



April 21, 2026

Casey Sixkiller
 Director
 Washington Department of Ecology
 P.O. Box 47600
 Olympia, WA 98504-7600

Re: Safer Products for Washington PVC/PVDC plastic packaging

Dear Director Sixkiller:

We, the undersigned, are writing regarding the agency's recent Safer Products for WA (SPW) [update](#), indicating a substantial delay of regulatory action on toxic plastics (PVC/PVDC). The agency would take up this product category again in Cycle 3 of SPW, resulting in a delay of at least five years.

Given the significant public health and environmental implications, we are deeply concerned about the consequences of postponing needed protections for five years or more. We urge the agency to reconsider its priorities and move forward without further delay.

There is growing concern about toxic chemicals and plastics and their impact on health and the environment, and a clear demand for more regulatory action.

- A recent [Pew poll](#) found that 82% of Washington residents believe the government should do more to identify and regulate harmful chemicals in everyday products, and 90% are concerned about chemicals in food packaging.

- Microplastics are a growing public concern and threat to health and environment. They are persistent, bioaccumulative, and toxic. Their toxicity is a dual problem: they present hazards not only as physical particles but also due to their complex chemical compositions. Due to the high hazard of PVC, microplastics are of even greater concern.

The agency has a clear opportunity to deliver results for the health and environment of Washingtonians. Instead, Ecology's recent update proposes delaying regulatory action on PVC/PVDC packaging for five years or more, citing internal coordination and continued evaluation of alternatives. These explanations are woefully inadequate to justify postponing protections for five years.

For the following reasons, the agency should move forward on track to ban PVC and PVDC packaging— high priority chemical class (organochlorine chemicals) and products identified under Safer Products for Washington:

- **PVC is among the most toxic plastics.** PVC (polyvinyl chloride) is a widely used plastic that is produced from the organochlorine chemicals chlorine gas, ethylene dichloride, and [vinyl chloride](#). The primary chemical that makes up PVC/PVDC plastic is highly hazardous vinyl chloride, a known human carcinogen associated with liver cancer, brain and lung cancers, and cancers of the blood. Vinyl chloride and toxic additives such as organotins, lead, and flame retardants can be present in the final PVC/PVDC packaging and leach out.
- **Significant amounts of PVC are used in packaging in Washington state.** [According to Ecology's own analysis](#), there are, "around 13,000 US tons of PVC used in packaging in Washington per year." When burned in incinerators or landfill fires, dioxins and furans, which are persistent and bioaccumulative toxic (PBT) chemicals, are emitted into the air or are concentrated in ash. Washington has one incinerator in Spokane and about 15 landfills.
- **There are safer alternatives to PVC and PVDC in packaging, and some packaging is entirely unnecessary.** Numerous companies have phased out or are in the process of phasing out PVC in packaging, including Costco, HP, Dell, Microsoft, Johnson & Johnson, Walmart, Target, and The Home Depot. There also are applications, such as blister packaging, where the plastic is simply unnecessary, which is the best alternative given the urgent need to reduce plastics overall.
- **Organochlorine microplastics (PVC and PVDC) contaminate people, food, water, and wildlife.** PVC and PVDC break down into tiny particles called microplastics. PVC microplastics are among the most dominant and harmful types of microplastics. Recent peer-reviewed studies have found PVC microplastics in placentas, lungs, arteries, testicles, and human brains, confirming that particles can pass biological barriers and accumulate over time. Reducing these organochlorine microplastic exposures and their contamination of the environment and wildlife should be a high priority for the agency.
- **Phasing out PVC and PVDC also helps to achieve state solid waste and climate goals.** PVC and PVDC packaging are not recyclable and can contaminate and ruin other plastics recycling, resulting in more plastic going to incinerators and landfills. Major global companies in the U.S. Plastic Pact identify PVC and PVDC as problematic materials for this reason. The 2020 state [solid waste report](#) to the legislature recommends banning problematic and unnecessary plastic packaging. Because PVC

and PVDC are made from fracked natural gas and petrochemicals, continued growth in plastics production—expected to triple globally—threatens to undermine Washington progress on climate change.

- **The production of PVC plastic disproportionately impacts environmental justice communities.** The production of PVC plastic releases hundreds of thousands of pounds of organochlorine chemicals (ethylene dichloride, vinyl chloride) into the air every year in the U.S. Vinyl chloride factories produce billions of pounds of vinyl chloride to make PVC plastics, often in low-income communities and communities of color. Among the people living within a three-mile radius of these plants, 63% are people of color, compared to 41% nationwide. People in low-income communities of color have been forced to relocate due to vinyl chloride production and contamination from vinyl/PVC plants in at least four different communities in Louisiana including Mossville, Reveilletown, Morrisonville, and Plaquemine.

We urge you to reconsider and not delay review of alternatives to PVC and PVDC in packaging. Thank you.

Sincerely,

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