



SF Environment

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A Department of the City and County of San Francisco

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Mayor

Deborah O. Raphael
Director

January 21, 2022

Ms. Brittney Maule
Manager, Science and Standards
Green Seal
1717 K St NW, Suite 900
Washington, DC 20006
Via email at standards@greenseal.org

RE: Proposed Revision to Prohibit PFAS in Cleaning and Personal Care Products

Dear Ms. Maule,

We appreciate the opportunity to comment on the Proposed Revision to Prohibit PFAS in Cleaning and Personal Care Products. As you may know, the City and County of San Francisco has been working steadily to eliminate purchases of products containing PFAS. We have long pointed to Green Seal certified products in our contract specifications, and were dismayed to recently discover that a Green Seal certified product may be the source of PFAS contamination of wastewater at a San Francisco facility. **We therefore strongly concur with a full prohibition of PFAS in cleaning and personal care products.**

Furthermore, we believe that Green Seal must go farther, faster. The PFAS-containing product noted above is a floor care product, one of the product categories Green Seal plans to address in a later phase. Given that inaction today only compounds the long future of PFAS pollution that we all collectively face, **we urge Green Seal to commit now to prohibiting PFAS in all products, with limits on personal care products and cosmetics effective immediately upon adoption, and after one year for all other product categories.** Such an action would send a clear signal to the market that PFAS does not belong in any “green” product, and must be eliminated.

In addition, we offer the below comments for all Green Seal product categories.

1. **PFAS Limit:** The proposal does not clearly specify a level to which PFAS is limited, but points to the Green Seal hand sanitizer criteria with a limit of “0.01% by weight.” We suggest you clarify what this limit is for. We assume it is for total fluorine, but that is not clear. If so, it is our understanding that a lower limit -- 10ppm -- is now achievable in quality commercial laboratories. We urge you to adopt 10ppm total fluorine as the PFAS limit for all product categories, whether intentionally added or present as a contaminant.
2. **Test Method:** We urge Green Seal to specify an approved test method in its criteria. We suggest a total fluorine test using combustion ion chromatography or similar method that is available broadly in commercial laboratories. Total fluorine testing is a reasonable proxy for the presence of PFAS and is relatively inexpensive. Should a product test above 10ppm for total fluorine, it could be

followed by total organic fluorine testing to discern whether the fluorine present is organic or inorganic. At that point, any product with test results above 10ppm organic fluorine would not be eligible for certification.

3. **Compliance Verification:** The strongest certification programs verify product claims; to that end, we urge Green Seal to include in the criteria the methods by which verification will be conducted. We suggest that a manufacturer must either submit products for testing or provide accredited laboratory results verifying claims. Furthermore, given the potential for accidental PFAS introduction into supply chains, we urge Green Seal to conduct random product testing and include language in the standard regarding this and the consequences (i.e. loss of certification) should product testing reveal the presence of prohibited substances. Lastly, we recommend that the revision include language that verification must be repeated upon each recertification.

Thank you for your consideration of these comments. We welcome the opportunity to discuss them and any questions or concerns you may have.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Jen Jackson', with a long horizontal flourish extending to the right.

Jen Jackson
Toxics Reduction & Healthy Ecosystems Program Manager