

September 2, 2025

Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333

Submitted electronically to rulecomments.dep@maine.gov

Re: Chapter 90: Products Containing Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)

The Personal Care Products Council (PCPC)¹ respectfully submits the following comments to the Maine Department of Environmental Protection (DEP) regarding the initiated rulemaking proposal to amend Chapter 90 to establish Currently Unavoidable Use (CUU) designations for products containing intentionally added PFAS.

PCPC and its member companies have long been supportive of commonsense laws and policies that protect both the consumer and the environment, including PFAS restriction. We have been proud to support laws and policies to prohibit certain intentionally added PFAS from use in cosmetics and will continue to do so.

We appreciate that the recent staff memo recommends approval for Current Unavoidable Use (CUU) proposal HQC-J9ZH-K4EZJ for container vented cap liners "across multiple product categories (cleaning products and cosmetic products)." These liners are critical to product safety and thus necessary for the safety of consumers. We appreciate this recommendation and ask that the final rule be amended to clearly reflect this application to both the cleaning and cosmetic product categories, as the rule language only mentions cleaning products.

Thank you for this opportunity to weigh in on this important topic. We look forward to continuing to work with you on this and other regulatory issues moving forward.

Sincerely,



Emily Manoso
EVP, Legal & Regulatory Affairs and General Counsel
Personal Care Products Council