

July 18, 2025

Stacey Callaway
Department of Ecology
Hazardous Waste & Toxics Reduction Program
300 Desmond Drive SE
Lacey, WA 98503

Dear Ms. Callaway,

Thank you for the opportunity to provide input during the Safer Products for Washington Cycle 1.5 PFAS rulemaking. Washington Conservation Action Education Fund (WCA) is a 501(c)(3) organization founded in 1967 as Washington Environmental Council. Our mission is to develop, advocate for, and defend policies that ensure environmental progress and justice by centering and amplifying the voices of the most impacted communities. We are committed to eliminating toxic chemicals in our communities and environment.

WCA strongly supports Ecology's draft rule to restrict the intentional use of PFAS in apparel and accessories, automotive washes, and cleaning products. However, we do not agree that a reporting requirement for nine other product categories, especially those where safer alternatives already exist, will protect human health and the environment. Reporting requirements may increase transparency, but they do not stop the manufacture of PFAS containing products used daily in homes and outdoors.

Cookware and kitchen supplies and ski waxes are two categories where PFAS-free or safer alternatives exist, but only a reporting requirement is proposed. Restricting the intentional use of PFAS in these products would stop the exposure pathway at the source rather than shifting the responsibility to understand the risk of PFAS exposure onto everyday consumers.

Cookware and kitchen supplies

Customers should not bear the burden of protecting themselves from harmful chemicals in everyday products. Recognizing this, Washington passed the Cookware Containing Lead law to prohibit the sale of cookware containing lead in our stateⁱ. "You should not need to be a scientist to purchase safe cookware," said Maythia Airhart, Director of the Hazardous Waste Management Program in King County, underscoring the need for strong consumer protections.

Connecticut, Maine, Minnesota, Rhode Island, and Vermont have adopted legislation to restrict PFAS in cookware over the next two yearsⁱⁱ. Several more states have



introduced bills to accomplish the same goal. Given that stainless steel and cast-iron cookware are widely recognized as safer alternatives, and other states are already moving to restrict PFAS in this product category, we urge Ecology to go beyond reporting requirements and implement restrictions.

Ski waxes

Earlier this year, France enacted a law to prohibit the use of PFAS in several products, including ski waxes, by January 1, 2026ⁱⁱⁱ. The International Ski and Snowboard Federation banned PFAS waxes at the start of the 2023/2024 winter season, meaning that professional athletes would need to comply to compete^{iv}.

To meet growing demand for PFAS free outdoor equipment, brands have begun reformulating their products. Swix, a Norwegian company that manufactures winter sports equipment, stopped selling PFAS-containing waxes by the 2021/2022 winter season, replacing them with PFAS-free alternatives^v. This is just one example of a PFAS-free ski wax currently on the market. We understand that access to formulation disclosures has been a barrier, however we urge Ecology to identify a path forward for working with manufacturers to determine if these products are safer alternatives.

Nikwax, a company specializing in PFAS-free waterproofing for outdoor clothing and gear, makes a waterproofing product for ski skins that was already identified as a safer, PFAS-free alternative in Ecology's May 2024 Technical Supporting Documentation for Regulatory Determinations Report to the Legislature^{vi}.

For other product categories with reporting requirements, Ecology must its authority under the Safer Products for Washington Law to identify alternatives quickly. The effects of PFAS on human health and the environment are far reaching – PFAS bioaccumulate in humans, animals, and the environment, are linked to cancer, reproductive issues, developmental delays, and are toxic to fish. Restricting the intentional use of PFAS, will keep our communities, wildlife, and environment healthier and safer.

Thank you for considering these comments.

Katie Byrnes

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Toxics & Stormwater Senior Policy Manager



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ⁱ <https://kingcounty.gov/ko-kr/dept/dnpr/about-king-county/about-dnpr/newsroom/2024-news-releases/03-29-lead-contaminated-cookware>

ⁱⁱ <https://www.bclplaw.com/en-US/events-insights-news/pfas-in-cookware-state-by-state-regulations.html>

ⁱⁱⁱ <https://www.cirs-group.com/en/chemicals/france-enacts-pfas-ban-comprehensive-restrictions-on-forever-chemicals-to-take-effect-from-2026>

^{iv}

<https://www.sciencedirect.com/science/article/pii/S2772416624000858#:~:text=Finally%2C%20the%20International%20Ski%20and,the%20risk%20to%20human%20health.>

^v <https://swixsport.com/us/sustainability/pfas>

^{vi} <https://apps.ecology.wa.gov/publications/documents/2404024.pdf>