BEYOND PESTICIDES
701 E Street, SE ▪ Washington DC 20003
202-543-5450 phone ▪ 202-543-4791 fax
info@beyondpesticides.org ▪ www.beyondpesticides.org

Statement of Beyond Pesticides
in Support of S.5759 and A.6192 with Amendments
New York Assembly and Senate
House and Senate Agriculture and Environmental Conservation Committees
May 22, 2025

Dear New York Senators and Representatives,

Honorable Chairs, Vice Chairs, Ranking Members, and members of House and Senate Committees – we appreciate the opportunity to testify on S.5759 and A.6192, and the importance of adopting legislation to protect people and local ecosystems from toxic sewage sludge contaminated with, among other emerging contaminants of concern, per- and polyfluoroalkyl substances (PFAS).

Beyond Pesticides is a national, grassroots membership organization that represents community-based organizations and a range of people seeking to improve protections from pesticides and promote alternative pest management strategies that reduce or eliminate a reliance on toxic pesticides. Our membership spans the 50 states, the District of Columbia, and groups around the world. We are providing this testimony on behalf of our members and supporters in the state of New York.

We urge the New York legislature, including the House and Senate Agriculture Committees and Environmental Conservation Committees, to vote in favor of S.5759 and A.6192 with amendments. While it is significant that the proposed legislation recognizes the issue of PFAS contamination and regulation in a holistic manner, we urge the Committee to place the burden of responsibility on regulatory agencies to consider a broader approach in response to the biodiversity and public health threats referenced in the bills. In an era of across-the-board deregulation at the federal level on environmental protections, including the proposed weakening of federal drinking water standards on PFAS such as delayed limits,[i] the onus is on state leaders to ensure a more robust response to regulatory failures that exacerbate risks to nontarget organisms and communities, as defined in the large body of peer-reviewed scientific findings.

We urge that the following amendments be adopted to support alternative food production systems that do not rely on toxic substances, as the U.S. Environmental Protection Agency (EPA) does not currently require consideration of nonchemical, organic, or sustainable alternatives to pest management in promulgating the pesticide registration review process. In this context, organic farming as defined under the *Organic Foods Production Act* (OFPA) and more broadly

applied to all land management, should be explicitly included in the statutory definition of "alternative cropping systems." Organic land management, as defined in OFPA, prohibits the use of biosolids in its management system. The purpose and intent of this legislation, as we understand it, is to create a higher standard of environmental protection. The need for improved protection and a clear definition of alternatives is supported by this testimony, the scientific literature, and findings of EPA deficiencies cited herein.

Therefore, we suggest the following:

1. A definition should be added for "alternative cropping systems" that includes the following language: "land and agricultural management systems that promote alternative practices and principles to synthetic inputs, including organic agriculture as defined in the *Organic Foods Production Act*, as well as regenerative, agroecological, biodynamic, and other forms of sustainable agriculture that incorporate the organic definition in federal law."
2. Add "*including nonchemical alternative pest management practices and organic farming*" to Line 12 of Page 4.
3. Add "one member that represents the agricultural community, including farmers with specific experience navigating PFAS contamination" to the makeup of the PFAS Task Force to ensure that the farmers with lived experiences navigating this issue are represented in future decision-making.

PFAS (per- and polyfluoroalkyl substances, often referred to as "forever chemicals") contamination of our bodies and ecosystems has long-term adverse health impacts, as made evident in the latest scientific literature. In 2021, researchers at Brown University found that gestational and childhood exposure to PFAS increases cardiometabolic risk, or the risk of heart diseases and metabolic disorders, later in life.[2] Past studies associate exposure to chemical pollutants with increased susceptibility to adverse health effects during critical fetal and childhood developmental periods. Some of these health effects are cardiometabolic risk factors, including obesity, insulin issues, abnormal blood pressure, that increase the risk of developing cardiovascular disease (CVD) and metabolic disorders (e.g., type 2 diabetes).[3,4,5] PFAS contamination has also been linked to epigenetic effects,[6] liver injury,[7] and various cancers, among other adverse health effects.

EPA has not taken a proactive or precautionary approach to addressing the issue of "forever chemicals," as evidenced in the scientific literature. In just one example, a team of researchers based at Texas Tech and U.S. Department of Agriculture's Cropping Systems Research Laboratory in Texas, found alarmingly high levels of PFAS chemicals in commonly used pesticides,[8] calling into question assurances from EPA that contamination is limited to storage containers.[9] For some pesticides, PFAS levels were found to be nearly one billion times higher than the EPA's (at the time) recently updated Health Advisory for the PFAS chemical PFOS. Farmers are one group facing the brunt of exposure, with Public Employees for Environmental Responsibility (PEER) filing a lawsuit against the EPA in June 2024 on behalf of a group of ranchers and farmers in Texas harmed by biosolids.[10] This is just the tip of the iceberg

on the failure of the federal government to adequately regulate and prevent PFAS contamination at the source.

In summation, we urge passage of S.5759 and A.6192 with the incorporation of our proposed amendments. With the adoption of these changes to the bills, we urge the New York legislature to take action to eliminate the need for toxic substances such as PFAS-contaminated sewage sludge, which can be replaced by practices and materials compatible with the environment and public safety.

Thank you for your consideration of our comments, and please do not hesitate to reach out if you have any questions.

Sincerely,

Jay Feldman, Executive Director
Max Sano, Senior Policy & Coalitions Associate

---

[i] 'EPA Announces It Will Keep Maximum Contaminant Levels for PFOA, PFOS' (2025) *U.S. EPA News Releases* [Preprint]. Available at: https://www.epa.gov/newsreleases/epa-announces-it-will-keep-maximum-contaminant-levels-pfoa-pfos (Accessed: 2025).

[2] Li, N. *et al.* (2021) 'Gestational and childhood exposure to per- and polyfluoroalkyl substances and cardiometabolic risk at age 12 years', *Environment International*, 147, p. 106344. doi:10.1016/j.envint.2020.106344.

[3] Halldorsson, T.I. *et al.* (2012) 'Prenatal exposure to perfluorooctanoate and risk of overweight at 20 years of age: A prospective cohort study', *Environmental Health Perspectives*, 120(5), pp. 668–673. doi:10.1289/ehp.1104034.

[4] Mora, A.M. *et al.* (2016) 'Prenatal exposure to perfluoroalkyl substances and adiposity in early and mid-childhood', *Environmental Health Perspectives*, 125(3), pp. 467–473. doi:10.1289/ehp246.

[5] Takacs, M.L. and Abbott, B.D. (2006) 'Activation of mouse and human peroxisome proliferator–activated receptors (α, β/δ, γ) by perfluorooctanoic acid and perfluorooctane sulfonate', *Toxicological Sciences*, 95(1), pp. 108–117. doi:10.1093/toxsci/kfl135.

[6] Beyond Pesticides. (2025) 'Multitude of Studies Find Epigenetic Effects from PFAS and Other Endocrine Disrupting Pesticides', *Beyond Pesticides*. Available at: https://beyondpesticides.org/dailynewsblog/2025/01/multitude-of-studies-find-epigenetic-effects-from-pfas-and-other-endocrine-disrupting-pesticides/ (Accessed: 2025)

[7] Beyond Pesticides. (2025) 'Endocrine Disrupting Chemicals Contribute to Liver Injury, including Toxic PFAS and Pesticides', *Beyond Pesticides*. Available at: https://beyondpesticides.org/dailynewsblog/2022/08/endocrine-disrupting-chemicals-contribute-to-liver-injury-including-toxic-pfas-and-pesticides/ (Accessed: 2025)

[8] Lasee, S. *et al.* (2022) 'Targeted analysis and total oxidizable precursor assay of several insecticides for pfas', *Journal of Hazardous Materials Letters*, 3, p. 100067. doi:10.1016/j.hazl.2022.100067.

[9] 'EPA Announces New Drinking Water Health Advisories for PFAS Chemicals, $1 Billion in Bipartisan Infrastructure Law Funding to Strengthen Health Protections' (2022) *U.S. EPA News Releases* [Preprint]. Available at: https://www.epa.gov/newsreleases/epa-announces-new-drinking-water-health-advisories-pfas-chemicals-1-billion-bipartisan (Accessed: 2025).

[10] PEER (2025) *EPA sued to remove PFAS from biosolid fertilizers*, *PEER Press Releases*. Available at: https://peer.org/epa-sued-to-remove-pfas-from-biosolid-fertilizers/ (Accessed: 16 May 2025).