

Ted Brookes

Dear WA Department of Ecology,

Thank you for your work to protect communities and the environment from toxic PFAS chemicals through many different mechanisms, including the PFAS Chemical Action Plan, Safer Products for WA implementation, and now the PFAS Food Packaging Alternatives Assessments.

As a person of faith, it is important to me that we do all we can to protect communities from toxic contamination and its negative health effects, as well as tread lightly on our sacred earth.

In 2018, concerned WA State citizens, including many from the Faith community, environmental groups, and Native American tribes successfully advocated for the removal of toxic, cancer-causing PFAS chemicals from all food packaging. Prior to the passage of that particular bill, there same citizens urged a ban on PFAS chemicals in the manufacture of children's clothing and furniture upholstery. The bottom-line objective of this activism was to totally eliminate PFAS chemicals in the manufacture of products directly used by humans in their daily lives. There was no equivocation in the desire to remove all PFAS chemicals from food packaging in an orderly, phased-out, all-inclusive manner. It makes no sense to approach the task in a piece-meal manner, including only a small segment of subject products in the removal process or to extend the timeframe in which all of these products will be considered for elimination.

The Dept. of Ecology's current plan only regulates a portion of the total products on the market that use PFAS chemicals. Further, the time line required for retailers to stop using these products is far too long to have the desired, timely health and ecological impact on society and our environment. Alternatives to PFAS chemicals in food packaging already exist. In fact, some manufacturers have begun transitioning to these alternatives. A better plan for the Dept. of Ecology would be to collaborate with manufacturers to come up with an end-date in which the transitioning to the use of alternatives is complete and the use of all PFAS chemicals in food packaging is totally eliminated. The Dept. of Ecology should be tasked with monitoring the progress of the plan and ensure its compliance.

With the upcoming second alternatives assessment for PFAS in food packaging, time is of the essence. It has already been three years since we passed the PFAS food packaging legislation in 2018. While we wait for this bill to be implemented, retailers across the country continue to voluntarily stop using food packaging with PFAS, demonstrating that alternatives are widely available. Additionally, cities like Seattle that require entirely compostable food packaging, which does not contain PFAS, also confirm that these products exist and are widely used.

Please consider the abundant options and widespread circulation of various PFAS-free food packaging being used in Seattle and voluntarily by many retailers elsewhere as evidence that there are suitable and safe alternatives available.

I also ask that you accelerate the timeline for the alternatives assessment process because of serious environmental justice concerns. The Daikin America plant in Decatur, Alabama, where PFAS for food packaging is produced, has a legacy of significant PFAS contamination of land and drinking

water. People of color comprise 78% of the exposed community living within three miles of the plant. We have a moral responsibility to protect communities both in Washington and where PFAS is produced outside of the state. Removing PFAS from all food packaging as soon as possible is imperative for the health of communities everywhere.

I appreciate that Washington is a leader in toxic chemical reform. Please continue to set a high standard with swifter implementation of the second PFAS Food Packaging Alternatives Assessment.

Sincerely,
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