



HEALTHIER WORKPLACES | A HEALTHIER WORLD

February 16, 2022

Senator Shevrin D. “Shev” Jones
District 35
Florida State Senate

Senator Manny Diaz, Jr.
District 36
Chair, Health Policy Committee
Florida State Senate

Senator Jason Brodeur
District 9
Vice Chair, Health Policy Committee
Florida State Senate

Senator Aaron Bean
District 4
Chair, Appropriations Subcommittee
on Health and Human Services
Florida State Senate

Senator Ana Maria Rodriguez
District 39
Vice Chair, Appropriations
Subcommittee on Health and Human
Services
Florida State Senate

Representative Anna V. Eskamani
District 47
Florida House of Representatives

Representative Geraldine F. “Geri”
Thompson
District 44
Florida House of Representatives

AIHA Recommendations on Senate Bill 1394 / House Bill 933: Toxic Mold Protections

Dear Senators Jones, Diaz, Brodeur, Bean, and Rodriguez and Representatives Thompson and Eskamani:

AIHA, the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety, commends the legislature for focusing on mold and its related hazards, such as damp environments. However, **as currently written, we must strongly encourage you to oppose further consideration of these bills, as they contain several critical flaws.**

The legislation would require the Department of Health to “Develop and adopt permissible exposure limits to mold in indoor environments that avoid adverse effects on public health, with an adequate margin of safety, and avoid any significant risk to public health.” The legislation contains several provisions tied to creating these permissible exposure limits (PELs), including requirements related to disclosure and remediation.

While establishing PELs for airborne mold spores would seem to make sense, the reason they have not been established is that a consensus does not yet exist regarding the relationship between airborne concentrations of mold in an environment and their possible connection to adverse health effects. There are, by some estimates, over 5 million different species of mold in the world, and not all have the same potential impact on health. Additionally, the indoor environment contains numerous microbiological and chemical contaminants which could cause or contribute to health problems, including wet and damp building components rather than or in addition to the presence of mold.

Rather than seek to establish PELs for mold spores, we suggest that it is far better to focus on the underlying causes that lead to mold growth, specifically water intrusion through the building envelope, high indoor humidity, condensation, and plumbing leaks. Without the appropriate environment, mold cannot grow; thus, by focusing on the underlying causes of mold, the legislation will more efficiently achieve the goals you seek: protecting the health of Floridians. Amending the bill so that it focuses on the underlying causes of mold growth would significantly improve the legislation. Until that happens, **we must strongly encourage you to oppose further consideration of these bills.**

AIHA stands with you in your desire to protect Floridians and is ready to meet with you to discuss specific language for improving Senate Bill 1394 and House Bill 933. Please let us know if you would like to meet with us to discuss these or related matters by contacting Mark Ames at mames@aiha.org or (703) 846-0730.

Sincerely,



Lawrence Sloan, MBA, FASAE, CAE
Chief Executive Officer
AIHA

About AIHA

AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and

community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA's nearly 8,500 members are Certified Industrial Hygienists and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.