

February 29, 2020

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

**Subject: The Safer Products for Washington Priority Consumer Products Draft Report to Legislature
(Jan. 2020; Publication 20-04-004)**

To whom it may concern:

Thank you for the opportunity to submit comments regarding the State of Washington Ecology Department's Priority Consumer Products Draft Report to Legislature, submitted as part of the Safer Products for Washington program.

As an industry leader in the manufacture of vinyl flooring and a member of the Resilient Floor Covering Institute (RFCI), an association representing the interests of the resilient floor covering industry, we support and hereby incorporate by reference the comments on the Draft Report submitted by RFCI on March 2, 2020.

As explained in more detail in the comments submitted by RFCI, a significant body of evidence demonstrates that exposure to ortho-phthalates in vinyl flooring (to the extent such chemicals may be present in those products) presents minimal to non-existent risk to health or safety. Concerns of health risks associated with exposure to phthalate-containing vinyl flooring are therefore misguided, as are administrative efforts to restrict those products.

Additionally, there has been a dramatic reduction in the use of ortho-phthalates in the manufacture of vinyl flooring, including all vinyl flooring manufactured by Armstrong Flooring. As discussed in RFCI's comments, vinyl flooring manufacturers have already moved away from the use of ortho-phthalates towards preferred alternatives, including terephthalates. Terephthalates are structurally very different from the ortho-phthalates that drive the listing of "phthalates" as a priority chemical class under the SPW program. This transition was in part due to public pressure related to the "Mind the Store" campaign, whereby the largest home improvement retail chains in the United States and others adopted policies to phase out ortho-phthalate-containing PVC flooring by the end of 2015.¹

¹ See, e.g., Consumer Reports, "Lumber Liquidators Will Stop Selling Vinyl Flooring Made with Reprocessed Plastic" (Nov. 20, 2015), available online at <https://www.consumerreports.org/flooring/Lumber-Liquidators-to-clean-up-its-vinyl-floors/>.

Because of these retail store policies, the vast majority of vinyl flooring sold in the state of Washington (and throughout the United States) is now manufactured without ortho-phthalates.²

The experience of Armstrong Flooring supports this industry trend. Armstrong prohibits the use of ortho-phthalates as a raw material of our vinyl flooring and has done so for many years. Our voluntary, proactive shift towards the use of alternatives is evidence of the wider trend within the vinyl flooring industry and demonstrates Armstrong Flooring's continued commitment to the production of safe, sustainable products—and responding to public concerns regarding perceived risk even where data demonstrate risk is minimal to non-existent. We appreciate the Washington State Department of Ecology's goals in developing and implementing the SPW program and are happy to provide additional information to the Department as it works to finalize its list of priority products.

Armstrong Flooring, Inc. appreciates the opportunity to comment on this important regulatory initiative. If you have any questions or require further information about these comments, please contact me at 717-672-7952 or at simonroe@armstrongflooring.com.

Sincerely,



Susan Monroe
Product Stewardship Manager
Environmental, Health & Safety

² See, e.g., Safer Chemicals, Healthy Families, "Success!—Home Improvement Retailers Follow Through on Commitments to Remove Phthalates from Flooring" (June 27, 2019), available online at <https://saferchemicals.org/2019/06/27/success-home-improvement-retailers-follow-through-on-commitments-to-remove-phthalates-from-flooring/>.