



March 2, 2020

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

RE: Priority Consumer Products Draft Report to the Legislature

Dear Washington State Department of Ecology:

On behalf of the Household & Commercial Products Association, I offer the following comments on the *Priority Consumer Products Draft Report to the Legislature* and the Implementation of Safer Products for Washington.

The Household & Commercial Products Association (HCPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. HCPA member companies employ hundreds of thousands of people globally. Products HCPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Our member companies provide a wide range of consumer and institutional products that could be potentially be consider priority product as identified by Safer Products for Washington Implementation Phase 2 as outlined in the Priority Consumer Products Draft Report to the Legislature.

HCPA members are committed to manufacturing products that are thoroughly evaluated for human and environmental safety before they are brought to market. Our members' products meet or exceed the safety requirements of state and federal agencies in the United States charged with regulating those products. Our industry produces products that improve the quality of human life, are necessary to maintain public health, and protect against dangerous diseases, infestations and unsanitary conditions. HCPA supports green chemistry policies that are safety-based, emphasize the importance of scientific principles, and provide all stakeholders the opportunity to provide meaningful input to the process.

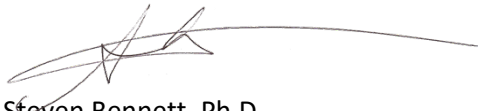
We appreciate the intent of utilization of the category approach with Priority Product identification, but this approach makes it very difficult for stakeholders to provide meaningful input. It is also possible that this approach would identify a much broader number of potential products and manufacturers than intended causing unintentional market disruptions or forcing the Department of Ecology to expend resources on issues outside of the scope of the regulation.

A practical approach would be to clearly identify chemical substances within the categories via CAS Numbers or another standard identifier. This would more clearly allow manufacturers to readily identify substances

of interest in their supply chains and increase the likelihood of the Department of Ecology receiving actionable information. If that is not possible, the category should be described via physiochemical properties or toxicological parameters or other defining characteristics to ensure clarity.

HCPA and its member companies were very active in the development of California's Safer Consumer Products Regulation and we encourage the Department of Ecology to actively engage industry throughout the stakeholder process. Thanks for your time and attention and we look forward to working with you.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Steven Bennett', with a long horizontal line extending to the right.

Steven Bennett, Ph.D.
Senior Vice President, Scientific & Regulatory Affairs