

Juvenile Products Manufacturers Association (JPMA)

Hello Kara,

On behalf of the Juvenile Products Manufacturers Association (JPMA) please see the attached comments in response to the WAC 173-334 Children's Safe Products Reporting Rule.

Sincerely,
Danielle Iverson

Danielle Iverson
Director, Legislative and Regulatory Affairs
Juvenile Products Manufacturers Association (JPMA)
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May 12, 2017

Washington State Department of Ecology (DOE)
Hazardous Waste & Toxics Reduction Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: WAC 173-334 Children's Safe Products Reporting Rule

Dear Ms. Steward,

On behalf of the Juvenile Products Manufacturers Association (JPMA), thank you for the opportunity to provide comments on the proposed changes to the Washington Children's Safe Products Reporting Rule.

JPMA is an international trade organization of more than 200 companies in the United States, Canada, and Mexico. The Juvenile Products Manufacturers Association (JPMA) is a national not-for-profit trade association representing 95% of the prenatal to preschool products industry including the producers, importers, and distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. These products are sold globally and nationally, and consistency of safety regulations is a critical aspect of product development.

As it relates to the proposed amendments to the Washington Children's Safe Products Reporting Rule, JPMA appreciates the opportunity to have been engaged in the rulemaking process throughout its development. JPMA members have a shared commitment to children's product safety with the understanding that a collaborative relationship with Ecology and other safety agencies is key to ensuring success in protecting our most vulnerable citizens.

We appreciate the inclusion of Section WAC 173-334-100 (b), (which stipulates that a manufacturer of a children's product containing a CHCC above the de minimis level may request an extension for submission of the report required on January 31, 2019, if this would be the first report required by the manufacturer and the manufacturer will be reporting more than one product or chemical) has been incorporated as a proposed amendment to the rule.

This provision is critical for those small and medium sized companies that might be interacting with this Act and program for the first time, as a result of the expansion of the requirements. Although Ecology did not propose a time frame for the extension, we urge

the Department to work with manufacturers (to which this amendment applies) on an individual basis to understand the challenges associated with reporting under the Act.



Thank you for your time and consideration in this matter. Please contact Danielle Iverson of my staff at 202-429-0436 if you have any questions or would like additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kelly Mariotti".

Kelly Mariotti, JD, CPA, CAE
Executive Director - JPMA