

Zero Waste Washington

Public Hearing Testimony:

This is Heather Trim, Executive Director with Zero Waste Washington, and we are working to look upstream to redesign products and increase recycling and other ways of dealing with products through their entire lifecycle. And especially we're concerned about two things related to this rule. One is the fact that we don't want there to be toxic exposures to humans during the use of the products, including children. And we also are concerned with the products at the end of life where they are causing problems, for example, in compost or where they're causing problems when they're recycled or reused and new populations get exposed to those same chemicals.

So, we'd like to commend Ecology for the work that you've done on this rule. This is a very, very complex problem that you're working on, and it is clear that you have applied lessons learned from the use of the rule, of the law thus far. And I reviewed the summary document that you created, and you can see that all these chemicals are showing up in food, and urine, blood, dust, and water. So, this is ... these are multiple exposures that humans, and especially children, are being exposed to. So, we would like to commend you on the list that you are ... the updated chemicals that you are including, and would also like to support the requests that you add three phthalates: DIPP, DEMP, and DIOP.

What we are hearing is that there are more and more phthalates that are being shown up to have toxic issues than just the six that have been traditionally regulated in, for example, Superfund Sites and things like that. We also think it's premature to exclude D4 at this time, very ... even ... looking ... first off that there are not enough studies that have been done to date, and clearly it is not something that should be eliminated until you have a little bit more data on it, and then at that point make that decision.

So, thank you again for your work on this, and I would be very happy to have further communications with you down the line. Thank you.