

Washington State Nurses Association

Public Hearing Testimony:

My name is Karen Bowman. I am an Occupational Environmental Health Nurse Specialist, and I'm speaking on behalf of the Washington State Nurses Association today, which is really the only professional organization that represents all 130,000 registered nurses in Washington State.

We have been in strong support of the Children's Safe Product Act and the Chemicals of High Concern for Children since its inception years ago, and it remains the top legislative priority for us because we support legislation that protects the health of children, and we support the rights of parents and grandparents to choose safe toys and products for their children. And we are in solid support of continuing to strengthen the CHCC List (is that what you guys are calling it? I think that's pretty good). We continue to support these programs because they provide valuable ongoing information on what chemicals manufacturers are using in the products for kids. It's critical information for parents and grandparents and lawmakers.

We are fortunate, so fortunate to live in Washington State which really is leading the nation in protecting children from harmful chemicals. The Children's Safe Product Act is the cornerstone of that effort. WSNA supports maintaining the strength and effectiveness of this program with new science as we learn more about the harmful chemicals that affect a child's opportunity to reach and maintain their full genetic potential, as you heard from the previous testifier. The information derived from the Children's Safe Product Act is critical in the component of how we protect our children.

WSNA supports and we are in awe of the Department of Ecology's oversight in the Children's Safe Product Act and the CHCC List. Overall, WSNA supports the Department of Ecology's proposed changes to the Children's Safe Product Act rule. Adding an additional 21 chemicals including several toxic flame retardants and hormone disrupting phthalates to the CHCC List will expand the usefulness of this report. However we are concerned about the omission of the following chemicals in the proposed list.

We would like to include ... we do see that you're proposing to add the PFOAs, but PFOAs just generally not added to the product as a breakdown component. So, we're requesting the inclusion of PFOA along with the related compounds that breakdown to PFOA. And this is an approach that's already been done by the European Union, and it's supported by their manufacturers. We also suggest inclusion of the phthalates DIPP, DEMP, and DIOP. We are encouraged to see... encouraged to see that the proposed rule adds three phthalates to the reporting list. We request inclusion of these others because they are, as mentioned before they are serious endocrine disrupters and can cause harm to developing bodies.

Also, with D4: D4 has been linked, as you heard previously, to endocrine disruption and reproductive toxicity, and we don't want this omitted from the CHCC List. Since reporting began, it's been reported over 2,000 times in children's products manufacturing. And so many of these products (you know, footwear, toys, baby items, bedding) are not generally associated with D4, so pointing to the need to investigate more fully the sources of exposure to this toxic chemical is critically important.

Nurses are advocates, and we're charged with protecting our patients from unnecessary and harmful exposures to toxic chemicals in items that they use every day. Ecology's Children's Safe Product

Act program and reporting requirements is a critical tool in this goal. We urge Ecology to answer, excuse me, to address these important issues in the final rule. Thank you very much.