AUTO CARE ASSOCIATION | STATE PFAS COMPLIANCE SERIES

Washington PFAS Compliance

Safer Products for Washington: RCW 70A.350 and Ch. 173-337 WAC.
Automotive washes restricted January 1, 2027; automotive wax reports due January 31, 2027



WHAT IS PFAS?

Per- and polyfluoroalkyl substances (PFAS) are a class of fluorinated chemicals. Washington restricts or requires reporting of **intentionally added** PFAS in specific product categories. For most newer categories, including automotive washes and waxes, the Department of Ecology presumes PFAS were intentionally added if total fluorine is above 50 ppm. A manufacturer can rebut that with a statement and credible evidence.

WHO MUST COMPLY

Restrictions apply to anyone who manufactures, sells, or distributes a restricted product in Washington, including direct-to-consumer online sellers shipping into the state. Reports come from one reporting party per product: the company that had it made, then the brand owner, then the first U.S. importer or distributor.

KEY DATES AND RESTRICTIONS

Date	What happens
Jan 1, 2025	Restricted: aftermarket stain and water-resistance treatments for textiles and leather; carpets and rugs
Jan 1, 2026	Restricted: indoor leather and textile furniture and furnishings. Reporting coverage begins for automotive waxes and eight other categories
Jan 1, 2027	Restricted: automotive washes, cleaning products, apparel and accessories, for products manufactured on or after this date
Jan 31, 2027	First reports due for automotive waxes, floor waxes and polishes, hard surface sealers, cookware, footwear, and other reporting categories; annually after

WHAT TO REPORT

Reporting categories are not restricted. The reporting party files a notice in the Interstate Chemicals Clearinghouse High Priority Chemicals Data System (HPCDS) by Jan 31 each year:

- Chemical name and CAS number for each PFAS
- Product category at the GS1 product classification brick level
- Product component containing the PFAS, and its function
- Concentration range, reported at the highest concentration if there are several
- Reporting party contact information

Specific formulations are not required. Resubmit unchanged data each year.

AUTOMOTIVE AFTERMARKET PRODUCTS IN SCOPE

- **Automotive washes, restricted Jan 1, 2027:** products that clean vehicle exteriors, including body, windshield, mirrors, lights, and grills, on cars, trucks, buses, motorcycles, RVs, boats, and emergency vehicles. Excludes waxes, all-in-one wash and wax products, engine cleaners, and PFAS used as a propellant.
- **Automotive waxes, reporting:** products that protect and enhance vehicle exteriors, including all-in-one wash and wax products. First report due Jan 31, 2027.
- **Cleaning products, restricted Jan 1, 2027:** automotive washes are regulated separately, not as cleaning products.
- **Stain and water-resistance treatments, restricted since Jan 1, 2025:** aftermarket fabric, upholstery, and leather protectants may fall in this category; confirm against the definitions.

EXEMPTIONS

Exemptions (Ch. 173-337 WAC)

- Products manufactured before a restriction's effective date
- Previously owned products, unless the seller knows the product violates a restriction
- Products stored or transported in Washington solely for sale outside the state
- Category-specific exclusions, such as washes and waxes applied during vehicle manufacturing

Exemption requests and penalties

- **Exemption request:** a manufacturer can ask Ecology for an exemption, for example where the chemical is necessary and has no alternative. The applicant is temporarily exempt while Ecology decides.
- **Penalties:** up to $5,000 for a first violation and up to $10,000 for each repeat violation.

HOW TO COMPLY

Manufacturers and reporting parties

- Confirm which washes, waxes, and protectants contain intentionally added PFAS
- Reformulate automotive washes made on or after Jan 1, 2027
- Register in HPCDS and report automotive waxes by Jan 31, 2027
- Check test results against the 50 ppm total fluorine presumption

Distributors and importers

- If you are the first U.S. importer and no brand owner has a U.S. presence, you may be the reporting party
- Stop distributing restricted products made on or after each effective date
- Ask suppliers for manufacture dates and PFAS status

Retailers

- Stop selling restricted products made on or after each effective date, in stores and online
- Keep manufacture-date records for older stock
- Ask suppliers to confirm PFAS status

RESOURCES

RCW 70A.350 (statute) | Ch. 173-337 WAC (rule) | Ecology Safer Products for Washington | Compliance and reporting | HPCDS reporting system | Exemption guidance

Agency questions: SaferProductsWA@ecy.wa.gov | Association questions: govaffairs@autocare.org

Current as of October 21, 2026. For awareness only, not legal advice. Confirm obligations with the Washington Department of Ecology or your counsel.