

July 9, 2021

Rae Eaton
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504
RE: Draft Food Packaging Applications and Candidate Alternatives to PFAS for the Second Alternatives Assessment

Dear Ms. Eaton,

On behalf of the 14,599 Washingtonians who are employed by the plastics industry, I am writing to respectfully express our concerns with the draft Food Packaging Applications and Candidate Alternatives to PFAS for the Second Alternatives Assessment. The Plastics Industry Association (PLASTICS) is the only trade association that represents the entire supply chain of manufacturers of all plastic products and packaging. We are firmly committed to manufacturing products that meet the environmental, social, and business needs of consumers.

While we recognize the need to limit PFAS exposure in the public, we are concerned by the language which appears to not consider plastic as an acceptable alternative material. The process of the Alternatives Assessment is to consider PFAS-free materials which have similar performance, cost, and availability characteristics. Prohibiting an entire material class from being considered as an alternative that could easily meet these characteristics is out of scope of the alternative assessment process defined in the legislation. The Executive Order cited as a reason for this decision by the department applies only to the state purchasing process and should not apply in this case.

Additionally, the draft states most single-use plastics are not recycled but does not cite data for the fate of the alternatives proposed. Popular alternatives like compostables need industrial facilities to be properly managed and that infrastructure is severely lacking. This means most compostables are landfilled where they sit and do not decompose. Precluding plastics from the assessment will have several negative consequences. Namely, alternatives cost more for small businesses (94% and more in some places) and the environmental impacts of alternatives like paper packaging or metal are more resource-intensive and emit more carbon emissions.

Legislation recently passed will help create policies to manage concerns over the use of single use plastics. New types of recycling processes can more efficiently recover useful material and help boost re-use. Concerns about the environmental impacts of plastic use are out of scope with this process and should be held separately from concerns about minimizing exposure of PFAS chemicals in food service ware.

Thank you for the opportunity to provide comment. If you have any questions, please do not hesitate to contact me at scrawford@plasticsindustry.org.

Sincerely,



Shannon Crawford
Director, State Government Affairs
Plastics Industry Association