

Comments on the Alternatives Assessment Process
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September 12, 2011

1) What are your three main observations with the continuum process proposed by Ecology?

We are excited that Ecology is moving forward with this important process for alternatives assessment guidance that will help companies assess the chemicals they use. We also appreciate the opportunity to provide input. Companies around the globe have been successful in phasing out harmful chemicals by using various alternatives assessment tools— many of which are their own proprietary tools. This is an opportunity for businesses to have access to this kind of tool, not only in Washington state, but throughout the country. This service to business will provide consistency and credibility for a methodology that can help reduce costs and results in environmental and health protections. We look forward to working with the agency on this document.

We have several thoughts on the continuum approach:

A) The continuum proposed by Ecology may be too complicated. Alternatives assessments tools should focus on the following information:

- Hazard data, including information on toxicity, persistence, and potential for bioaccumulation;
- Performance of available alternatives and their cost;
- Whether or not the product can be made without the use of the chemicals being considered because there are process or material changes that can be made.

This is just one tool that companies can use to identify safer alternatives and minimize the toxic impacts of their products. Other tools taking into account risk (risk assessment) or end-of-life issues (life cycle assessment), should be considered separate and distinct. Lumping all of the issues into this one tool could make it completely unwieldy and unworkable.

B) Companies need to have a way to put chemicals in certain categories to prioritize action. It is useful to put chemicals with certain characteristics into categories— from high to low—so that companies can see what chemical may be a safer chemical. I am not sure that I see in this scope that the guidance will help prioritize chemicals or help companies identify safer chemicals. Will this be included?

C) The scope does not adequately reflect how widely this tool is already being used by businesses—large and small. Including company examples and how this

guidance will build on the practical experiences of business to help other businesses is something that should be included.

2) Has Ecology left anything out?

Again, I don't think this guidance document or tool can include everything companies need to consider. This tool should primarily look at hazards of the chemicals. Companies and people assume that chemicals are tested for safety and environmental impact and that they meet some standard before they are used. Unfortunately this is not the case, so users of the chemicals (product manufactures) are left with the problems down the road. Without the regulation to protect chemical users, they need tools to assess the various chemicals and help them make choices. This is one of those tools that can help evaluate the hazard information that exists for the chemicals. It should not include all considerations that a manufacturer may take into account.

3. What are some of the positives this process might bring?

- a. Cost savings for businesses that substitute harmful chemicals for safer chemicals.
- b. Protections for public health, Puget Sound, and renewed consumer confidence in products.
- c. Reduced burden on government and the public for waste disposal, health care costs and cleanup.
- d. Greater availability of safe products for consumers.

4. Do you have any other concerns with this stakeholder process?

The timeline for the final product seems too long given that companies already have tools they are using that are based on some models such as the Green Screen. We think the process should be simplified to: A proposed draft by November 2011; comments by January 2012; final document by February 2012.

5. Do you think the continuum approach is the best approach?

We believe it could make the process too complicated as mentioned above. This tool cannot answer all of the questions and the more that is added to it, the more diluted it becomes. We also think it will take too long and cost too much money to develop such a complicated approach.

6. Do you have additional input?

No, we don't have any other input at this point.

