statement from Senator Brady.

Thank you Mr. Chair, good afternoon. I just wanted to let you know, I constantly am getting concerns from the communities that I represent in regard to PFAS. And I know you may have much more knowledge being a chemist, but now obviously with our public safety personnel with the equipment they're using that's a concern, but also our drinking water supply. We're constantly working to get funding as our water supplies in communities that I represent run out of other means constantly dealing with PFAS in the water supply. So I've got a lot of concerns about this and we keep sending back money. It's like a Band-Aid approach to try to solve the problem, to clean the water supply. But then it happens every year. So there's a lot of concerns that I'm getting about PFAS. So if you have some other knowledge about PFAS, if you wouldn't mind through our chairman to get us your findings. Because you are a chemist, I'd like to ask if you could get that to our committee if possible through the chairs. Jay West: Yes, sir. We will do that. Thank you.

In direct opposition to industry groups, public interest groups and legislators highlight the health risks that firefighters face due to PFAS exposure through their PPE, emphasizing the need

for measures to protect them. Testimony directly from firefighters underscored firsthand experiences of exposure and the challenges posed by contaminated gear, advocating for stricter regulations to mitigate health risks. However, despite firefighters themselves being the focal point of these discussions, industry groups did not appear to be dissuaded from giving testimony that referenced concern for their safety, even when recommending actions that are in direct contradiction to their stated desires. There appeared to be an ongoing dialogue between legislators and industry groups perhaps originating from the public hearings held by the PFAS Interagency Task Force. However, legislators did not appear to be swayed and occasionally followed up with pointed or accusatory remarks.

Legislators

Legislators play a unique role in hearings by posing follow-up questions both to industry representatives and public interest groups. In the case of industry groups, the follow ups often aim to clarify inconsistencies or challenge assertions that contradict public interest group testimonies or the legislators' own knowledge. Legislators also leverage authoritative reports and findings, such as those from the PFAS interagency task force, to support specific bills and confront industry arguments. This dynamic mirrors the tactics employed by public interest groups during testimony, where they seek to highlight discrepancies while advocating for their positions.

On June 12, 2023 Erin DeSantis of the ACC testified before the Joint Committee on Consumer Protection and Professional Licensure in opposition to companion bills S175 and H318 "An act relative to toxic-free kids".

ACC has actively supported laws and regulations at the federal level to ensure the health and safety of consumers and protect our environment. There are already more than a dozen federal regulatory laws for the safe use of chemicals, including the Toxic Substances Control Act, or TSCA, which helps reduce the number of inconsistent state based chemical programs that challenge interstate commerce and send mixed messages to consumers. We believe the federal government is best suited to regulate chemicals because it has the resources to carry out comprehensive testing, reporting, and oversight.

This rhetoric aligns with previously discussed discourse from industry representatives, constituting a status quo bias appeal. However, Representative Dawne Shand directly refuted the assertion that states should not implement their own chemical programs because federal programs are sufficient, citing a fatal chemical plant explosion which occurred in her district the month prior.

Representative Dawne Shand: I represent a district where a chemical plant exploded a few weeks ago and someone died. So I appreciate the aspect of the federal government overseeing some of these chemicals, but we don't. We have an imperative to do something in our communities when there's a tragedy like this. And are you aware of the Seqens explosion?

Erin DeSantis: Um we are, we have a responsible care program through the American Chemistry Council, and our members are required to participate in that. We also have, um, community activation networks that we help out with. And I'm happy to send you some additional information on those so that you can reach out to your constituents and we can provide support to you"

Immediately following this exchange, Professor of epidemiology, Carmen Messerlian

from the Harvard School of Public Health, testified in support of S175 and H318.

It's unconscionable to me as a professor and mother of two teenage boys, kids in Brookline, in Massachusetts, the most educated part of the United States of America, that we continue to consider jobs over children's lives. I find it repulsive to hear testimony by the council before me on the need for job protection, above and beyond the health of our children. I study typhus in my lab. I have an NIH funded study that allows me to examine the results of national and local data. That shows me with complete confidence that PFAS harm our children's health. They harm their reproductive health. They harm their immune health. They harm their ability to grow, to develop in the in the uterus. Babies that are exposed in utero have a much higher risk of being born preterm and being born small. These chemicals are found in our food chain, in our water. Why are we adding them into our products that our children are exposed to? Increasing the body burden of exposure to my children and your children causing harm across generations. I am livid at the testimony before me and I urge you to support this bill Professor Messerlian's testimony underscores the public interest perspective, by leveraging scientific evidence to advocate for regulatory measures to protect children, a valorized group, from harmful chemical exposures. Professor Messerlian's comments serve as a strong rebuttal to industry arguments and highlight the imperative of prioritizing public health and safety in regulatory decision-making. While her language is more assertive than Representative Shand's, both directly challenge the testimony of ACC representative DeSantis and express dissatisfaction with a relaxed state regulatory approach while presenting specific concerns to support their positions.

While some concerns used to rebut industry testimony were related to specific issues within the congressperson's district (such as Senator Michael D. Brady and Representative Dawne Shand), legislators also frequently referenced the findings and recommendations from the PFAS interagency task force final report to bolster support for the wording or ethos of bills that were contested by industry groups.

On June 7, 2023, Senator Julian Cyr, author of S1502 "An act relative to the reduction of certain toxic chemicals in firefighter personal protective equipment" and co-chair of the PFAS interagency task force, testified during the public hearing for S1502 to the Joint Committee on Public Safety and Homeland Security. In his response to a question from Representative González, Senator Cyr directly blamed the manufacturers of PFAS for their inaction in notifying the authorities and public of the health effects of PFAS.

I will note that the manufacturers of the PFAS chemicals themselves, these manufacturers have known about the adverse health effects of PFAS and this class of chemicals for decades and took no action likely did not inform manufacturers of turnout gear and manufacturers a whole host of other consumer products and products that these industrially, did not inform anyone of that. There was action actually, then Attorney General Governor Healey, as part of a class action lawsuit that our now Attorney General Campbell is continuing with these manufacturers. But PFAS is very good at wicking

away moisture and keeping sort of substances out right. It really it forms a really strong barrier there. So I'm not familiar with the specifics of manufacturing of alternatives. I'm aware alternatives do exist. I think what's crucial now, now that we are aware of the health effects of PFAS, we want to remove as much of this turn out gear as soon as possible.

While Senator Cyr acknowledged the effectiveness of PFAS chemicals in their intended uses in firefighter PPE, he emphasizes a public health perspective that prioritizes the removal of PFAS-containing gear due to the known health risks associated with these chemicals. His comments underscore the tension between the functional benefits of PFAS touted by industry groups and the imperative to address the health consequences posed by their use.

Discussion

In this study, I examined the legislative conflicts about PFAS regulation in Massachusetts, focusing on the strategies employed by industry representatives to oppose certain bills. The findings revealed that industry lobbyists often argued against proposed regulations by emphasizing potential economic burdens and concerns for consumers reliant on PFAS-containing products. They invoked a perceived lack of alternatives and uncertainties regarding the risks associated with PFAS chemicals to advocate for a reduced regulatory approach.

Furthermore, industry representatives emphasized a risk-based approach over precautionary measures, characterizing proposed regulations as overly broad and disruptive to the economy. They argued that any regulation should be structured as targeted assessments of specific PFAS chemicals, positioning expansive regulations as unwarranted and detrimental to industries and vulnerable groups reliant on PFAS products.

One key finding of this study is the strategy of industry groups to avoid discussion of the well-documented human toll of PFAS exposure, instead focusing on economic concerns and potential impacts on consumers. This aligns with anticipated outcomes based on existing

literature. However, an unexpected observation was the bold and often direct rebuttal of these industry tactics by public interest groups who were also giving testimony, as well as by the legislators holding the hearings. Despite industry tactics remaining largely unchanged from historical examples such as the health deception campaigns waged by tobacco companies and climate denialism from fossil fuel groups, public interest groups and legislators now show a keen awareness of these strategies and a willingness to confront them when they surface. This awareness underscores considerable sophistication in how stakeholders engage with industry influence in regulatory processes, possibly reflecting a growing emphasis on the role of public interest groups in combating the influence of private interest groups in the regulatory sphere.

The unexpected response from public interest groups and legislators suggests a growing awareness and resilience to industry tactics. While the impetus for this response is not yet clear, it is worth pursuing in future research. The proactive stance taken by public interest groups suggests a shift towards more assertive engagement, perhaps driven by a desire for evidence-based policymaking and public health protection.

Limitations

While this study collected and considered all the bills in the MA Legislature over the period 2023-2024, and attempted to present a comprehensive analysis, it does not include all sources of information about these bills. Due to time and resource constraints, I did not collect any written testimony submitted to the Congresspeople prior to and following the public hearings. This was in part due to the sheer volume of material involved. It is possible that the testimony could have provided valuable insights, however, I anticipated that the majority of this material would be submitted by industry representatives, and therefore align with industry

perspectives, consistent with existing literature findings on the lobbying strategies of industries like tobacco and oil companies.

Moreover, my final dataset of bills was not exhaustive; I aimed for diversity but cannot guarantee it represents all lobbying activities surrounding PFAS. I selected bills I believed would attract significant attention from lobbyists while also having a strong likelihood of passing past the public hearing phase. I initially planned to pursue the path of the bills from its initial introduction to either its failure or passage. However, due to time constraints this was not possible for this research project.

Given more time and resources, I would have spoken to legislators or their staff to understand their perspectives on the testimonies presented. Additionally, I would have liked to observe the public hearings held by the Interagency PFAS Task Force, as this could serve as a valuable metric to assess whether industry groups adapted their tactics when later engaging with legislators during the 2023 legislative session.

Additionally, though this research project revolves around themes of private interests interfering with issues of public health, my method of data collection covers only one pathway through which private interests interact with the realm of public policy. Other ways through which private interest exert influence on the public sphere involves engineering science, various outsider strategies, and closed door negotiations. None of these are explored in this research.

Conclusion

The examination of lobbying activities and testimonies surrounding PFAS regulation highlights significant dynamics between industry representatives and pro-regulatory advocates which are underrepresented in the literature. Industry representatives consistently emphasized potential economic impacts to argue against stringent regulation of PFAS chemicals. They also highlighted the effects on highly valued populations such as firefighters and medical professionals. This strategic framing aimed to influence policymakers by appealing to broader societal concerns and potential consequences of regulatory actions.

Conversely, while applying the same importance to highly valorized groups, pro-regulatory testifiers often employed personal anecdotes and narratives involving personal encounters by PFAS contamination to advocate for stricter regulation. These testimonies aimed to evoke empathy and urgency among policymakers by highlighting the human impact of PFAS exposure. Throughout this process, legislators have demonstrated a poignant awareness of industry tactics and actively rebuked them during hearings. This suggests a growing recognition among policymakers of the historical industry tactics. The insights gained from this analysis contribute to understanding the interplay between private interests, public advocacy, and regulatory decision-making in addressing environmental challenges like PFAS contamination.

References

- American Chemistry Council. 2023. "Organizations Around the Country Oppose EPA's Flawed
 Drinking Water Proposal American Chemistry Council." *American Chemistry Council*.
 Retrieved April 19, 2024
 - (https://www.americanchemistry.com/chemistry-in-america/news-trends/blog-post/2023/ organizations-around-the-country-oppose-epa-s-flawed-drinking-water-proposal).
- BillTrack 50. 2021. "Which State Legislatures Allow Companion Bills?" *BillTrack50*. Retrieved April 12, 2024

(https://www.billtrack50.com/blog/political-process/legislative-process/which-state-legisl atures-allow-companion-bills/).

- Blum, Arlene, Simona A. Balan, Martin Scheringer, Xenia Trier, Gretta Goldenman, Ian T.
 Cousins, Miriam Diamond, Tony Fletcher, Christopher Higgins, Avery E. Lindeman,
 Graham Peaslee, Voogt Pim de, Zhanyun Wang, and Roland Weber. 2015. "The Madrid
 Statement on Poly- and Perfluoroalkyl Substances (PFASs)." *Environmental Health Perspectives* 123(5):A107–11. doi: 10.1289/ehp.1509934.
- Brandt, Allan M. 2012. "Inventing Conflicts of Interest: A History of Tobacco Industry Tactics." *American Journal of Public Health* 102(1):63–71. doi: 10.2105/AJPH.2011.300292.
- Brulle, Robert J. 2018. "The Climate Lobby: A Sectoral Analysis of Lobbying Spending on Climate Change in the USA, 2000 to 2016." *Climatic Change* 149(3):289–303. doi: 10.1007/s10584-018-2241-z.

Connolly, Gerald E. 2022. Consolidated Appropriations Act, 2023.

Cousins, Ian T., Robin Vestergren, Zhanyun Wang, Martin Scheringer, and Michael S. McLachlan. 2016. "The Precautionary Principle and Chemicals Management: The Example of Perfluoroalkyl Acids in Groundwater." *Environment International* 94:331-40. doi: 10.1016/j.envint.2016.04.044.

- Druckman, James N. 2022. "A Framework for the Study of Persuasion." *Annual Review of Political Science* 25(1):65–88. doi: 10.1146/annurev-polisci-051120-110428.
- van Eck, Peter S., Wander Jager, and Peter S. H. Leeflang. 2011. "Opinion Leaders' Role in Innovation Diffusion: A Simulation Study." *Journal of Product Innovation Management* 28(2):187–203. doi: 10.1111/j.1540-5885.2011.00791.x.
- Edwards, Nelta. 2008. "An Ounce of Precaution." *Contexts* 7(2):26–31. doi: 10.1525/ctx.2008.7.2.26.
- EPA. 2024. "Biden-Harris Administration Finalizes Critical Rule to Clean up PFAS Contamination to Protect Public Health | US EPA." Retrieved April 19, 2024 (https://www.epa.gov/newsreleases/biden-harris-administration-finalizes-critical-rule-clea n-pfas-contamination-protect).
- European Commission. 2002. "Commission Adopts Communication on Precautionary Principle." *European Commission - European Commission*, February 2.
- Gaber, Nadia, Lisa Bero, and Tracey J. Woodruff. 2023. "The Devil They Knew: Chemical Documents Analysis of Industry Influence on PFAS Science." *Annals of Global Health* 89(1):37. doi: 10.5334/aogh.4013.
- Hall, Richard L., and Alan V. Deardorff. 2006. "Lobbying as Legislative Subsidy." American Political Science Review 100(1):69–84. doi: 10.1017/S0003055406062010.
- Hong, Sounman, and Sanghyun Lee. 2018. "Adaptive Governance, Status Quo Bias, and
 Political Competition: Why the Sharing Economy Is Welcome in Some Cities but Not in
 Others." *Government Information Quarterly* 35(2):283–90. doi:
 10.1016/j.giq.2018.02.001.

- Joselow, Maxine, and Brady Dennis. 2024. "For the First Time, U.S. May Force Polluters to Clean up These 'Forever Chemicals."" *Washington Post*, April 19.
- Julian Cyr and Kate Hogan. 2022. "PFAS Interagency Task Force." Retrieved April 11, 2024 (https://malegislature.gov/Commissions/Detail/556/Documents).
- Kluger, Jeffrey. 2023. "Companies Hid Dangers of PFAS Forever Chemicals For Decades | Time." *TIME*, June 1.
- Lang, Corey, Michael Weir, and Shanna Pearson-Merkowitz. 2021. "Status Quo Bias and Public Policy: Evidence in the Context of Carbon Mitigation." *Environmental Research Letters* 16(5):054076. doi: 10.1088/1748-9326/abeeb0.
- Minozzi, William, Hyunjin Song, David M. J. Lazer, Michael A. Neblo, and Katherine
 Ognyanova. 2019. "The Incidental Pundit: Who Talks Politics with Whom, and Why? Minozzi 2020 American Journal of Political Science Wiley Online Library."
 Retrieved December 18, 2023

(https://onlinelibrary.wiley.com/doi/full/10.1111/ajps.12469).

- Oreskes, Naomi. 2010. Merchants of Doubt: How a Handful of Scientists Obscured the Truth on Issues from Tobacco Smoke to Global Warming. 1st U.S. ed.. New York: Bloomsbury Press.
- Peters, Gary C. 2022. PFAS Act.
- Rothstein, Henry, Phil Irving, Terry Walden, and Roger Yearsley. 2006. "The Risks of Risk-Based Regulation: Insights from the Environmental Policy Domain." *Environment International* 32(8):1056–65. doi: 10.1016/j.envint.2006.06.008.
- Supran, G., S. Rahmstorf, and N. Oreskes. 2023. "Assessing ExxonMobil's Global Warming Projections." *Science (New York, N.Y.)* 379(6628):eabk0063. doi:

10.1126/science.abk0063.

Tai, Laurence. 2017. "Regulatory Capture and Quality." Journal of Public Policy 37(3):261-86.

US EPA, OA. 2016. "PFAS Explained." Retrieved December 18, 2023

(https://www.epa.gov/pfas/pfas-explained).

US EPA, OCSPP. 2016. "Fact Sheet: 2010/2015 PFOA Stewardship Program." Retrieved December 18, 2023

(https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/fact-sheet-20102015 -pfoa-stewardship-program).

- Walker, Edward T. 2012. "Putting a Face on the Issue: Corporate Stakeholder Mobilization in Professional Grassroots Lobbying Campaigns." *Sage Publications*.
- Wang, Zhanyun, Ian T. Cousins, Martin Scheringer, and Konrad Hungerbuehler. 2015. "Hazard Assessment of Fluorinated Alternatives to Long-Chain Perfluoroalkyl Acids (PFAAs) and Their Precursors: Status Quo, Ongoing Challenges and Possible Solutions."
 Environment International 75:172–79. doi: 10.1016/j.envint.2014.11.013.
- Xu, Qian. 2017. "Dual Process Models of Persuasion." Pp. 1–13 in *The International Encyclopedia of Media Effects*. John Wiley & Sons, Ltd.

Appendix

Bill Tables

Bills highlighted in green indicate it is a companion bill in the final sample, Bills on light blue squares indicate it is a sneaky bill. A bill that is both highlighted in green and on a blue square indicates that it is a companion bill that is also a sneaky bill. Given that companion bills are often nearly identical, if one companion bill is one a blue square, its counterpart should be as well.

Bill ID Presentor Name: An Act... H101 Paul A. Schmid, III Protecting our soil and farms from PFAS contamination James K. Hawkins H318 Relative to toxic free kids H767 Michelle L. Ciccolo To reduce single-use plastics from the environment H779 Michael S. Day To save recycling costs in the commonwealth Kathleen R. LaNatra Establishing an ecologically-based mosquito management H845 Democrat program in the Commonwealth to protect public health S1431 Michael O. Moore Relative to chemicals in food packaging Jay D. Livingstone For the establishment of a voucher program for home water H853 Democrat filtration equipment H863 Lenny Mira Relative to proper disposal of products containing PFAS Kate Hogan and Julian H2197 To protect Massachusetts public health from PFAS Cyr Relative to the establishment of the PFAS research and H2317 Carol A. Doherty development public safety fund Relative to the reduction of certain toxic chemicals in H2339 James K. Hawkins firefighter personal protective equipment H3580 Rodney M. Eliot Relative to certain manufactured chemicals known as PFAS H3676 Michelle L. Ciccolo To update the bottle bill Prohibiting state and municipal contracts for the purchase Carmine Lawrence H3948 and installation of artificial turf fields Gentile **S39** Joanne M. Comerford Protecting our soil and farms from PFAS contamination S175 Cindy F. Friedman Relative to toxic-free kids Establishing an ecologically-based mosquito management S445 Joanne M. Comerford program in the Commonwealth to protect public health To reduce waste and recycling costs in the commonwealth S471 Sal N. DiDomenico

Master List, The Initial 28 Bills

		To further research and report analysis of athletic
S523	Jason M. Lewis	performance surfaces their safety and recommendations
	Jason M. Lewis (By request) Vincent	
S524	Lawrence Dixon	To consider the safety of artificial grass and turf surfaces
S525	Jason M. Lewis	To reduce single-use plastics from the environment
S572	Michael F. Rush	To save recycling costs in the commonwealth
		Studying the effect of per- and polyfluoroalkyl substances in
<mark>S588</mark>	John C. Velis	commercial products
S1356	Julian Cyr	To protect Massachusetts public health from PFAS
		Relative to the reduction of certain toxic chemicals in
S1502	Julian Cyr	firefighter personal protective equipment
		Relative to the reduction of certain toxic chemicals in
S1556	Michael O. Moore	firefighter personal protective equipment
		Relative to the establishment of the PFAS Research and
<mark>S1559</mark>	Michael O. Moore	Development Public Safety Fund
		Establishing a moratorium on the procurement of structures
S2053	Marc R. Pacheco	or activities generating PFAS emissions
		Prohibiting state and municipal contracts for the purchase

Sneaky Bills

Bill ID	Presentor	Name: An Act
		Prohibiting state and municipal contracts for the purchase
S2057	Marc R. Pacheco	and installation of artificial turf fields
		To further research and report analysis of athletic
S523	Jason M. Lewis	performance surfaces their safety and recommendations
	Jason M. Lewis (by	
	request) Vincent	
S524	Lawrence Dixon	To consider the safety of artificial grass and turf surfaces
		Establishing an ecologically-based mosquito management
H845	Kathleen R. LaNatra	program in the Commonwealth to protect public health
		Establishing an ecologically-based mosquito management
S445	Joanne M. Comerford	program in the Commonwealth to protect public health
		Relative to the reduction of certain toxic chemicals in
S1502	<mark>Julian Cyr</mark>	firefighter personal protective equipment
H2339	James K. Hawkins	Relative to the reduction of certain toxic chemicals in

		firefighter personal protective equipment
		Relative to the reduction of certain toxic chemicals in
S1556	Michael O. Moore	firefighter personal protective equipment
	Jason M. Lewis (By	
	request) Vincent	
S524	Lawrence Dixon	To consider the safety of artificial grass and turf surfaces
H3676	Michelle L. Ciccolo	To update the bottle bill
	Carmine Lawrence	Prohibiting state and municipal contracts for the purchase
H3948	Gentile	and installation of artificial turf fields

Companion/Duplicate Bills

Bill ID	Presenter	Name: An Act
H101	Paul A. Schmid, III	Protecting our soil and farms from PFAS contamination
<mark>S39</mark>	Joanne M. Comerford	Protecting our soil and farms from PFAS contamination
S1502	Julian Cyr	Relative to the reduction of certain toxic chemicals in firefighter personal protective equipment
H2339	James K. Hawkins	Relative to the reduction of certain toxic chemicals in firefighter personal protective equipment
<mark>S1556</mark>	Michael O. Moore	Relative to the reduction of certain toxic chemicals in firefighter personal protective equipment
H767	Michelle L. Ciccolo	To reduce single-use plastics from the environment
S525	Jason M. Lewis	To reduce single-use plastics from the environment
S445	Joanne M. Comerford	Establishing an ecologically-based mosquito management program in the Commonwealth to protect public health
H845	Kathleen R. LaNatra	Establishing an ecologically-based mosquito management program in the Commonwealth to protect public health
H3948	Carmine Lawrence Gentile	Prohibiting state and municipal contracts for the purchase and installation of artificial turf fields
S2057	Marc R. Pacheco	Prohibiting state and municipal contracts for the purchase and installation of artificial turf fields
S1356	<mark>Julian Cyr</mark>	To protect Massachusetts public health from PFAS
H2197	Kate Hogan and Julian Cyr	To protect Massachusetts public health from PFAS
<mark>S1502</mark>	Julian Cyr	Relative to the reduction of certain toxic chemicals in firefighter personal protective equipment
H2339	James K. Hawkins	Relative to the reduction of certain toxic chemicals in firefighter personal protective equipment
S1559	Michael O. Moore	Relative to the establishment of the PFAS Research and Development Public Safety Fund
H2317	Carol A. Doherty	Relative to the establishment of the PFAS research and development public safety fund

S175	Cindy F. Friedman	Relative to toxic-free kids
H318	Hawkins of Attleboro	Relative to toxic-free kids

Final Data Selection 19 Bills (Subcategories Included)

Bill ID	Presenter	Title: An Act
	Carmine Lawrence	Prohibiting state and municipal contracts for the purchase
H3948	Gentile	and installation of artificial turf fields
		Prohibiting state and municipal contracts for the purchase
S2057	Marc R. Pacheco	and installation of artificial turf fields
<mark>S39</mark>	Joanne M. Comerford	Protecting our soil and farms from PFAS contamination
H101	Paul A. Schmid, III	Protecting our soil and farms from PFAS contamination
S1356	Julian Cyr	To protect Massachusetts public health from PFAS
	Kate Hogan and Julian	
H2197	Cyr	To protect Massachusetts public health from PFAS
		Relative to the reduction of certain toxic chemicals in
S1502	Julian Cyr	firefighter personal protective equipment
		Relative to the reduction of certain toxic chemicals in
H2339	James K. Hawkins	firefighter personal protective equipment
		Relative to the reduction of certain toxic chemicals in
<u>S1556</u>	Michael O. Moore	firefighter personal protective equipment
01550		Relative to the establishment of the PFAS Research and
<u>81559</u>	Michael O. Moore	Development Public Safety Fund
110017		Relative to the establishment of the PFAS research and
H2317	Carol A. Doherty	development public safety fund
S175	Cindy F. Friedman	Relative to toxic-free kids
H318	Hawkins of Attleboro	Relative to toxic-free kids
S1431	Michael O. Moore	Relative to chemicals in food packaging
		For the establishment of a voucher program for home water
H853	Jay D. Livingstone	filtration equipment
		Establishing a moratorium on the procurement of structures
S2053	Marc R. Pacheco	or activities generating PFAS emissions
H863	Lenny Mira	Relative to proper disposal of products containing PFAS
H3580	Rodney M. Eliot	Relative to certain manufactured chemicals known as PFAS
		Studying the effect of per- and polyfluoroalkyl substances
S588	John C. Velis	in commercial products

Second Wave Code List

	Parent			
Id	Id	Depth	Title	Description
			Legislator	
1		0	(Politician)	
				Testifier opposed to the Bill (trade
2		0	OP	association/private interest groups)
			American Chemical	
3	2	1	Council	The ACC reps
			Other Private	
4	2	1	Interest Groups	
5		0	OP Strategy	Chemical corporation playbook
			Consumer/Business	Cannot regulate due burden on businesses,
6	5	1	(product concern)	unfair to consumers, etc
				Sufficient regulation on federal level already,
				should wait for uniform laws instead of state
7	5	1	Existing Reg	by state
8	5	1	Insufficient science	Wait for more research/scientific consensus
			Risk Based	Contrary to hazardous characteristic (AKA the
9	5	1	Evaluation	precautionary principle)
				Wait for all the parties (industry and public) to
10	5	1	Stakeholder input	agree with legislation
11		0	Other State Laws	
12		0	Pro Reg (Parties)	Testifier in support of regulation/bill
			Business	
13	12	1	(rep/interest group)	
			Environmental/Healt	
14	12	1	h Group	
				Highly Valorized Group. Children, firefighters,
15	12	1	HV	doctor/healthcare worker, student, etc.
				References to children (anecdote), or child
16	15	2	Children	testifier
			Doctors (medical	Includes EMT, nurses, separate from other first
17	15	2	profession)	responder/firefighter groups
			Experts (Professor,	
			Scientists, Gov't	
18	15	2	taskforce)	Speaks from position of authority in field
19	15	2	Firefighters	Also EMT, first responders

				Broadly, includes references to proximity near
20	15	2	Military	military bases
21	15	2	Students	
22	21	3	K12	Students under 18
23	21	3	Under/Grad	Students over 18
24	12	1	Union Rep/Others	
25		0	Pro Strategy	Pro-regulator strategies
				Usually in reference to firefighting gear or
				children's toys. Safe non-PFAS alternatives,
26	25	1	Alternatives	existing or hypothetical
27	25	1	Bill Action	
				Health, Contamination, etc. concerns. Potential
28	25	1	Risks/Consequences	and actual.
			Science Reference	
29	25	1	(Positive)	Personal expertise or published studies

Table of Notable Testifiers

This table is not an exhaustive list of everyone who testified for the bills in the sample.

Name of				
Testifier	Affiliation	Group	Committee Appearance	Bills
Sean Swearingen	ACC	Industry	Joint Committee for Public Health	S.1431, S.1356, H.2197
Brian Johnson	MassMEDIC	Industry	Joint Committee for Public Health	S.1356, H.2197
Roxy Kozyckyj	Advanced Medical Technology Association	Industry	Joint Committee for Public Health	S.1356, H.2197
Andrew Bemis	PFAS Action Network	Industry	Joint Committee for Public Health	S.1356, H.2197
Colin Richmond	Massachusetts Sierra Club	Public Interest	Joint Committee for Public Health	S.1356, H.2197
Shannon Beatty	Slingshot	Public Interest	Joint Committee for Public Health	S.1356, H.2197
Sura Hassoun	Massachusetts Breast Cancer Coalition	Public Interest	Joint Committee for Public Health	S.1356, H.2197

Professor Carmen	Harvard School of	Public	Joint Committee for Consumer Protection and	
Messerlian	Public Health	Interest	Professional Licensure	S.175, H.318
Malka Vikram	Massachusetts Breast Cancer Coalition	Public Interest	Joint Committee for Consumer Protection and Professional Licensure	S.175, H.318
Cheryl Osimo	Massachusetts Breast Cancer Coalition	Public Interest	Joint Committee for Consumer Protection and Professional Licensure	S.175, H.318
Kathryn Rogers	Doctoral student	Public Interest	Joint Committee for Consumer Protection and Professional Licensure	S.175, H.318
Dr. Brita Lundberg	Greater Boston Physicians for Social Responsibility	Public Interest	Joint Committee for Consumer Protection and Professional Licensure	S.175, H.318
Sarah Hasson	Massachusetts Breast Cancer Coalition	Public Interest	Joint Committee on Public Health	H.2197, S.1356
Laurel Shaider	Silent Spring Institute	Public Interest	Joint Committee on Public Health	H.2197, S.1356
Lily Siegel	Environment Massachusetts	Public Interest	Joint Committee on Public Health	H.2197, S.1356
Dr. Ann Lutz	Resident of Westminster, Massachusetts	Public Interest	Joint Committee on Public Health	H.2197, S.1356
Laura Spark	Clean Water Action	Public Interest	Joint Committee on Agriculture	S.39, H.101
Professor Dave Rakow	UMass Amherst	Public Interest	Joint Committee on Environment and Natural Resources	H.853
Representative Danillo A. Sena	House	Legislator	Joint Committee on Environment and Natural Resources	H.853
Jay West	ACC	Industry	Joint Committee on Public Safety and Homeland	S1502, S.1556

			Security	
President Richard Cannon	Professional Firefighters of Massachusetts	Public Interest	Joint Committee on Public Safety and Homeland Security	S1502, S.1556
Senator Michael D. Brady	Senate	Legislator	Joint Committee Public Safety and Homeland Security	S1502, S.1556
Senator Julian Cyr	Senate	Legislator	Joint Committee Public Safety and Homeland Security	S1502, S.1556
Representative Carlos González	House	Legislator	Joint Committee Public Safety and Homeland Security	S1502, S.1556
Erin DeSantis	ACC	Industry	Joint Committee for Consumer Protection and Professional Licensure	S.175, H.318
Representative Dawne Shand	House	Legislator	Joint Committee for Consumer Protection and Professional Licensure	S.175, H.318
Representative Carmine Lawrence Gentile	House	Legislator	Joint Committee on State Administration & Regulatory Oversight	H.3948
Chrissy Lynch	Massachusetts AFL-CIO (labor federation)	Public Interest	Joint Committee on Public Safety and Homeland Security	H.2317
Senator Michael O. Moore	Senate	Legislator	Joint Committee on Public Safety and Homeland Security	S.1559