



April 5, 2022

To: Bluesign

cc: Astral, Brooks Sports Inc., Camelbak, Columbia Sportswear Company, Amer Sports, Eagles Nest Outfitters Inc., Eddie Bauer LLC., Eileen Fisher Inc., Everlane, Faherty Brands, Gordini USA Inc., Kammok, L.L. Bean Inc., Lands' End Inc., The Reformation, NEMO Equipment Inc., Nike Inc., ORVIS, Osprey Packs Inc., Outdoor Research LLC., Outerknown LLC., Patagonia Inc., Peak Design, Recreational Equipment Inc., RHONE, Ruffwear Inc., The Burton Corporation, The North Face Inc., Wilson Sporting Goods Co.

Dear Bluesign,

Your textile standards are failing to address the major health and environmental threats posed by per-and polyfluoroalkyl substances (PFAS). Known as “forever chemicals” because they don’t break down in the environment, PFAS have been linked to a wide range of [serious health problems](#) including cancer, hormone disruption, immune suppression and reproductive problems.

Currently, the Bluesign standards only address a small handful of the [12,000+ PFAS chemicals](#) that have been identified. Yet scientists from around the world are [calling on governments](#) to eliminate the [entire class of PFAS](#) due to their toxicity and extreme persistence. Earlier this year, a [UN Human Rights Commission report](#) also urged countries to ban all uses of PFAS. The Bluesign certification is designed to give consumers confidence in what they are buying. Therefore, it is important that you hold your membership to the highest possible standards and reflect the growing consensus that the entire class of PFAS must be phased out.

As such, Bluesign should require its clients to stop adding PFAS to their products and eliminate PFAS use during all phases of the manufacturing processes in order to obtain certification. To address contamination issues, Bluesign should also require its clients to test for the presence of total fluorine or organic fluorine at the lowest level that is technically achievable through validated methodologies. For example, some labs are currently able to test for total organic fluorine at a detection level of 300 ppb. Importantly, Bluesign must update *all* of its certifications to address the entire class of PFAS chemicals. Revising a certification only for children's products or for "gold" levels of certification, for example, will not be sufficient to address the threat of PFAS.

Nearly every American has [PFAS in their body](#). PFAS are found in [blood](#), [breast milk](#) and even the [umbilical cord blood](#) of newborn babies, and the detections of current-use PFAS compounds are [doubling in breast milk every four years](#). Scientists estimate that over [200 million Americans](#)—more than 60% of the country's population—are likely drinking water contaminated with PFAS. States and localities are spending [hundreds of millions of dollars on](#) cleaning up PFAS pollution in their communities and providing safe drinking water for their residents. Similarly, researchers have estimated that PFAS contamination is costing the European Union in health-related costs between [\\$59-\\$95 billion per year](#). Meanwhile, [recent testing](#) of textile products labeled as being stain- or water-resistant found that 72% were found to contain PFAS chemicals.

The Bluesign certification should be helping to prevent further PFAS contamination. Without changing its standards to address the entire class of PFAS, however, Bluesign will continue to be part of the problem rather than the solution. Companies can choose to stop using the small number of PFAS chemicals on the restricted substance list and simply move to a different set of PFAS chemicals instead, promoting the continued use of these highly toxic and persistent compounds. Meanwhile, consumers looking for PFAS-free products will not be able to trust the Bluesign label and government agencies won't be able to rely on the Bluesign certification to find products that meet PFAS-free specifications. Indeed, a recent study by Silent Spring Institute found similar PFAS concentrations in water- and/or stain-resistant products, whether or not they were green-certified. This underscores that green certifications are not adequately protecting the public from this harmful class of chemicals.

Last year the state of Maine passed legislation that bans non-essential uses of PFAS by 2030, and the European Union is also moving to take similar action. Multiple U.S. states have passed laws banning PFAS in a wide range of products including carpets, rugs, aftermarket textile treatments, food packaging, juvenile products, and firefighting foam, and are pursuing further bans. Under its Safer Products for Washington Act, the state of Washington is planning to restrict the use of PFAS in carpets, rugs, and home

furnishings, and will be stepping up its timelines to act on apparel and outdoor gear. [California](#) is also regulating PFAS in certain textile applications through its Safer Consumer Products program. Manufacturers are taking note and some leading textile, apparel and outdoor companies have taken action to eliminate the entire class of PFAS from their product lines. Consumers are also demanding action on PFAS. For example, more than [60,000 people](#) signed petitions and sent emails to the outdoor retailer REI asking for the company to stop selling products containing PFAS.

To remain relevant and achieve its stated aims of protecting human health and the environment, Bluesign must quickly update all of its certifications to prohibit the use of all PFAS compounds in both products and product manufacturing, and limit the level of permissible contamination.

We look forward to discussing this matter with you at your earliest convenience.

Sincerely,

Pam Miller
Alaska Communities Against Toxics

Rachael Wein
Center for Environmental Health

Bobbi Wilding
Clean and Healthy New York

Cynthia Luppi
Clean Water Action

Alexandra McNair
Fashion FFwd

Leah Segedie
Mammavation

Mike Schade
Mind the Store

Sujatha Bergen
Natural Resources Defense Council, Inc.

Sarah Doll
Safer States

Laurie Valeriano
Toxic-Free Future

Heather Trim
Zero Waste Washington



April 6, 2022

To: AFIRM

cc: NIKE, KONTOOR BRANDS, SMITH'S, AMAZON, CARHARTT, CROCS, GAP INC., J. CREW, KROGER, LEVI STRAUSS & CO., NEW BALANCE, NORDSTROM, PVH, SKECHERS, THE CHILDREN'S PLACE, THINX INC., UNDER ARMOUR, VF CORPORATION, VICTORIA'S SECRET & CO

Dear AFIRM:

Your textile standards are failing to address the major health and environmental threats posed by per-and polyfluoroalkyl substances (PFAS). Known as “forever chemicals” because they don’t break down in the environment, PFAS have been linked to a wide range of [serious health problems](#) including cancer, hormone disruption, immune suppression and reproductive problems.

Currently, the AFIRM standards only address a small handful of the [12,000+ PFAS chemicals](#) that have been identified. Yet scientists from around the world are [calling on governments](#) to eliminate the [entire class of PFAS](#) due to their toxicity and extreme persistence. Earlier this year, a [UN Human Rights Commission report](#) also urged countries to ban all uses of PFAS. The AFIRM certification is designed to give consumers confidence in what they are buying. Therefore, it is important that you hold your membership to the highest possible standards and reflect the growing consensus that the entire class of PFAS must be phased out.

As such, AFIRM should require its clients to stop adding PFAS to their products and eliminate PFAS use during all phases of the manufacturing processes in order to obtain

certification. To address contamination issues, AFIRM should also require its clients to test for the presence of total fluorine or organic fluorine at the lowest level that is technically achievable through validated methodologies. For example, some labs are currently able to test for total organic fluorine at a detection level of 300 ppb. Importantly, AFIRM must update *all* of its certifications to address the entire class of PFAS chemicals. Revising a certification only for children's products or for "gold" levels of certification, for example, will not be sufficient to address the threat of PFAS.

Nearly every American has [PFAS in their body](#). PFAS are found in [blood](#), [breast milk](#) and even the [umbilical cord blood](#) of newborn babies, and the detections of current-use PFAS compounds are [doubling in breast milk every four years](#). Scientists estimate that over [200 million Americans](#)—more than 60% of the country's population—are likely drinking water contaminated with PFAS. States and localities are spending [hundreds of millions of dollars on](#) cleaning up PFAS pollution in their communities and providing safe drinking water for their residents. Similarly, researchers have estimated that PFAS contamination is costing the European Union in health-related costs between [\\$59-\\$95 billion per year](#). Meanwhile, [recent testing](#) of textile products labeled as being stain- or water-resistant found that 72% were found to contain PFAS chemicals.

The AFIRM certification should be helping to prevent further PFAS contamination. Without changing its standards to address the entire class of PFAS, however, AFIRM will continue to be part of the problem rather than the solution. Companies can choose to stop using the small number of PFAS chemicals on the restricted substance list and simply move to a different set of PFAS chemicals instead, promoting the continued use of these highly toxic and persistent compounds. Meanwhile, consumers looking for PFAS-free products will not be able to trust the AFIRM label and government agencies won't be able to rely on the AFIRM certification to find products that meet PFAS-free specifications. Indeed, a recent study by Silent Spring Institute found similar PFAS concentrations in water- and/or stain-resistant products, whether or not they were green-certified. This underscores that green certifications are not adequately protecting the public from this harmful class of chemicals.

Last year the state of Maine passed legislation that bans non-essential uses of PFAS by 2030, and the European Union is also moving to take similar action. Multiple U.S. states have passed laws banning PFAS in a wide range of products including carpets, rugs, aftermarket textile treatments, food packaging, juvenile products, and firefighting foam, and are pursuing further bans. Under its Safer Products for Washington Act, the state of Washington is planning to restrict the use of PFAS in carpets, rugs, and home furnishings, and will be stepping up its timelines to act on apparel and outdoor gear. [California](#) is also regulating PFAS in certain textile applications through its Safer

Consumer Products program. Manufacturers are taking note and some leading textile, apparel and outdoor companies have taken action to eliminate the entire class of PFAS from their product lines. Consumers are also demanding action on PFAS. For example, more than [60,000 people](#) signed petitions and sent emails to the outdoor retailer REI asking for the company to stop selling products containing PFAS.

To remain relevant and achieve its stated aims of protecting human health and the environment, AFIRM must quickly update all of its certifications to prohibit the use of all PFAS compounds in both products and product manufacturing, and limit the level of permissible contamination.

We look forward to discussing this matter with you at your earliest convenience.

Sincerely,

Pam Miller
Alaska Communities Against Toxics

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Breast Cancer Prevention Partners

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Center for Environmental Health

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Clean and Healthy New York

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Sujatha Bergen
Natural Resources Defense Council

Sarah Doll
Safer States

Laurie Valeriano
Toxic-Free Future

Heather Trim
Zero Waste Washington



April 6, 2022

To: OEKO-TEX

cc: Ralph Lauren, Levi Strauss & Co, Target, Hannah Andersson, Manduka, Carter's, Alaska Airlines, American Airlines, Boll & Branch, Bearaby, Caro Home, Mosobam LLC, Revival New York Corp., WestPoint Home LLC

Dear OEKO-TEX:

Your textile standards are failing to address the major health and environmental threats posed by per-and polyfluoroalkyl substances (PFAS). Known as “forever chemicals” because they don't break down in the environment, PFAS have been linked to a wide range of [serious health problems](#) including cancer, hormone disruption, immune suppression and reproductive problems.

Currently, the OEKO-TEX standards only address a small handful of the [12,000+ PFAS chemicals](#) that have been identified. Yet scientists from around the world are [calling on governments](#) to eliminate the [entire class of PFAS](#) due to their toxicity and extreme persistence. Earlier this year, a [UN Human Rights Commission report](#) also urged countries to ban all uses of PFAS. The OEKO-TEX certification is designed to give consumers confidence in what they are buying. Therefore, it is important that you hold your membership to the highest possible standards and reflect the growing consensus that the entire class of PFAS must be phased out.

As such, OEKO-TEX should require its clients to stop adding PFAS to their products and eliminate PFAS use during all phases of the manufacturing processes in order to

obtain certification. To address contamination issues, OEKO-TEX should also require its clients to test for the presence of total fluorine or organic fluorine at the lowest level that is technically achievable through validated methodologies. For example, some labs are currently able to test for total organic fluorine at a detection level of 300 ppb. Importantly, OEKO-TEX must update *all* of its certifications to address the entire class of PFAS chemicals. Revising a certification only for children's products or for "gold" levels of certification, for example, will not be sufficient to address the threat of PFAS.

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The OEKO-TEX certification should be helping to prevent further PFAS contamination. Without changing its standards to address the entire class of PFAS, however, OEKO-TEX will continue to be part of the problem rather than the solution. Companies can choose to stop using the small number of PFAS chemicals on the restricted substance list and simply move to a different set of PFAS chemicals instead, promoting the continued use of these highly toxic and persistent compounds. Meanwhile, consumers looking for PFAS-free products will not be able to trust the OEKO-TEX label and government agencies won't be able to rely on the OEKO-TEX certification to find products that meet PFAS-free specifications. Indeed, a recent study by Silent Spring Institute found similar PFAS concentrations in water- and/or stain-resistant products, whether or not they were green-certified. This underscores that green certifications are not adequately protecting the public from this harmful class of chemicals.

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Safer States

Laurie Valeriano
Toxic-Free Future

Heather Trim
Zero Waste Washington



April 6, 2022

To: ZDHC

cc: NIKE, GAP INC., LEVI STRAUSS & CO., NEW BALANCE, NORDSTROM, VICTORIA'S SECRET & CO, JC PENNEY

Dear ZDHC:

Your textile standards are failing to address the major health and environmental threats posed by per-and polyfluoroalkyl substances (PFAS). Known as “forever chemicals” because they don’t break down in the environment, PFAS have been linked to a wide range of [serious health problems](#) including cancer, hormone disruption, immune suppression and reproductive problems.

Currently, the ZDHC standards only address a small handful of the [12,000+ PFAS chemicals](#) that have been identified. Yet scientists from around the world are [calling on governments](#) to eliminate the [entire class of PFAS](#) due to their toxicity and extreme persistence. Earlier this year, a [UN Human Rights Commission report](#) also urged countries to ban all uses of PFAS. The ZDHC certification is designed to give consumers confidence in what they are buying. Therefore, it is important that you hold your membership to the highest possible standards and reflect the growing consensus that the entire class of PFAS must be phased out.

As such, ZDHC should require its clients to stop adding PFAS to their products and eliminate PFAS use during all phases of the manufacturing processes in order to obtain certification. To address contamination issues, ZDHC should also require its clients to

test for the presence of total fluorine or organic fluorine at the lowest level that is technically achievable through validated methodologies. For example, some labs are currently able to test for total organic fluorine at a detection level of 300 ppb. Importantly, ZDHC must update *all* of its certifications to address the entire class of PFAS chemicals. Revising a certification only for children's products or for "gold" levels of certification, for example, will not be sufficient to address the threat of PFAS.

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