February 23, 2022

Dear Chair Stephenson and Commerce Finance and Policy Committee Members:

I am writing on behalf of the North Star Chapter of Sierra Club in support of the following bills:  
 HF2952 PFAS in Ski Wax   
 HF2906 PFAS in Cosmetics  
 HF2907 PFAS in Cookware

PFAS chemicals are very persistent and do not break down naturally. They are toxic, bioaccumulate in our bodies, and are linked to serious health concerns. People who live near or work at PFAS production or manufacturing sites are often at highest risk but there is also risk from using and disposing of PFAS-treated products. Once in the environment, PFAS accumulate and circulate. They are expensive to manage and difficult, if not impossible, to remove and taxpayers are paying the costs.

With every PFAS-treated product that is made, the PFAS burden increases. Filtering and re-releasing PFAS back into the environment is not a solution. Technologies that attempt to destroy PFAS are energy intensive and expensive. One of the most inexpensive and effective steps we can take to save money and protect our health and the environment is to use PFAS only when it is essential. PFAS use in ski wax, cosmetics, and cookware is not essential.

PFAS in Ski Wax  
“Flouro” ski waxes do a great job of repelling water and dirt and allow the skis to glide more easily over snow, especially in warm, wet snow conditions. They can give skiers an edge in competitive races. However, wax can flake off the skies contaminating snow, soil, and groundwater. Wax can have high concentrations of PFAS, and a recent study showed long-chain and short-chain were both still being used. In addition, handling fluorinated ski wax and breathing fumes is a health hazard especially for ski wax technicians who may be exposed for long periods.

SWIX, one of the top manufacturers of ski wax, no longer manufactures or imports fluorinated waxes. Other companies are following suit as ski associations and ski races around the world are starting to ban fluorinated ski wax. The European Union and the state of Vermont banned PFAS in ski wax in 2021. The American Birkebeiner, the largest cross-country ski race in North America does not allow PFAS wax. Also, the US Ski and Snowboard Association and the Minnesota State High School Nordic Ski Coaches Association have banned all fluoro waxes at events.

While it is encouraging that PFAS use is being banned and that alternative waxes are available, without a ban on manufacturing, fluorinated ski wax will continue to be produced and used especially by people who are unaware of the risks to their own health and the environment.

PFAS in Cosmetics  
While ski wax manufacturers advertise ‘fluoro’ as a prized ingredient, the cosmetic industry’s use of PFAS is flying under the radar. A 2021 study done by Notre Dame looked at 231 cosmetics and found PFAS in more than half, yet most women are unaware of that. The study found that 63% of foundations,

55% of lip products, and 47% of mascara had high levels of fluorine. A study testing ‘green’ beauty products found similar results. Considering that people apply cosmetics directly to their skin and often use them daily for the entire day, that is a great concern. These chemicals can be absorbed through the skin and tear ducts and can be ingested. Users may consume up to several pounds of cosmetic throughout their lives. Besides the direct exposure, PFAS can wash off and end up in drinking water.

In 88% of tested products, the label did not disclose PFAS. Products marketed as ‘long-lasting,’ ‘water-resistant,’ and ‘waterproof’ had the highest levels of PFAS. Several brands had a mix of products with and without PFAS, possibly due to supply chain differences or different manufacturing plants. The properties of making foundation smooth and silky or lipstick last longer are not worth the risk, especially when consumers are so unaware they are being exposed to a toxic chemical.

PFAS are also endocrine disrupting chemicals (EDCs) that can interfere with our hormone system and can have an impact at very low doses. EDCs are linked to low-birth-weight babies, vaccine issues, and infertility. A recent study showed that pregnant women who were regularly exposed to a mixture of EDCs, which is true of cosmetics, put their child at risk of delayed language development.

PFAS in Cookware  
Cookware is one the first areas where PFAS was used and continues to be one of the biggest markets. A 2020 study found that 79% of the tested nonstick cooking pans and 20% of the baking pans were coated with PTFE, also known by the brand name Teflon™. Product labels are often confusing and misleading, stating what is not in the product rather than what is included. Products labeled PFOA-free were usually coated with PTFE.

Even though it is possible to make cookware without PFAS, there are some items where it is impossible for consumers to avoid nonstick items because no manufacturer offers them. Small appliances like air fryers, griddles and waffle irons are examples. These are also the type of item that usually comes with a warning not to overheat the product. The American Cancer Society noted a risk from breathing fumes from over-heated Teflon coated pans. Nonstick pans may be convenient, but they are not necessary. Alternatives are readily available for pans and should be, but often aren’t, for bakeware and small appliances.

In 2021, Rep. Wazlawik authored a bill to ban PFAS in food packaging which is critical to reducing the amount of PFAS leaching into our food. Eliminating PFAS in cookware is an important next step to reduce our exposure to PFAS through food. Also, many cities are working to reduce food waste going to landfills and eliminating PFAS in cookware will also minimize the contamination of compost.

PFAS treated products are a threat to our health and the environment. Non fluorinated alternatives are or could be available for cosmetics, cookware, and ski wax. Consumers often do not realize the products they are buying contain PFAS and are a risk. Even when they do, it is difficult to identify and avoid PFAS-treated products. Consumers should have confidence that the products they find on the shelf are safe for them to buy. Toxic chemicals that do not degrade should only be produced and used in products where it is critically important. That does not include ski wax, cosmetics, and cookware.

Sincerely,

Lori Olinger  
Chair, Zero Waste Task Force  
Sierra Club North Star Chapter

[Endocrine-disrupting chemicals: implications for human health](https://www.thelancet.com/journals/landia/article/PIIS2213-8587(20)30129-7/fulltext)  
[Ski wax use contributes to environmental contamination by per- and polyfluoroalkyl substances](https://www.sciencedirect.com/science/article/pii/S0045653520322736)  
[Fluorinated compounds in North American cosmetics](https://pubs.acs.org/doi/pdf/10.1021/acs.estlett.1c00240)  
[Green beauty product testing finds more than 60% have PFAS indicators](https://www.ehn.org/pfas-in-makeup-2655912186/makeup-a-surprising-pfas-hotspot)  
[What’s Cooking? PFAS and Other Chemical Hazards in Nonstick Cooking and Baking Pans](https://www.ecocenter.org/healthy-stuff/pages/what%27s-cooking)  
[Perfluorooctanoic Acid (PFOA), Teflon, and Related Chemicals](https://www.cancer.org/cancer/cancer-causes/teflon-and-perfluorooctanoic-acid-pfoa.html)