



March 12, 2012

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

Via email: lgla461@ecy.wa.gov

Dear Dr. Stone:

On behalf of the American Chemistry Council, American Cleaning Institute, Consumer Specialty Products Association, IFRA North America, Grocery Manufacturers Association, Personal Care Products Council and Toy Industry Association, we would like to express our appreciation to the Washington Department of Ecology for your efforts in engaging stakeholders in the development of guidance on alternatives assessment for chemicals.

Safety, leading to protection of public health and the environment, is the foundation of our industries, our member companies, and the products they produce. Alternatives analysis is a core element to the development of safe consumer products. The fundamentals of the process are routinely executed as part of industry's ongoing research and development and product improvement. The key to innovation, and meeting consumer needs and preferences, is the ability of manufacturers to draw on a variety of existing decision-making tools and approaches for developing products. As such, concepts that leverage existing practices in the product development paradigm should form the basis of an effective regulatory framework for alternatives analysis.

The product optimization process is iterative, complex, and case-by-case. Thus, it is inherently difficult to comment on individual aspects of the multi-step alternatives analysis process. Industry representatives will continue to review the modules as they are posted, and we encourage you to continue your present approach to their release. However, we intend to comment on the entirety of the guidance package rather than commenting on individual modules.

We look forward to continuing the dialogue with the Department of Ecology and other stakeholders on the guidance on alternatives assessments.

Sincerely,

Emily Kolarik
American Chemistry Council

Paul DeLeo
American Cleaning Institute

Kristin Power
Consumer Specialty Products Association

John Hewitt
Grocery Manufacturers Association

Jane Wishneff
IFRA North America

Tom Myers
Personal Care Products Council

Joe Gregorich
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