

SUBJECT: *Updated Ecology report on priority consumer products*

Dear stakeholders,

Thank you for your comments concerning our [draft report on priority consumer products](#). **We are making some important changes to the final draft report based on the feedback received and additional scientific findings.** We want to make sure you are aware of the proposed changes and that we will continue to seek your valued input as we implement RCW 70.365.

Our team at Ecology reviewed comments and listened to concerns from stakeholders about the potential impacts some of these chemicals have on Washington populations. Based on that feedback and additional research, Ecology is expanding three product categories and adding two new products.

Expanding priority product categories

- Aftermarket carpet treatments with PFAS (per- and polyfluoroalkyl substances) will expand to include aftermarket stain and water resistance treatments for fabric and leather products.
- Cosmetic fragrances with phthalates will expand to include personal care and beauty products.
- Printing inks with PCBs (polychlorinated biphenyls) will expand to include paints.

Expanding these product categories means that in our next phase of work, we will assess the feasibility and availability of safer alternatives for not only cosmetic fragrances, carpet treatments, and printing inks, but also most personal care products, most stain and water resistance treatments, and most paints.

Why are we expanding these categories

1. Stain and water resistance treatments for fabric and leather products

Stakeholders expressed concern that carpet is not the only source of PFAS exposure, and offered many helpful suggestions for future work. Our research and evaluations within this expanded category will help us address additional routes of PFAS exposure.

2. Personal care and beauty products

The exposure pathways for fragrances and personal care products are similar because both are applied directly to the skin. People who use scented personal care products have higher concentrations of phthalates in their bodies. Expanding this category gives us an opportunity to potentially reduce phthalate exposures from a variety of products.

3. Pigments in paints

Stakeholders expressed concerns that paints, in addition to printing inks, account for a significant portion of the exposure pathways to inadvertent PCBs (iPCBs) found in pigments. Studies suggest paints use a slightly higher percentage of pigments compared to inks. Based on our research, we are expanding this product category to include paints. This expansion provides an opportunity to reduce more exposures from iPCBs.

New priority products

We are adding leather and textile furnishings and recreational polyurethane foam to our list of priority products.

Recreational polyurethane foam

Community members suggested that we consider more products with flame retardants. That feedback, combined with additional research, led us to add recreational foam products to our list. This category includes foam pits, mats, spotting blocks, and other products with polyurethane foam used in recreational and athletic facilities. Research shows that people have higher exposures to flame retardants after spending time in foam pits. This product is particularly relevant for children, who spend more time in recreational and athletic facilities.

Leather and textile furnishings

There is a spotlight on PFAS exposure and environmental contamination both nationally and in our state. EPA estimated that leather and textile furnishings were one of the most prevalent sources of PFAS in our homes. During the public comment period for our draft report, we received hundreds of comments requesting that we add PFAS in textiles to our list of priority products. Based on additional research, we are adding a new category for leather and textile furnishings to address more sources of PFAS exposure.

Product definitions and scope

As a reminder, this priority product listing is **not** a regulatory decision. This is not a risk assessment. We have not evaluated risks from these products. In the next phase of Safer Products for Washington, we will evaluate whether safer alternatives are available and feasible, and determine needed regulatory actions. We expect that for some product categories, safer alternatives may only be available for a subset of products. By expanding our scope now, we open up opportunities to reduce exposure to priority chemicals when safer alternatives are available.

We plan to work with stakeholders to identify the opportunities and challenges within each of these product categories as we conduct that process. Any potential regulatory actions will have clearly defined product scopes that we will develop with our stakeholders. Possible future regulatory restrictions or reporting requirements will undergo both a legislative review and a formal rulemaking process.

We received more than 1,300 comments on our draft report, the majority of which came from the public. Businesses, manufacturers, environmental and public health advocacy organizations, scientific experts, community groups, local government, and public health agencies also submitted feedback. Public comments plus additional Department of Health and Ecology research informed the expanded categories in the final draft report.

Thank you for your engagement with [Safer Products for Washington](#). **If you have questions about the changes we are making to the report, reach out to us at SaferProductsWA@ecy.wa.gov.**

Thank you,

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