



EUROPEAN RESILIENT FLOORING MANUFACTURERS' INSTITUTE

ERFMI – Montoyerstraat 24, B-1000 Brussels Belgium

Hazardous Waste & Toxics Reduction Programme
Washington State Department of Ecology
P.O.Box 47600
Olympia
WA 98504-7696
U.S.A.

ERFMI vzw
Montoyerstraat 24
B-1000 Brussels
Belgium
Tel.: + 32 2 2 87 08 71
Tel.: + 32 2 2 87 08 72
GSM: + 44 737553948
info@erfmi.com
www.erfmi.com

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Re: Washington Priority Consumer Products Draft Report to Legislature (Jan. 2020; Publication 20-4-004).

To whom it may concern

The European Resilient Flooring Manufacturers' Institute (ERFMI) submits these comments to the state of Washington Department of Ecology on Ecology's Priority Consumer Products Draft Report to legislature submitted as part of the Safer Product for Washington (SPW) programme, which we have been made aware of by the Resilient Floor Covering Institute (RFCI)

ERFMI represents the interests of resilient flooring manufacturers in Europe. Its 17 members manufacture over 90% of the PVC floor coverings produced in the European Union and Switzerland. Many of them also sell flooring in the United States. Our members are committed to transparency about the performance of their products and their sustainability. Together with governments and test institutes our members develop strict product standards and universal information systems.

In Europe low molecular phthalates are no longer used in vinyl flooring as the industry moved away from their use, following the need for authorisation under the European Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). The sunset date for authorisation was 2015 and the European flooring industry started much earlier to substitute their use for alternatives plasticisers, in some cases nearly 20 years ago.

The industry has been moving away from ortho phthalates altogether over the last ten years, replacing them with alternative non phthalate plasticisers.

In addition to this with regard to the safety of phthalates in existing installations of vinyl flooring, ERFMI would like to point to the fact that because phthalates are so widely used, they have undergone extensive testing for possible health and environmental effects and are among the most widely researched of all chemical substances. In Europe, the European Commission, the European Chemicals Bureau (ECHA) and EU Member States have undertaken 10-year-long comprehensive scientific assessments of both high and low molecular weight phthalates under the EU Risk Assessment Regulation. <https://www.plasticisers.org/resources/fag/>
High molecular weight phthalates (DINP, DIDP, DPHP, DIUP, and DTDP): Risk assessments showed positive results regarding the safe use of this group of substances. They have all been registered under REACH and do not require any classification for health and environmental effects,

Chairman: **Robert N.B. Smith (James Halstead PLC)**
Managing Director: **Jane Gardner**

Technical Manager: **Dr Jochen Zimmermann**

nor are they on the Candidate List for Authorisation. Low molecular weight phthalates are now required to be authorised for use under REACH and are no longer used by our industry.
(plasticisers.org)

ERFMI and its members welcome the involvement of legislatures in informing the public concerning hazardous products and providing protection but feel that the legislation under discussion in Washington while well intentioned is based on outdated studies of materials long out of production.

Yours sincerely



Jane Gardner
Managing Director
ERFMI, European Resilient Flooring Manufacturers' Institute