



VIA EMAIL

July 14, 2023

Governor Jay Inslee
Office of the Governor
P.O. Box 40002
Olympia, WA 98504-0002

Director Laura Watson
WA State Dept. of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Dear Governor Inslee and Director Watson:

We, the undersigned, strongly support the Department of Ecology's proposed priority chemicals for Cycle 2 of Safer Products for Washington, including: 6PPD; benzene, ethyl benzene, toluene and xylene substances (BTEX); brominated and/or chlorinated substances; cadmium and cadmium compounds; cyclic volatile methylsiloxanes; formaldehyde and formaldehyde releasers; and lead and lead compounds. This proposal represents a strong and important step towards ensuring products are safe for our communities and our environment.

Focusing on the proposed priority chemicals for regulatory action ensures that Washington is on a strong, science-based path toward protecting people and the environment from chemicals known to cause cancer, harm to brain development, and

other health effects. Taking swift action on these chemicals will help protect vulnerable populations and sensitive species like salmon and orcas. We cannot act too quickly to remove dangerous chemicals like lead and formaldehyde from products when companies can replace them with safer solutions.

The proposed priority chemicals are widely used in products. Importantly, some of them are being used as regrettable substitutes for other, better known chemicals of concern like PFAS. Their hazards are well-documented, including hormone disruption, reproductive harm, and cancer, with potentially far-reaching impacts to sensitive populations such as children and sensitive species such as salmon.

One additional chemical group we believe should be included as a priority in Cycle 2 is antimony and antimony compounds. Antimony is used as a catalyst to produce polyester and is found in plastics used for disposable beverage bottles. Antimony trioxide, used as a component in flame retardant applications, is classified as a carcinogen in the state of California. It has also been listed as a possible human carcinogen by the International Agency for Research on Cancer. Antimony is frequently reported as a component of children's products under the Children's Safe Products Act including in pacifiers, clothing, dolls, and many other products. With its widespread use and potential for harm to health, antimony should be among the chemicals listed as a priority for Cycle 2.

The law that created the Safer Products for Washington program includes a framework that is rational and results in decision-making that will prevent pollution and disease. It asks the right questions about whether dangerous chemicals are needed or can be replaced with safer solutions—avoiding expensive, error-prone assessments of how much risk from toxic exposures is acceptable.

Washington state has been a leader on prevention-based chemical policies, resulting in action by other states and companies phasing out the most dangerous chemicals. For example, following Washington state action on PFAS, eleven states enacted phase-outs of PFAS in food packaging and firefighting foam. Just recently, 3M announced it will end the manufacturing of all PFAS.

Putting in place strong regulations in Washington is essential to protect the health of people and wildlife. These actions will end the use of key classes of toxic chemicals in important product categories and drive the market to deliver safer solutions.

We urge you to swiftly move forward to finalize the proposed priority chemicals. If you have any questions, please contact Cheri Peele at cpeele@toxicfreefuture.org.

Sincerely,

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