

Margerum, Mark T

From: Kate Lewis <Kate.Lewis@ethanallen.com>
Sent: Wednesday, July 13, 2022 9:55 AM
To: Malinowski, Kerri
Cc: Eric Koster; Rebecca Ely
Subject: Ethan Allen Global Inc. - Comments

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Kerri:

My name is Kate Lewis, and I am the Director of Compliance for Ethan Allen Global Inc. This email is in response to your request for written comments for the Concept Draft for Maine PFAS in products Program. Ethan Allen General Counsel, Eric Koster assisted in this response.

Ethan Allen Global, Inc. and its subsidiaries, including Ethan Allen Operations, Inc. (collectively, “Ethan Allen”) manufactures and sells furniture and home furnishings throughout the United States and internationally. Many of its products – including, as relevant here upholstered items – are custom made utilizing myriad frames, dozens of cushion varieties, upholstery styles, and finish options, but which are upholstered with a finite number of fabrics. As a result, very few, if any, items are identical – and each custom item is designated by a separate item number (known as an SKU). The common denominator among upholstered items is the fabric.

As we understand the proposed Maine reporting requirements for fabric that may be treated with PFAS stain repellent, Ethan Allen will be required to report PFAS content on each item sold in the state. Due to the virtually unlimited combinations of materials in its custom-made furniture, we believe that the proposed reporting requirement would be overly burdensome if Ethan Allen were compelled to file a report on each variation. Moreover, the volume of reports would also overburden your agency’s ability to monitor the PFAS content on fabric.

Accordingly, we suggest respectfully, that it would be in the best interests of both Ethan Allen and the State of Maine, to limit Ethan Allen’s reporting obligations on a per fabric basis rather than on a per item basis. By doing so, all upholstered items sold in Maine will be reported based upon the upholstery fabric rather than by non-PFAS criteria such as wooden frames that may be covered in many different fabrics.

Please feel free to contact me at your convenience. Thank you.

KATE
LEWIS
DIRECTOR OF COMPLIANCE

Ethan Allen Global, Inc and its subsidiaries
25 Lake Avenue Ext | PO Box 1966
Danbury, CT 06813-1966
203.743.8698 fax 203.743.8536

kate.lewis@ethanallen.com

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