



November 17, 2017

Kara Steward  
Washington State Department of Ecology  
Hazardous Waste & Toxics Reduction Program

Re: Perfluorinated Alkyl Substances Chemical Action Plan Chapters (PFAS CAP)

Dear Ms. Steward,

On behalf of the American Forest & Paper Association (AF&PA), I am writing to express our concerns related to the PFAS CAP and the impact on our industry in Washington. Many PFAS chemicals enhance the function of products used by Washington consumers and industry rely upon. While a small group of PFASs have been associated with water contamination issues in Washington, intentionally-added long-chain fluorinated chemicals (C8 and above) should be the target of the CAP, not all perfluorinated chemicals, which is overly broad and could result in banning materials already regulated and approved by the US FDA.

AF&PA serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative - Better Practices, Better Planet 2020. The forest products industry accounts for approximately 4 percent of the total U.S. manufacturing GDP, manufactures over \$200 billion in products annually, and employs approximately 900,000 men and women. The industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 45 states.

AF&PA recommends that in the Health section of the PFAS CAP, the Department of Ecology not include short-chain PFAS on the basis that they are not persistent, bioaccumulative toxins (PBTs) as defined in Chapter 173-333 Washington Administrative Code. The chemical action plans should identify actions the state may take to reduce threats posed by persistent, toxic chemicals found in flame retardants, known as polybrominated diphenyl ether (PBDEs). While Chapter 173-333-420(1)(b) allows for examination of "sources [which] may include other chemicals or products that are known or suspected to degrade to the chemical included on the PBT list," short-chain PFASs are not precursors to PBTs central to the exposure-based language which authorized the use of CAPs in 2004 Executive Order 04-01.

The toxicological and environmental characteristics of this small group of "long chain" PFASs are not representative of the broad range of substances that can be described as PFASs. A large body of scientific data demonstrates that the toxicological and environmental concerns associated with these "long chain" chemicals are not associated with fluoropolymers or the "short-chain" "C6" chemistry. Because of the diverse

characteristics of the various chemistries that fall within the broad class of “PFAS” chemicals, it is not appropriate, from a scientific standpoint, to make the broad and inaccurate assertion that all PFASs are the same or similar. It is also inappropriate, from a public policy perspective, to impose one-size-fits-all policies or regulations on all PFAS chemicals. Instead, it is essential that such policies and regulations adequately take into account each substance’s specific properties, socio-economic value, and risk profile.

In response to public concerns that arose over PFOA and PFOS more than a decade ago, companies developed new products, including PFASs based on C6 short chains, which provide comparable properties and benefits to long-chain products, at similar concentrations, with much improved health and environmental profiles.

Recently, some groups have raised concerns about the role some products play in exposure to PFAS, with a particular focus on firefighting foam (AFFF) and food packaging, supported by claims that non-fluorinated alternatives are available for these applications. These concerns are misplaced when it comes to products that incorporate short-chain C6-based chemistries because a large body of data supports their safety. Moreover, claims asserting the readily availability of non-fluorinated alternatives fail to consider the generally inferior performance of those “alternatives.” For example, non-fluorinated alternatives for food packaging do not provide the same oil and grease protection properties as FDA-approved C6-based fluorotelomer products and are more expensive and of greater bulk, contributing to increased disposal costs and volume of waste produced.

Unfortunately, all PFAS manufacturers globally have not made the same stewardship commitments, and the production, use, and global trade of PFOA, PFOS, and related long-chain PFAS continues in China, India, and Russia with little, if any, restriction. Further, the import of consumer articles made with or containing these long-chain PFAS is permitted in the U.S., leading to the continued contribution of these substances into Washington’s environment.

AF&PA supports the comments submitted by the Association of Washington Business that discussion of analytical results should be limited to Environmental Protection Agency-approved and well-researched analytical test methods.

Thank you for your time in reviewing AF&PA’s preliminary comments on the PFAS CAP. We look forward to continuing our work with the state of Washington. Please feel free to contact Terry Webber, Director, Government Affairs, AF&PA at (202) 463-2732 or [terry\\_webber@afandpa.org](mailto:terry_webber@afandpa.org) for further information.

Sincerely,



Elizabeth Bartheld  
Vice President, Government Affairs