

Forbo Flooring Systems

Hazardous Waste and Toxics Reduction Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7696

Re: Comments of Forbo Flooring System on the Safer Products for Washington Priority Consumer Products Draft Report to Legislature (Jan.2020; Publication 20-04-004)

To whom it may concern:

Forbo Flooring Systems submits these comments to the State of Washington Department of Ecology (Ecology) on Ecology's Priority Consumer Products Draft Report to Legislature. Forbo Flooring Systems of North America appreciates the opportunity to comment on this important program.

Forbo Flooring Systems, a responsible market leader in the production of floor covering appreciates Ecology's goals in developing and implementing the Safer Products for Washington (SPW) program under the 2019 Safer Products for Washington Act. We at Forbo feel that everyone has the right to have a beautiful, clean, healthy floor to work, learn and live on, now and in the future. We see this as our social responsibility and do this by acting as a sustainable company.

As a manufacturer, we are concerned about the contribution that products can make to the concentrations of priority chemicals found in homes, workplaces, and the environment. Forbo believes in full public transparency of our material ingredients and our impacts on the environment as measured by Life Cycle Assessment (LCA) for all our products and process elements as reported through Environmental Product Disclosures.

It is with this in mind, that we are in full support of SPW. We believe that every flooring manufacturer should discontinue the use of Ortho-phthalate as a plasticizer in PVC flooring. Many manufacturers have moved towards the use of alternative plasticizers including terephthalates. This move and identification as "phthalate free" is a term only referencing the new PVC component and, in many cases, excludes the recycled PVC content found in the backing of both PVC resilient and PVC backed carpet tile. The SPW will help those other manufactures who still currently use, and/or have as a contaminate in the recycled content ortho-phthalate plasticizer.

Forbo Flooring Systems is a global market player in Linoleum, Flotex flocked flooring, Coral entrance systems, carpet tiles, and vinyl floor coverings. All of our vinyl flooring products are free from ortho-phthalate plasticizer including our recycled content. Forbo Flooring is also the largest manufacturer of PVC free flooring including our linoleum products.

Forbo Flooring proudly stands with likeminded organizations such as Kaiser, The International Living Future Institutes Declare Label and Pedal programs, Well Building Institute, Healthcare Without Harm's Healthy Flooring Criteria and Healthy Furniture criteria that have also identified these chemicals of concern and the product classes containing these priority chemicals.

Forbo Flooring System applauds Ecology's goals in developing and implementing the SPW program, including the identification of priority products. Forbo embraces the objectives of this regulatory initiative and the method that the State is using to transform markets to safer alternatives. Forbo has committed to be a Compliance-plus company and we go beyond legal regulations. We integrate sustainability considerations into all our decisions and monitor, evaluate and publish our sustainability performance.

Please feel free to contact me should you need further details.

Sincerely,

Denis Darragh
Vice President
North America

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Creating better environments

creating better environments



FLOORING SYSTEMS

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Sincerely,

A handwritten signature in black ink, appearing to read "D. Darragh".

Denis Darragh
Vice President
North America