



November 5, 2021

Department of Toxic Substance Control (DTSC)
Attn: Safer Consumer Products (SCP) Program
1001 I Street
Sacramento, CA 95814

Submitted via online portal

Re: Support of the Proposal to List Treatments Containing PFAs for Use on Converted Textiles or Leathers as Priority Products Under the Safer Consumer Products (SCP) Regulations

Dear Safer Consumer Products (SCP) Program:

The organizations who have signed this letter, **strongly support listing treatments containing perfluoroalkyl or polyfluoroalkyl substances (PFAS) as Priority Products** for use on converted textiles or leathers such as carpets, upholstery, clothing, and shoes, under the SCP regulations. California has a responsibility to protect residents from toxic and bioaccumulative chemicals entering the market and they effectively stop the cost-effective recycling of these products due to their toxicity and environmental contamination potential.

We agree that the evidence presented in the DTSC product listing shows textile and leather treatments containing PFAS pose human health hazards, especially given the proximity to the human body. Further, this is more evident with widespread use in the textiles industry, along with acute exposure via inhalation during the application process of these chemicals by workers and consumers applying the chemicals themselves, particularly in [communities already overburdened](#) by multiple sources of pollution. We previously recommended the product definition include treatments containing PFAS added to textiles and leathers in the manufacturing process to avoid a potential unintended consequence of encouraging producers to add the chemical coatings earlier in the supply-chain.

The actions by SCP on PFAS are aligned with other State and Federal government actions. Since the initial SCP hearing in January 2020, California has passed two precedent-setting pieces of legislation

that ban PFAS in children's products and for use on foodware. There is also a PFAS phase-out in [Maine](#) and a comprehensive [national strategy](#) to confront PFAS pollution developed by the EPA. New York and Vermont have also proposed legislation banning or phasing out PFAS used in aftermarket treatments. The two California bills that were signed by Governor Newsom in October 2021, AB 652 (Friedman) and AB 1200 (Ting), had nearly unanimous support, showing this as an immediate public health priority for policy makers.

The ban on PFAS for children's wear and the phase-out for products sold in Maine will likely lead to smaller number of manufacturers needing to conduct the Alternative Analyses under the SCP determinations if they are already stopping use. This could lead to less costs than predicted in the economic impact statement.

The undersigned organizations are very concerned with PFAS and will stay involved during the SCP regulatory process to ensure the public ultimately has more limited exposure to this chemical class, which contains known hazardous chemicals.

Thank you again for the opportunity to weigh-in on how to better protect human health and safety in California. PFAS need to be addressed immediately as they are an impediment to achieving a circular economy.

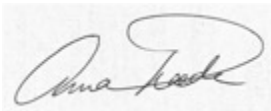
Sincerely,



Doug Kobold, Executive Director
California Product Stewardship Council



Sarah Doll, National Director
Safer States



Anna Reade, Staff Scientist
Natural Resources Defense Council



Nancy Buermeier, Senior Policy Strategist
Breast Cancer Prevention Partners



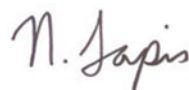
Andria Ventura, Legislative and Policy
Director
Clean Water Action



Heidi Sanborn, Executive Director
National Stewardship Action Council



Sharyle Patton
Director, Health and Environment Program
Commonwealth Biomonitoring Resource
Center



Nick Lapis, Director of Advocacy
Californians Against Waste



Bill Allayaud, CA Director of Government
Affairs
Environmental Working Group



Laurie Valeriano, Executive Director
Toxic-Free Future



Beth Rattner, Executive Director
Biomimicry Institute



Rebecca Burgess, Executive Director
Fibershed



Nicholas Brown, Policy Director
Fashion Revolution, USA



Connie Ulasewicz, Founder
CBUProductions



Sarah Packer, Interim Director, Built
Environment Program
Center for Environmental Health