

SIA

Snowsports
Industries
America



Snowsports
Industries
America

Current US Compliance Issues

Implications for Winter Outdoor Retailers

PFAS: Forever Chemicals

- Perfluoroalkyl and polyfluoroalkyl substances (PFAS) are a class of chemicals used to make coatings and products that resist heat, oil, stains, grease, and water. Exceptional water and stain repellency.
- PFAS are found in DWR (Durable Water Repellent, Ski wax, GoreTex® (ePTFE) and other waterproof coatings, water/ stain repellent treatments, manufacturing lubricants
- These chemicals don't break down, they stay in the human system forever and can cause a number of cancers, birth defects, etc.
- Currently PFAS is currently being regulated by individual states, but starting in July 2025, the US EPA is requiring manufacturers/importers to report their PFAS products from 2011-2022 as well.



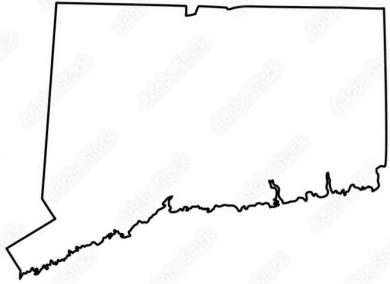
Happening Now! New York, California, Colorado

As of 1/1/25:

- NY (apparel) and California (textiles) Beginning on 1/1/25, it is prohibited to sell apparel and textiles containing PFAS after this date. Reminder that boots, poles, packs etc. can have textiles.
- **For New York and California apparel and textile products, retailers need to secure a certificate of compliance by 1/1/25 for all new shipments, certifying that your gear is PFAS free.**
- Colorado: Beginning on 1/1/25, “an extreme and extended use product that provides protection against extended exposure to extreme rain conditions or against extended immersion in water or wet conditions, such as snow conditions, in order to protect the health and safety of the user containing intentionally added PFAS chemicals” must be accompanied by a legible and easily discernible disclosure that includes the phrase “made with PFAS chemicals.”
- Ski wax containing PFAS is currently prohibited in VT and MN.



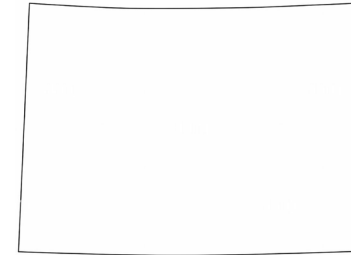
More On The Way



Connecticut
Apparel (2026)



Maine
Textiles(2026)
Ski wax (2026)



Colorado
Ski wax (2026)
Textiles (2028)



Rhode Island
Ski wax (2027)
Apparel (2027)



Washington
Ski wax (TBD)
Apparel (TBD)

Customer Communications: PFAS

- Given the product changes, consumers will have questions about performance and care.
- Vital to have clear messaging, become very educated on how brands want their PFAS-free products to be communicated to consumers, which might vary between brands
- Train store managers and shop floor staff to talk to customers
- Train them about PFAS free water proofing alternatives

PFAS Action Steps For Retailers

Ensure that the brands you carry:

- Provide Certificates of Compliance for all apparel/textiles and hardgoods/accessories with textiles
- Retailers should not be selling/shipping product that has PFAS into NY or CA

Ensure that you:

- Have Certificates of Compliance in hand ASAP
- Understand the urgency in NY and CA of segmenting inventory and not selling inventory with PFAS after 1/1/25
- Have clear messaging to discuss with customers
- Are stocked up on PFAS free waterproofing alternatives
- Remove all wax with PFAS from retail shelves and shops in VT & MN (and determine your level of risk regarding any factory applied wax that contains PFAS)

Canadian Regulations

Canada PFAS Reporting

- Canada's PFAS reporting requirement requires Canadian suppliers or importers to report on their use of PFAS during the 2023 calendar year. Reporting deadline: January 29, 2025

Canada Forced Labor Law

- As of January 1, 2024, companies that meet specific criteria must submit annual reports detailing their efforts to prevent forced labor and child labor in their supply chains.
- Entities that produce, sell, or distribute goods in Canada, import goods into Canada, or have significant assets in Canada must report. **Deadline: May 31 of each year.**



Extended Producer Responsibility / How It Works

- Producers must register with the Circular Action Alliance (PRO). Producers pay an annual fee to the PRO based on the types and amounts of packaging they report each year.
- Types of packaging: consumer-facing packaging materials and paper products.
- Includes packaging made of any material, regardless of recyclability, that is intended for single or short-term use and is used for the containment, protection, handling, or delivery of products to the consumer at the point of sale, including through an internet transaction.



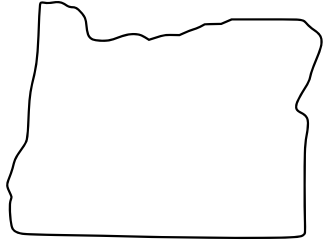
**Circular
Action
Alliance™**



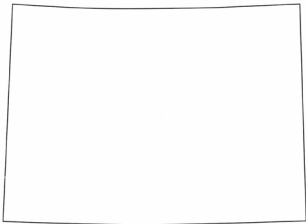
Who Qualifies

- **Producers:** product that is sold or distributed in the state using packaging materials under a manufacturer's own brand, or product that is sold or distributed using unbranded packaging materials. This can include the packaging used by a retailer to ship a product into one of the EPR states and/or if a retailer has their own packaging materials in-store.
- **Brand owners:** If the product is not manufactured by the brand owner, the producer is the person who licenses ("licensee") the brand or trademark under which a product is sold or distributed.
- **Licensees:** If a manufacturer or licensee is not located within the U.S., the producer is the person that imports the product.

Exemptions Vary by State: Read the Regulations!



- **Oregon:** Gross revenue of less than \$5 million sold, sells less than 1 metric ton of covered products into Oregon in the previous calendar year, nonprofit organization



- **Colorado:** Less than \$1 million in gross revenue per year or less than one ton of packaging and paper products sold in Colorado in the previous year.



- **California:** Sellers who only sell secondhand products are exempt. Businesses with less than \$1,000,000 in annual revenue are exempt.

Americans For Disability (ADA) Compliance

ADA compliance is the practice of making electronic information and technology accessible to people with disabilities.

Websites must remove barriers to information, making it accessible by people with various disabilities – this applies to both suppliers and retailers:

- Poor color contrast
- Use of color alone to give information
- Lack of text alternatives on images
- No captions on videos
- Inaccessible online forms
- Mouse-only navigation (lack of keyboard navigation)

Next steps:

- Update your website **asap**. Discuss with your web developer. If your website is managed by Shopify, you can download a plugin.

Coming Soon: EU Sustainability Regulations

Whether you are a US-based business selling in Europe or an EU-based company, many of the new EU sustainability regulations will impact your business.

Many of the reporting regulations will impact EU-based suppliers, but US subsidiaries and retailer will feel some impacts regarding new product designs, waste regulations, etc.

2025: Eco-design for Sustainable Products Regulation

- ESPR is part of a package of measures central to fostering the transition to a circular, sustainable, and competitive economy.
- New eco design requirements on various product groups including textiles, footwear and apparel – specific requirements will be determined in Q2 2025.



SUMMIT SERIES

DISCUSS THE LARGEST SNOWSPORTS MARKET
AT SUNDANCE

THE GLOBAL SUMMIT • MARCH 24-26, 2025

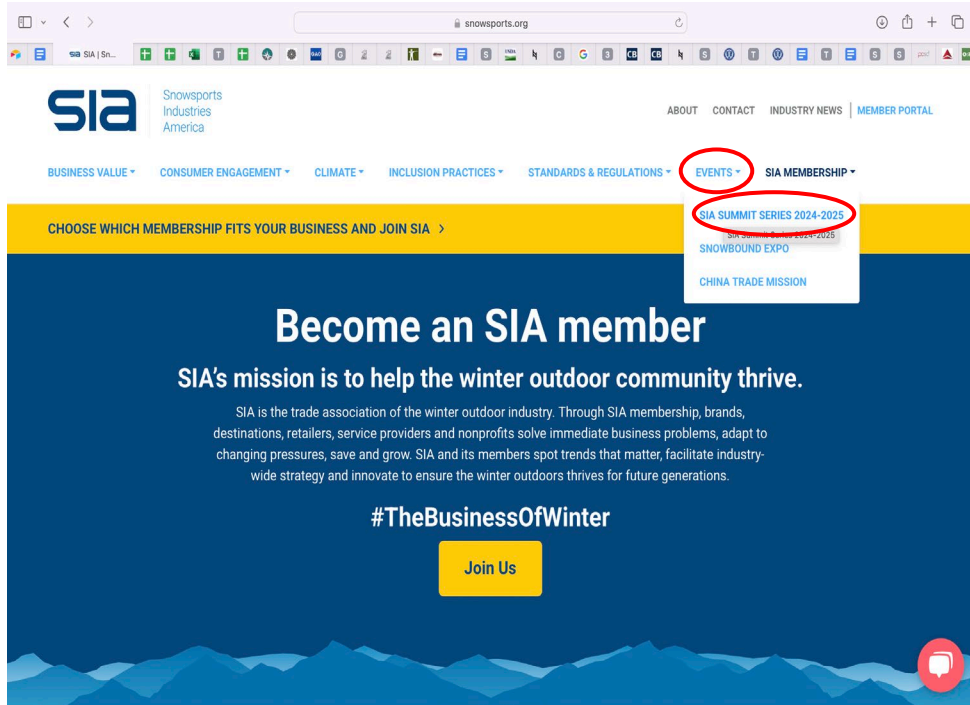
SUMMIT SERIES

GLOBAL SUMMIT AT SUNDANCE

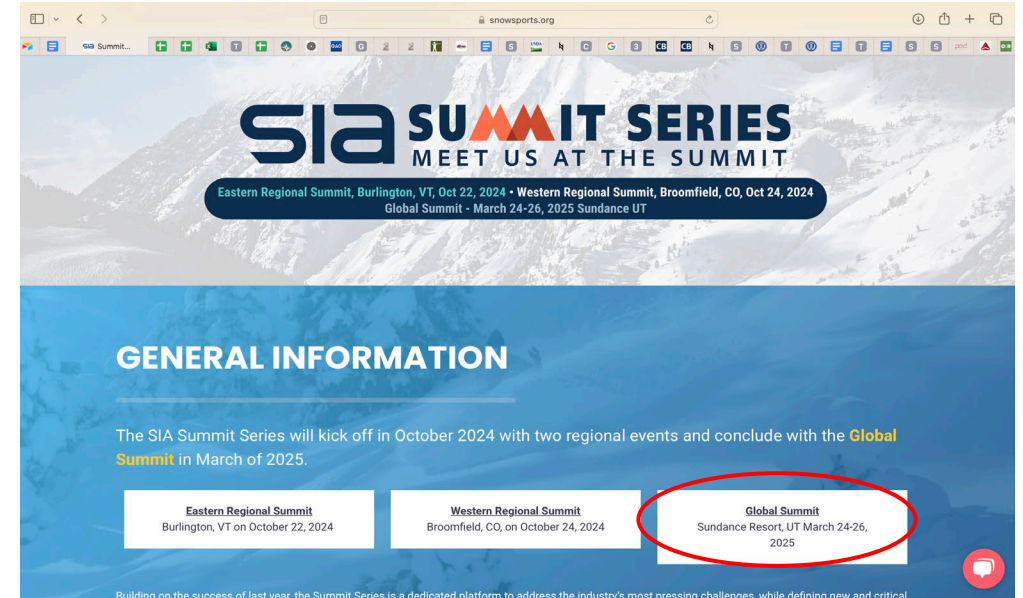
March 24-26, 2025 • Sundance, UT



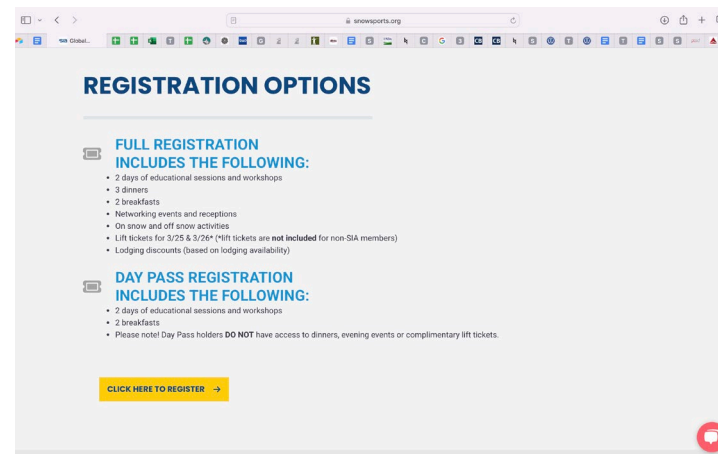
1. Go to www.snowsports.org and click on Events in upper right. On the drop down click Summit Series.



2. Click on Global Summit



2. And scroll down on the page to Registration



SIA

Snowsports
Industries
America