



Association
of Washington
Business

Washington State's Chamber of Commerce

September 16, 2011

Dr. Alex Stone
Safer Chemical Alternatives Chemist
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Stakeholder Scoping Questions – Draft Alternative Assessment Guidance

Dear Dr. Stone

The Association of Washington Business (AWB) and the business organizations listed below, appreciate the opportunity to provide initial comment on Ecology's "Alternative Assessment Guidance".

As you are aware, the issue of product safety and the use of "safe alternatives" is a top priority to each of our industries, and for those reasons we hope to remain engaged with the department as it moves forward with this effort.

Our respective associations continue to support rational, scientific and effective risk-based approaches to chemicals management and assessment that foster the safe use of materials and chemicals in products. We also continue to strongly believe that this risk-based approach needs to be achieved by a unified solution at the federal level. State-by-state chemical management programs and different data submission requirements only contribute to a patchwork of regulations and put a strain on limited resources within companies and governments. While, we understand that the department has an interest in looking into this issue specific to the State of Washington, we strongly encourage the department to find ways to work with the federal EPA for a nationally focused solution.

ASSOCIATION OF WASHINGTON BUSINESS

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We appreciate the department agreeing to meet earlier this week to answer specific questions and address concerns the business community has regarding the Guidance. This meeting was essential in order to better evaluate the complex questions posed in the scoping document and to be able to respond appropriately to Ecology's request for input from stakeholders.

Again, we hope that you continue to keep our associations engaged on this very important issue. If you should have any questions, please don't hesitate to contact any of us directly.

Sincerely,

Association of Washington Businesses (AWB)
Washington Retail Association (WRA)
Northwest Pulp & Paper Association (NWPPA)
American Chemistry Council (ACC)
American Cleaning Institute (ACI)
Consumer Specialty Products Association (CSPA)
Grocery Manufacturers Association (GMA)
International Fragrance Association North America (IFRA)
Personal Care Products Association (PCPC)
Toy Industry Association (TIA)

c.c. Karen Terwilleger, Ecology
Carol Kraege, Ecology
Linda Glasier, Ecology