



April 13, 2020

Department of Toxic Substance Control (DTSC)  
 Attn: Safer Consumer Products (SCP) Program  
 1001 I Street  
 Sacramento, CA 95814

Submitted via online portal at <https://calsafer.dtsc.ca.gov/>

**Re: Support Listing Carpets and Rugs Containing Perfluoroalkyl or Polyfluoroalkyl Substances as a Priority Product**

Dear Safer Consumer Products (SCP) Program:

The undersigned organizations on this letter **strongly support listing carpets and rugs containing perfluoroalkyl or polyfluoroalkyl substances (PFAS) as Priority Products** under the SCP regulations. California has a responsibility to protect residents from toxic and bioaccumulative chemicals entering the market and producers should take responsibility to ensure safe handling of the materials at their end-of-life, especially ones which pose human health risks if not properly managed.

The evidence presented by DTSC shows carpet and rugs with added PFAS pose human health hazards. The class of PFAS in carpets and rugs contain chemicals connected to serious health impacts, including cancers, liver and kidney malfunction, thyroid diseases, delayed puberty, early menopause in women, reduced immune system responses in children, birth defects, reproductive and developmental toxicity, systemic toxicity, and elevated cholesterol.<sup>1</sup> Both the scientific community and general public are justifiably very concerned with PFAS being found in 6 out of 12 tested U.S. carpet<sup>2</sup>, in human bodies<sup>3</sup> and in water samples.<sup>4</sup>

Lack of action at the State level is driving local jurisdictions to ensure the public has limited exposure to carpet containing this chemical class, such as the Woodland Unified School District who [implemented a ban on carpet with PFAS](#) and San Francisco's [Green Procurement Policy for carpet](#). Home Depot and Lowe both announced they will [no longer sell carpets](#) containing PFAS starting January 2020.

<sup>1</sup> Magensen, U, et. al., (2015). Structural equation modeling of immunotoxicity associated with exposure to perfluorinated alkylates. Environmental Health 14:47. See also <https://www.atsdr.cdc.gov/toxprofiles/TP.asp?id=1117&tid=237>.

<sup>2</sup> Changing Markets (2018). Testing Carpet for Toxics: Chemicals affecting human health and hindering the circular economy. Found at: [http://changingmarkets.org/wp-content/uploads/2018/12/Carpets-Report-PR\\_final.pdf](http://changingmarkets.org/wp-content/uploads/2018/12/Carpets-Report-PR_final.pdf)

<sup>3</sup> See [https://www.cdc.gov/biomonitoring/PFAS\\_FactSheet.html](https://www.cdc.gov/biomonitoring/PFAS_FactSheet.html) and Fourth National Report on Human Exposure to Environmental Chemicals Updated Tables, March 2018, Volume One at [https://www.cdc.gov/exposurereport/pdf/FourthReport\\_UpdatedTables\\_Volume1\\_Mar2018.pdf](https://www.cdc.gov/exposurereport/pdf/FourthReport_UpdatedTables_Volume1_Mar2018.pdf).

<sup>4</sup> Mendez, E. (2019). San Jose Water Company shut off wells contaminated with PFAS chemicals. San Jose Spotlight accessed at <https://sanjosespotlight.com/san-jose-water-company-shut-off-wells-contaminated-with-pfas-chemicals/>

The stewardship organization running the program in California, Carpet America Recovery Effort (CARE), cited the lack of state guidelines for handling carpet with PFAS as a reason to not address concerns with PFAS brought up by members of the California Carpet Stewardship Advisory Committee (AC). On July 31, 2019, the AC voted on and passed a recommendation that CARE address PFAS as a measure to reduce environmental contamination and exposure during end-of-life management for carpet handled under the program. Unfortunately, CARE denied the request in August 21, 2019, stating “there are no specific guidelines/requirements for the use of [post-consumer carpet] materials delineated by statute.” The carpet industry lobbied against transparency on the use of PFAS in carpet by opposing the eco-modulated fee in AB 729, passed in 2019, because it would impact the cost and public appearance of carpets with more toxics. We hope the outcome of the SCP process includes guidelines for safe handling of carpet and rugs with PFAS and the safety of the workers.

Thank you again for the opportunity to protect human health and safety in California. PFAS need to be addressed immediately as they are an impediment to achieving a circular economy.

Sincerely,



Doug Kobold, Executive Director  
California Product Stewardship Council



Heidi Sanborn, Executive Director  
National Stewardship Action Council



Alicia Culver, Executive Director  
Responsible Purchasing Network



Jennifer Lombari, Interim General Manager  
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Andria Ventura, Toxics Program Manager  
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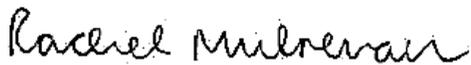
Kevin Bell, P.E., Deputy Executive Director  
Western Placer Waste Management Authority



Nick Lapis, Director of Advocacy  
Californians Against Waste



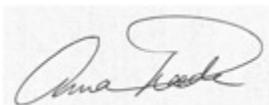
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