



February 20, 2026

RE: SB0686 – OPPOSE AS DRAFTED (and proposed change)

Members of the Maryland Senate Education, Energy, and the Environment Committee:

The American Apparel and Footwear Association (AAFA) and National Council of Textile Organizations (NCTO) write regarding SB0686, legislation that would phase out products containing intentionally added per- and polyfluoroalkyl substances (PFAS) in Maryland, including very broadly defined “textiles.” NCTO and AAFA are not-for-profit trade associations established to represent the entire spectrum of the United States textile sector, from base fibers to finished sewn products, as well as supplier sectors that have a stake in the prosperity and survival of the U.S. textile and apparel manufacturers. U.S. textile and apparel producers are extremely diverse, technically advanced, and highly capital-intensive manufacturers involved in a multi-stage production chain. Our industry is a key American economic driver, employing nearly 500,000 workers nationwide. More information regarding our trade associations and the industry in general can be found on the [AAFA website](#) and the [NCTO website](#).

SB0686 would ban several products, including effective January 1, 2029, “textiles” which is currently defined as “an item made in whole or in part from a natural or synthetic fiber, yarn, or fabric, including leather, cotton, silk, jute, hemp, wool, viscose, nylon, or polyester. ‘Textile’ includes: (i) outerwear; and (ii) bedding.” For U.S. textile and apparel producers, this definition would cover some critical applications of personal protective equipment that, by January 1, 2029, will not have yet transitioned to suitable alternative materials.

Moreover, this definition, and the restrictions of textiles as a distinct category, will have very significant, presumably unintended, consequences for the broader economy. Numerous products are an “item made in whole or in part from synthetic fiber... or fabric.” In addition to apparel-like products, the definition would cover diverse end uses, such as:

- Filtration and separation media for emissions control and a wide range of industrial processes
- Medical textiles and components of medical devices
- Wire and cable applications
- Architectural and construction applications
- Components in lab equipment and supplies
- Parts for vehicles and aircraft
- Many additional machinery applications, including belts, wear surfaces, and release liners

Not only will this deny Marylanders of several critical products enjoyed and relied upon every day, but it will impact the ability of companies in Maryland to obtain materials and components to manufacture products within the state and sold elsewhere.

In 2022, following negotiations with stakeholders such as apparel companies and large environmental groups, California enacted [a law](#) that covers intentionally added PFAS in “textile articles.”

The California law defines “textile articles” as: “textile goods of a type customarily and ordinarily used in households and businesses, and include, but are not limited to, apparel, accessories, handbags, backpacks, draperies, shower curtains, furnishings, upholstery, beddings, towels, napkins, and tablecloths.” The law goes on to provide exemptions.

The law defines “apparel” as “(1) Clothing items intended for regular wear or formal occasions, including, but not limited to, undergarments, shirts, pants, skirts, dresses, overalls, bodysuits, costumes, vests, dancewear, suits, saris, scarves, tops, leggings, school uniforms, leisurewear, athletic wear, sports uniforms, everyday swimwear, formal wear, onesies, bibs, diapers, footwear, and everyday uniforms for workwear. Clothing items intended for regular wear or formal occasions does not include personal protective equipment or clothing items for exclusive use by the United States military. (2) Outdoor apparel. (3) Outdoor apparel for severe wet conditions.” Similar definitions of “textile articles” and relevant exemptions are also included in several other states , such as: [Colorado](#), [Connecticut](#), [New York](#), [Rhode Island](#) and [Vermont](#).

We respectfully request that SB0686 mirror the textile article and apparel definitions that were carefully negotiated and successfully implemented through California law and have been replicated in multiple other states. Such regulatory harmonization ensures a predictable and orderly outcome for apparel and textiles producers, manufacturers of medical and industrial products, and consumers, all while achieving the presumed desired outcome of ensuring consumer product safety for the State.

If you have any questions, please contact Chelsea Murtha (cmurtha@aafaglobal.org) or Auggie Tantillo (atantillo@ncto.org). We appreciate your consideration of our views.

Sincerely,

American Apparel & Footwear Association
National Council of Textile Associations