ASSOCIATION OF HOME APPLIANCE MANUFACTURERS

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TESTIMONY

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On Behalf of
The Association of Home Appliance Manufacturers

Before the Oregon Senate
Environment and Energy Committee

HEARING
SB: 526
Mandating Microfiber Filters in
New Clothes Washers

February 12, 2025

Chair Sollman, Vice Chair Brock Smith, and members of the Environment and Energy Committee, the Association of Home Appliance Manufacturers (AHAM) appreciates the opportunity to provide comment on SB 526, relating to the issue of microfiber filtration in washing machines. We understand the interest and need to address microfiber pollution; however, a filter on a clothes washer is not the solution for many reasons and as such, AHAM is strongly opposed to SB 526.

AHAM represents more than 160 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives.

The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly $200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than $50 billion.

In Oregon, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to Oregon is $1.5 billion, approximately 10,000 direct and indirect jobs, $160.4 million in state tax revenue, and more than $514 million in wages. The home appliance industry, through its products and innovation, is essential to consumer lifestyle, health, safety and convenience. Home appliances also are a success story in terms of energy efficiency and environmental protection.

Appliance manufacturers share the goal to reduce microfibers in the environment and are actively trying to find a solution to help reduce the release of microfibers, but no viable solution has been found. SB 526 would mandate, on or before January 1, 2030, that all washing machines sold as new in Oregon contain a microfiber filtration system. AHAM opposes this bill because this method of addressing the release of microfibers into the environment is technically impractical and will not address the problem.

France Unable to Implement and California Governor Vetoed Similar Measures

In 2023, California Governor Gavin Newsom vetoed legislation that would have required microfiber filtration in clothes washing machines. As that bill was being considered, the LA Times Editorial Board wrote on August 21, 2023 (Editorial: Your clothes are polluting the environment with microplastics. Can washing machines help?). They did not support the bill and wrote:

> *Filters for the wash get gummed up pretty quickly with hair, soap and fabric softener and would have to be emptied as often as every wash to avoid clogs that interrupt washing cycles. And they must be cleaned without using water, or that just moves the release of microfibers from one drain to the other, as well as increasing water usage.*
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> *Ideally, these problems will get ironed out in the next few years as France implements its new washing machine law. Ultimately, textile manufacturers and fast fashion companies, which are a significant source of synthetic clothing worldwide, should switch to natural*

fibers that don't generate microplastic waste to begin with. Until that happens, we're left trying to catch and keep microfibers out of the environment.

Meanwhile, on September 21, 2023, the European Commission announced that France has withdrawn its decree requiring microplastic filters on clothes washers. The office of the French Minister for Ecological Transition, Christophe Bechu, stated that the decree was notified by mistake and that the subject is **not yet mature**.

The European Commission Technical Regulation Information System (TRIS) shows this matter being "withdrawn." From a legal point of view, the French law will not be amended, but in the absence of a regulatory text, it is not applicable as it stands. Technical and engineering challenges have led to multiple implementation delays since the 2020 French law was enacted that would have required, by 2025, microfiber filters in clothes washers.

Similarly, SB 526 requires a specific design solution instead of legislating a broad policy goal and allowing the experts -- appliance engineers - to innovate to find the best design solution for the appliance, the consumer, and the environment. Lastly, this pre-determined design solution would significantly increase the cost of a clothes washer and could create a public health problem. In Europe, they have been evaluating how to develop a standardized test procedure to fairly evaluate the effectiveness of a product for the consumer. This is the first step to help innovative solutions develop across the industry.

Public Health Issues Not Addressed from Filter of Wastewater Needing to be Cleaned

The Center for Disease Control and Prevention (CDC) states within its guidelines that contaminated textiles and fabrics often contain high numbers of microorganisms from body substances, including blood, skin, stool, urine, vomitus, and other body tissues and fluids. This bill would require everyone who washes clothes to clean a filter potentially with any of these substances. See photo below of a typical filter from a load of laundry with hair and other possible sewage.

High Cost of Filter ($159-$300) + Ongoing Filter Replacement Costs ($500/year)

Microfiber filters could almost double the cost of a new clothes washer products, significantly impacting low and moderate income households. Additional costs include ongoing costs of replacing filters over the life of the washing machine and higher monthly utility bills due to increased energy and water use caused by the filter. In addition to product purchase price and

ongoing filter costs, each of these systems require adequate space, plumbing installation, consumer labor, regular maintenance to remove filtered residue, and access to electricity supply and additional energy consumption.

Examples of Filters on the Market:

- Filtrol retails for $159
- MicroPlastics LUV-R system retails for $190
- Gulp is expected to publicly retail in UK for £250 (or over $300)
- Some devices also require consumable replacement filters, which add ongoing costs for consumers up to $500/year ($10/filter each week)

Prevents Innovation with Prescribed Single Filter Solution

The bill should not design how washing machine engineers should solve a problem but what they should solve for. The bill limits engineers to only one solution -- a filter "with a mesh size of not greater than 100 micrometers." No innovative ideas beyond a physical filter are allowed.

Increase in Plastic on Planet

Based on NSF International testing of external, in-line filters, it could take 13 years to capture the same amount of plastic that is in the filter, which is longer than the average useful life of a clothes washer. It will take even longer to recover the additional plastic added to the planet from the many replacement plastic filters needed over the use of the product.

From a lifecycle standpoint, the least efficient way to address the environmental impact of synthetic textiles is through minimizing those impacts during the use of the clothes washer (catching them mid-stream). Addressing the problem through textile design or through wastewater management systems (at the beginning or end of the lifecycle stream) is more effective.

Increase Energy & Water Use and Cycle Time

The energy consumption of today's clothes washer has declined by 70%. Washers of average efficiency can save a household more than 5,000 gallons of water and more than $150 in utility costs compared to a 10-year-old washer. These efficiency gains could effectively be eviscerated by the requirements to add a filter. Energy and water use changes resulting from microfiber filtration are significant. Independent, third-party testing by NSF finds that microfiber filtration systems increase the quantity of water, time, and energy required to wash a load of clothes. In some cases, the increased water use and cycle time is as much as an additional cycle with the use of a filter. Any performance level that is required cannot increase energy or water use, which is preempted by federal law (Energy Policy and Conservation Act).

Not Every Laundry Area Has Space for a Filter or Accessible to All

Microfiber filter solutions that have been announced are not engineered for all types of products and home configurations and are not accessible to people of all abilities, including people who use wheelchairs. Laundry areas can be of many different designs and may not have space for a filter. Further, people who are in wheelchairs or a person with a disability may not be able to replace or reach a filter to clean it.

AHAM appreciates the opportunity to provide comment on SB 526. Appliance manufacturers have been researching and trying to develop solutions in this area. The first step is a standardized test procedure to fairly evaluate the effectiveness of a product across the industry for the consumer. For future reference, my contact information is (202) 202.872.5955 x327 or jcassady@aham.org.