

Toxic Free Future

Public Hearing Testimony:

My name is Nancy Uding. I am a Program Director with Toxic-Free Future. And Toxic-Free Future would like to extend our thanks to the Department of Ecology for the opportunity to express our support for the addition of chemicals to Washington's CHCC List.

The data collected under the Children's Safe Products Act has been extremely valuable in learning about specific uses of toxic chemicals in children's products. However, the initial list established by Ecology for reporting did not include a number of chemicals that are used at high levels in products, and to which children's exposure is a serious concern. While Toxic-Free Future strongly supports the proposed addition of 21 chemicals to the CHCC List, we respectfully request Ecology reconsider some of its proposed actions regarding the list update.

First of all, Toxic-Free Future requests that Ecology expand the proposed listing of 'PFOA' to 'PFOA and related substances.' By 'related substances,' we mean chemicals that have the potential to degrade to form PFOA. By expanding the listing in this way, Ecology would obtain information on the compounds that are intentionally used in products and not just the final degradation product, PFOA. This approach would be consistent with the one used in the European Union.

We also strongly support the addition of all of the flame retardants proposed by Ecology for addition to the CHCC List. We do request that Ecology also add Dechlorane Plus and BDBPE to the list as we requested in 2013 and 2016. There's new information showing that a breakdown product of BDBPE is bioaccumulating in people and affecting thyroid hormone levels. In this 2016 paper, researchers report the breakdown product 2,4,6-Tribromophenol in human placenta at levels higher than those of PBDEs. Both of these chemicals meet the toxicity and exposure criteria for listing, and information on their use is needed.

We also strongly support the proposed addition of three phthalates to this CHCC List: DCHP, DIBP, and DNPP. However, we also request that Ecology add three more phthalates which were included in our 2016 petition: DEMP, DIOP, and DIPP. As industry moves away from phthalates that have already been restricted, it is critical that we obtain information about likely substitutes. Since we have submitted our petitions and additional information to Ecology, Toxic-Free Future has identified several more studies that contribute to information about exposures to DEMP. There's a couple of exposure studies that were published in 2013 and 2015. Also, we located a study on DIOP toxicity, and another one on exposure. And in a study published in 2013, DIOP produced developmental toxic effects and impaired development of the male reproductive tract in laboratory animals. And in 2016, a study shows DIOP in 87% of house dust samples.

Toxic-Free Future also feels strongly that D4 should remain on the CHCC List. D4 is considered by the EU to be a Category 1 chemical on its priority list of suspected endocrine disrupting chemicals. Our position is that uterotrophic assays do not provide the only evidence of endocrine disruption, and there are ample studies showing D4 endocrine disruption through other assays. There's also ample evidence of D4 exposure to children. First, its current presence on the CHCC List has resulted in it being reported to Washington State over 2,300 times by manufacturers of children's products. Based on this alone there's a need to investigate more fully the sources of exposure to children to D4, and it underscores the need to retain D4 on the CHCC List. And we have also submitted additional information on D4 exposure.

So, once again, thank you for the proposed addition of chemicals to the CHCC List and for the opportunity to testify here today. We will submit our complete reference comments including these new resources we've found by the comment due date. Thank you.