

ERM

Hello,

I am providing comments on the recently published Preliminary Draft Rule for Chapter 173-337 WAC, which is proposing to add PFAS restrictions or reporting requirements for specified consumer products.

The Dept. of Ecology (Ecology) has not provided clear definitions for the terms ‘apparel’ and ‘textile’ and has relied upon defining these terms through statements of applicability and varying example product lists in documents released to the public (i.e., the Preliminary Draft Rule, the Regulatory Determinations Report to the Legislature, and webinar presentation materials).

I am requesting that the terms ‘apparel’ and ‘textile’ be clearly defined in the final rule, and that they are aligned with other state laws so that interested parties are complying with a regulatory landscape as harmonized as possible. Suggested definitions of these terms from current state law include:

- **California - HSC § 108970**
- Colorado - C.R.S. § 25-15-603
- Vermont - 9 V.S.A. § 2494