



Eric Artz, President & CEO
REI Co-Op
1700 45th St E,
Sumner, WA 98352

September 8, 2021

Re: Phase out and ban PFAS in outdoor apparel and all products at REI

Dear Mr. Artz:

We appreciate REI's work to improve the chemical safety of its products and packaging.

We are writing today to urge REI to build on these efforts and phase out and ban all PFAS (per- and polyfluoroalkyl substances) in all products and packaging sold at REI, including owned brand and brand-name outdoor apparel and other products.

Chemical companies market PFAS chemicals for their stain-resistant, water-repellent, and grease-proof properties, and they are used in many products such as outdoor apparel. A growing body of scientific research has found links between exposures to PFAS and a wide range of health problems including a weaker immune system, cancer, increased cholesterol levels, pregnancy-induced hypertension, liver damage, reduced fertility, and increased risk of thyroid disease. Scientists are most concerned about the cumulative impact resulting from exposures to products, contaminated drinking water, and contaminated food.

According to the EPA PFAS action plan: *"textiles and apparel account for approximately 50 percent of the volume of fluorotelomers...apparel makes up about 10 percent of total fluoropolymer use, based on total reported production volume."*

Studies have found PFAS can migrate out of textiles, undoubtedly exposing REI employees and customers to harmful chemicals. Volatile PFAS can be emitted into indoor air and expose consumers, children, and workers, and researchers have measured emissions specifically from outdoor apparel. Based on testing of various indoor environments including offices, outdoor retailers, and carpet retailers, researchers have concluded that textiles are likely the dominant indoor source of these compounds. They found: *"The highest concentrations in air were identified in shops selling outdoor clothing, indicating outdoor textiles to be a relevant source of FTOH in indoor workplace environments."*

PFAS pollution has impacted people, fish, and wildlife, including dolphins and whales, as well as some of the most precious places on the planet such as the Arctic. A 2021 study found PFAS in the snow and meltwater at Mount Everest. The use of PFAS in outdoor apparel and other products contributes to the contamination of the entire planet with chemicals that literally can last forever. This is in direct conflict with REI's commitment to sustainability and environmental protection. The company states: *"As a co-op, we put purpose before profits and act in the long-term interests of our members and community...Recognizing that the gear the co-op makes and sells is one of its greatest opportunities to support better ways of doing business."*

A recent peer-reviewed study co-authored by scientists at Toxic-Free Future, Indiana University, the University of Washington, and Seattle Children's Research Institute found PFAS in 100% of breast milk samples tested and showed that newer PFAS build up in people. All of these samples were collected from women in Washington state, the headquarters of REI. The detections of PFAS that are currently used in products like outdoor gear are doubling in breastmilk every four years. This should be a wake-up call for companies and governments to take immediate action.

In addition to contamination, the production of PFAS also contributes to the climate crisis. Chemical companies like Chemours and Daikin that manufacture PFAS use and release significant quantities of the potent greenhouse gas and ozone-depleting chemical, HCFC-22. This pollutant damages Earth's atmosphere in two ways. First, HCFC-22 depletes the atmospheric ozone layer, which protects against harmful solar radiation that may cause skin cancer and cataracts. Second, it is a potent greenhouse gas—its global warming potential is estimated at 5,280 times that of carbon dioxide.

Washington state has been a leader on PFAS since 2018. It was the first state in the nation to ban the entire class of more than 9,000 PFAS in certain food packaging and firefighting foam. It is also currently considering bans under the groundbreaking Safer Products for Washington law for certain textiles and we expect outdoor apparel to be addressed in the near future.

Other states where REI has retail locations are also taking regulatory action as the costs of PFAS cleanup skyrocket into the billions. For example, following Washington state's lead, laws have been adopted by CA, CO, CT, IL, ME, MN, NH, NY, and VT to ban PFAS in key product categories such as carpets, rugs, aftermarket treatments, ski wax, firefighting foam, and food packaging. Maine has a law to phase out all PFAS in products by 2030 unless the state environmental agency deems PFAS: *"essential for health, safety or the functioning of society and for which alternatives are not reasonably available."* Federal legislation to protect communities and ban PFAS in multiple product sectors has been or is expected to be reintroduced in the coming months. As toxic chemical policies continue to gain traction in more states and at the federal level, REI must act.

Relying on the chemical industry and product manufacturers to self-police will not satisfy the concerns of millions of consumers who are voting with their dollars and demanding greater transparency, safer products, and justice for Black people, Indigenous people, and other people of color who are disproportionately impacted by toxic pollution. With the high costs and increased regulatory scrutiny on the entire PFAS class, REI may face substantial financial and regulatory risks by continuing to allow them in products. REI's reputation and customer loyalty could also be jeopardized, particularly given its members' strong interest in sustainability.

REI can mitigate these growing risks and get ahead of the curve by expanding its chemicals policy to comprehensively address PFAS. Retailers are increasingly adopting safer chemicals policies to eliminate PFAS in key product sectors, according to our annual [Retailer Report Card](#). For example, Lowe's and Home Depot are no longer selling indoor residential carpets or rugs with PFAS, and Lowe's also committed to stop selling fabric protection sprays with PFAS. In addition, [18 retailers selling food or food packaging](#) have announced steps to reduce or eliminate PFAS in food packaging at their more than 77,000 stores. And many outdoor and textiles brands have announced policies to reduce and eliminate PFAS. Last month, Polartec announced it was eliminating PFAS in its DWR (durable water repellent) treatments across its line of performance fabrics.

In contrast, we are very concerned that REI's policy and actions on PFAS are inadequate given the urgency and scope of the PFAS crisis. It is commendable that REI set a requirement in 2020 that all ski wax products and gear and clothing treatments supplied to REI be free of long-chain and short-chain PFAS by spring 2023. But there are many other products being sold at REI such as jackets, footwear, tents, and sleeping bags that most

likely continue to contain PFAS that contribute to global contamination of communities, wildlife, breastmilk, and drinking water.

The time is now for REI to lead the outdoor apparel industry in an aggressive transition away from PFAS. As one of the largest retailers in the outdoor industry and a business renowned for its commitment to sustainability, REI has a responsibility to lead this transition. We recommend REI take the following steps:

1. **Policy:** Adopt and publish a bold policy to phase out and ban the entire PFAS class in all brand-name and private-label products REI sells, especially outdoor apparel. This policy should have senior management-level engagement and accountability for suppliers (e.g. third-party testing and disclosure) and measure and publicly report on continuous improvement toward reducing, eliminating, and safely substituting PFAS.
2. **Goals and metrics:** Set clear, ambitious public goals with timelines and quantifiable metrics to measure success in eliminating PFAS in all products and packaging.
3. **Avoid regrettable substitution:** Invest in assessing the safety of alternatives to PFAS using tools like [GreenScreen](#), [ChemFORWARD](#), and [Scivera](#) to ensure informed substitution so that suppliers do not move to other harmful replacement chemicals.
4. **Transparency:** Embrace “radical transparency” to meet rising consumer demand for the full public disclosure of alternatives used to replace PFAS. Your members have a fundamental right to know.
5. **Stay ahead of and support government regulation:** REI should also support state and federal policy reform to advance solutions to PFAS.

REI has the market power and the responsibility to lead the outdoor apparel industry to drive the adoption of innovative sustainable solutions and help meet the rising consumer demand for safer, healthier, and more sustainable products.

We would welcome the opportunity to meet with you to discuss our concerns and these recommendations. To schedule a meeting, contact mikeschade@saferchemicals.org. Thank you.

Sincerely,



Mike Schade, Campaign Director
Mind the Store campaign



Laurie Valeriano, Executive Director
Toxic-Free Future



Liz Hitchcock, Director
Safer Chemicals Healthy Families



Sarah Doll, Director
Safer States

CC: Kate Wendt, Vice President of Strategy, Planning & Sustainability