

Comments on Ecology Continuum for IC2 AA Guidance

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Q1

- 1) Sounds great – especially like the notion of using the selective portions of the guidance applicable for specific user.
- 2) Unsure if Ecology is planning on adding components for their use only, or urge states to collectively include in the developed guidance. (these are important factors to consider, especially functional equivalence, and cost effectiveness)
- 3) From a practical standpoint – I have to ask who the users are. Many users FIRST step (after recognizing something is more hazardous or toxic than they should be using) may be to read case studies/stories/glean info from substitution databases, on what others in similar situation have already done. Small to medium sized (SMEs) businesses may not be going through such a rigorous analysis. So, I would want to make sure this effort will have end users. (Not just be a great guidance document (the scope sounds like it will be!!!) that is only usable by the scientific/technical/toxicological community.

Q2

- 1) Not technical – but let us know the plan for completed assessment results done under this continuum and if results will be publically available.
- 2) Possibly Ecology's components address this but not explicitly. IMO, if you find a chemical of concern, the P2 hierarchy should always be to look for ways to AVOID/ELIMINATE the need for a chemical, THEN look into the substitution/reformulation, etc.. If the group concurs – I would suggest using the word eliminate (or related term) up to the top of the list of Ecology components. (*It is sort of implied in "manufacturing process redesign", but not explicit*).
- 3) *An aside – the "whether the alternative is commercially available" is redundant*

Q3

- 1) Published standardized assessment results for specific compounds – accessible by others (so no duplication of work). (Is this part of the plan?)
- 2) Ability to use the guidance to the level needed for specific assessor.

Q4 See 1, #3 above.

Q5 Yes

Q6 The overarching/outline/protocol/steps per 5th bullet, including the types of end users who might be using each requirement of the continuum. (e.g., SME may only be interested in a cursory hazardous assessment, or access to any pre-existing analyses). I wonder if some sort of flow chart or pictorial diagram might be useful?

Q7 No

