**IC2 Product Testing Workgroup Meeting Notes | October 28th, 2026 at 3pm ET/ 12pm PT**
**Participants (20):** Mikalah Bailey, Andre Algazi, Michele McCaughey, Michael Zahn, Amy Gilson, Amanda Charette, Sarah Briggs, Jennifer Harfmann, Conor Shea, Victoria Klipp, Ivan Titaley, Pierce Rigrod, Kelleigh Wasser, Andrea Allen, Sara Sekerak, Karna Holquist, Brenna Giannetti, Amy Salamone, Stephanie Frisch, Kaitlyn Gruber

**Roundtable: Program Updates & Upcoming Legislation**

- California DTSC
    - Conducting formaldehyde testing in personal care products using an in-house LC-MS method focused on free formaldehyde.
    - The work is intended to better understand formaldehyde levels associated with formaldehyde-releasing preservatives.
- New York DEC
    - Preparing for implementation of the state's PFAS carpet restrictions.
    - Shared recent product testing findings, including lead in children's jewelry, flame retardants in electronic displays, and PFAS detections in apparel and food packaging.
    - Continued enforcement efforts have resulted in noncompliant products being removed from online marketplaces.
- Minnesota PCA
    - Continuing testing of food packaging and evaluating fluorine concentration thresholds that may indicate intentional PFAS use.
    - Ongoing testing projects include cookware, menstrual products, waterproofing treatments, dental floss, diapers, wipes, patio furniture covers, juvenile products, and curtains.

**Discussion Topic: PFAS Analytical Methods & Compliance Screening Approaches**

- New York DEC
    - Testing products including carpets, food packaging, apparel, children's jewelry, and electronic displays.
    - Using testing primarily for compliance assessment, enforcement, and market surveillance activities.
    - Discussed challenges associated with enforcing content-based PFAS restrictions, particularly distinguishing intentional PFAS use from incidental or background contamination.

    - Noted the importance of analytical approaches that provide defensible data for enforcement actions and compliance determinations.
    - Highlighted the need for clear compliance thresholds as additional PFAS restrictions take effect.
- Minnesota PCA
    - Testing food packaging, cookware, menstrual products, dental floss, waterproofing treatments, patio furniture covers, diapers, wipes, juvenile products, and curtains.
    - Using testing to support implementation of PFAS legislation, identify products of concern, conduct market surveillance, and prioritize future regulatory efforts.
    - Discussed the use of fluorine screening methods to help identify products that may warrant more detailed PFAS analysis.
    - Emphasized balancing laboratory resources and testing costs while still obtaining meaningful compliance information.
    - Noted ongoing efforts to better understand what fluorine concentrations may indicate intentional PFAS use.
- Washington Dept of Ecology
    - Testing artificial turf systems, including turf fibers, backing materials, infill, and shock pads.
    - Using testing to support the Safer Products Program, alternatives assessments, and future regulatory determinations.
    - Discussed combining targeted PFAS analyses with fluorine screening approaches when evaluating complex products.
    - Highlighted the value of testing data in identifying safer alternatives and informing future restrictions.

**Analytical Methods & Common Challenges Discussed Across States**

- Analytical approaches discussed included:
    - Combustion Ion Chromatography (CIC) for total fluorine screening.
    - LC-MS/MS and other targeted PFAS analytical methods.
    - Total Organic Fluorine (TOF) analysis.
    - Extractable Organic Fluorine (EOF) analysis.
    - Specialized methods for textiles and fluorinated polymer-containing products.
- Common challenges identified:
    - Determining whether fluorine detections indicate intentional PFAS use.

    - Establishing scientifically and legally defensible compliance thresholds.
    - Addressing product categories that lack standardized testing methods, particularly apparel and textiles.
    - Accounting for fluoropolymers and PFAS compounds that may not be captured through targeted analyses.
    - Managing laboratory capacity, sample preparation requirements, and testing costs.
    - Interpreting results from products containing multiple materials and components.

**Key Takeaway**

- States are using a range of screening and targeted analytical approaches depending on whether the goal is research, market surveillance, compliance assessment, enforcement, or regulatory development.

**Future Meeting Topics (Interest Ranking)**

1. Playground surfacing materials (PFAS, PAHs, and lead)
2. Menstrual product testing
3. Organohalogen flame retardants in electronics

**December Meeting Rescheduling**

- The next workgroup meeting is now scheduled for December 16.

**Chat Resources:**

- Draft Technical Supporting Documentation for Regulatory Determinations for Cycle 2, Phase 3.
- Cycle 2 Draft Regulatory Determinations Webinar - Washington State Department of Ecology
- Hard surface sealer study: Fluorine mass balance in commercial stone sealers from the US market and evaluation of PFAS-free al…
- Regarding EN 17681-1:2025:New EN 17681-1:2025 PFAS Testing Standard for Textiles
- EU - Update on Targeted PFAS Analysis EN 17681-1:2025
- Updated PFAS Test Method for Textile Products | SGS USA
- EN 17681-1:2025 - PFAS Analysis in Textiles by LC-MS/MS Method

- Original hydrolysis paper: https://www.sciencedirect.com/science/article/pii/S0045653521005130 (open access)