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Rochelle Routman,
Chief Sustainability & Quality Officer

February 19, 2020

To: saferproductswa@ecy.wa.gov

Subject: Comments - Safer Products for Washington Law

HMTX Industries (HMTX.global) is a \$700M flooring materials manufacturer whose brands service a diverse cross-section of the building material marketplace. The HMTX Family of companies includes Halstead, the leading supplier of LVT to The Home Depot; Metroflor®, our signature residential brand in North America; Teknoflor®, our focused healthcare and institutional brand; Aspecta®, our high-end global contract brand for architects and designers; and Vertex, the international supply chain division for HMTX. The main product that we sell is (ortho-) phthalate-free LVT (luxury vinyl tile) for both residential and commercial use.

Our experience has taught us that consumers are increasingly curious about the products they are purchasing, including the plasticizers used to manufacture vinyl flooring. Research shows consumers have an increased desire to know where products are made and the manner in which they are produced. HMTX's commitment to material ingredient transparency led us to participate in various initiatives to disclose product ingredients to the consumers including the International Living Future Institute's DeclareSM label program (<https://living-future.org/declare/>).

We greatly appreciate the opportunity to comment on this important legislation that is under development in the State of Washington and are pleased to provide our comments as requested by the State of Washington, Department of Ecology.

HMTX firmly agrees with the position that vinyl flooring products should not contain ortho-phthalates. Putting words into action, we have eliminated ortho-phthalates from the manufacturing of products offered in the USA by the following HMTX divisions: Halstead, Metroflor, and Aspecta. HMTX took this step due to scientific data currently available on such chemicals. Results of laboratory experimentation indicate that ortho-phthalates have detrimental effects to animals, and there is growing concern of possible effects to humans, primarily because there is evidence that humans can absorb ortho-phthalates dermally. While some parties have called for further study to determine the exact impacts to humans before action is taken, our guiding philosophy is that of the precautionary principal. Recently, in partnership with the Resilient Floorcovering Institute (RFCI), we developed an industry certification program, ASSURE Certified, that requires the avoidance of ortho-phthalates as a prerequisite for certification of rigid core flooring (<https://rfci.com/assure-certified-rigid-core-flooring/>). Under the ASSURE Certified program, individual or total ortho-phthalates cannot exceed 1,000 ppm when tested in accordance with CPSC-CH-C1001-09.4 or GB/T 22048-2015.

Therefore, HMTX Industries would be honored to support you in your efforts eliminating ortho-phthalates in the manufacturing of vinyl flooring. Please contact us at your earliest convenience, as we would sincerely like to work with you and others that are working so hard to improve vinyl flooring products. You can reach me at x@hmtx.global or 404-717-1538.

With gratitude,

A handwritten signature in black ink, appearing to read 'Rochelle I. Routman'.

Rochelle I. Routman
Chief Sustainability and Quality Officer
HMTX Industries