



January 14, 2020

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 Regulate Treatments Containing PFAS for Use on Food Packaging as Priority Products Under the Safer Consumer Products (SCP) Regulations

Dear Safer Consumer Products (SCP) Program:

The undersigned organizations **strongly urge DTSC to regulate food packaging that contains PFAS as Priority Products**. This will protect California's citizens from the known hazards associated with exposure to this class of chemicals.

DTSC has identified a high prevalence of food packaging that contains PFAS chemicals. Congruent to these findings, The Center for Environmental Health has tested 203 molded fiber food packaging products, and found that 94% contain these chemicals. This includes bowls, clamshells, plates, trays, cups, and cup lids. These products pose a risk to the public because they expose consumers to PFAS through ingestion and dermal exposure as they eat, and through contamination of water and food products throughout their life cycle.

Exposure to PFAS has been linked to a variety of cancers, thyroid disease, and decreased fertility, among other serious health issues. Of note, PFAS are endocrine disrupting chemicals. The endocrine system in the human body regulates hormones that shape behavior, physical and mental development, intelligence, and more. Even exposure to minute amounts of PFAS are harmful because the endocrine system is very

sensitive. Children, babies and fetuses are especially susceptible to the harmful effects of PFAS because their bodies develop rapidly. **Any amount of PFAS should be considered harmful.**

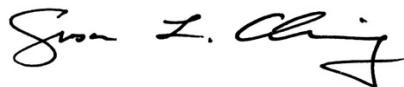
PFAS chemicals are extraordinarily persistent in the environment and proliferate into our food system. When food packaging is composted, PFAS chemicals are not broken down, and are thus incorporated into the compost. Farmers use who use this compost in their fields can inadvertently contaminate their groundwater, crops, and livestock.

Food packaging that contains PFAS is hazardous to California's public health, water supplies, and food production. The technology to produce PFAS-free food packaging already exists. Multiple companies currently produce food packaging that use alternative methods to impart grease and water resistance, and the industry is following their lead. California cannot wait any longer. We strongly urge DTSC to take action against this class of toxic chemicals, and ban them from use in any food packaging sold in California.

We appreciate the opportunity to comment on this issue.

Sincerely,

Sue Chiang, Pollution Prevention Director
Center for Environmental Health

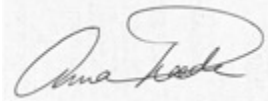


Heidi Sanborn, Executive Director
National Stewardship Action Council

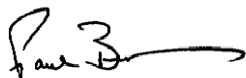
Andria Ventura, Toxics Program Manager
Clean Water Action



Anna Reade, Staff Scientist
National Resource Defense Council



Paul Burns, Executive Director
Vermont Public Interest Research Group



Sharyle Patton, Director
Commonwealth Health and Environment Program

Janet Nudelman, Director of Program and Policy
Breast Cancer Prevention Partners



Bill Allayaud, California Director of Government Affairs
Environmental Working Group



Doug Kobold, Executive Director
California Product Stewardship Council



Mark S. Rossi, PhD, Executive Director
Clean Production Action