



July 17, 2025

Stacey Callaway
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Dear Ms. Callaway,

Seattle Public Utilities (SPU) appreciates the opportunity to submit comments on the Washington State Department of Ecology's (Ecology) proposed rulemaking for Chapter 173-333 WAC, addressing per- and polyfluoroalkyl substances (PFAS) in consumer products. As an end receiver of PFAS, limiting these chemicals at the source prevents their entry into waste streams and public lands. This safeguards our communities and mitigates the need for complex, costly remediation, protecting both the environment and the ratepayers who ultimately fund cleanup efforts.

SPU has tracked emerging contaminants like PFAS and their associated regulations for decades. The widespread presence of PFAS in goods makes reactive elimination immensely challenging and expensive, increasing the likelihood of environmental and community impact. Addressing PFAS at the source shifts the responsibility for these impacts from utilities and ratepayers to producers, which is crucial for the long-term protection of our water and land resources and public health. Producers must be engaged and compelled to remove PFAS from use where alternatives exist.

Ecology's restrictions on PFAS in consumer products represent a crucial and commendable step toward this goal. Removing several primary PFAS sources from production and distribution within Washington State directly reduces the potential impacts and burden of PFAS on our residents. By requiring reporting and notification of PFAS content in other products, consumers can opt to protect their communities by "voting with their wallets," potentially accelerating the shift to non-fluorinated ingredients and further reducing environmental impacts.

As highlighted in our January 2024 comment letter, SPU strongly supports Ecology's science-based, transparent, and protective approach to addressing PFAS. While SPU offers enthusiastic support for the proposed restrictions, we advocate for more rapid and expansive action to address the pervasive nature of these chemicals. We urge Ecology to consider expediting further restrictions on PFAS use, applying a higher standard for "essential use exemptions," and moving as quickly as possible to limit the distribution and use of unnecessary toxic chemicals within Washington.

We want to thank the Department of Ecology for its commitment to controlling toxic substances and for taking this crucial step with the proposed rulemaking regarding PFAS restrictions in consumer products. We understand that the transition away from PFAS demands collaboration and innovation. SPU is fully prepared to partner with Ecology, goods manufacturers, and other stakeholders to implement these regulations effectively. Looking ahead, we strongly encourage Ecology to pursue even more comprehensive measures to address PFAS sources and prevent PFAS contamination throughout Washington.

Thank you for considering our comments.

Sincerely,

A blue ink signature of Andrew Lee, consisting of a stylized, cursive script.

Andrew Lee
General Manager/CEO
Seattle Public Utilities