

TCL Comment Letter

Submitted via email at: SaferProductsWA@ecy.wa.gov.

**RE: Draft Regulatory Determinations Report to the
Legislature: Safer Products for Washington -
Implementation Phase 3 (November 2021, Publication 21-
04-047)**

I am writing to provide feedback on the draft regulatory determinations proposed under the Safer Products for Washington related to the regulation of electronics and electrical equipment.

My company/organization is concerned about the scope of the chemistries and the breadth of the product categories proposed for regulation.

TCL Industrial Co., LTD

The main products are TV and Sound Bar .

Plastic shell on electrical and electronic products Are using organic halogen flame retardants add, to ensure that the material fireproof performance, to ensure the safety of products, such as comprehensive restrictions on organic

halogen flame retardants, will seriously affect the production, the influence on the performance of the product shell fire, in the short term there is no better production material substitution.

At present our company is also actively response to the environmental protection, Also gradually replacing part of the organic halogen flame retardants added , Like Regulation (EU) 2019/2021 sets limits for halogen flame retardants, PBDE(1000ppm) ;PBB(1000ppm); SCCP(prohibit).PCB (prohibit);SCCP(prohibit) ;and (Br and Cl < 630ppm respectively) in the inner and rear shells and supports of products. It is suggested to initially refer to the limits required by European regulations .

As the Department of Ecology finalizes its recommendations, we strongly urge the State to consider the following:

a. Electric and electronic device casings are generally not a significant source of exposure to chemicals.

b. The chemistries proposed for regulation cover a diverse range of substances. We would encourage Ecology to recognize the distinction within the broad

class of organohalogen flame retardants and focus its efforts on relevant subcategories or subclasses that may meet the criteria of the Safer Products for Washington law. Any recommendations for chemical regulation should also consider the global regulatory framework for chemicals, electronic products, and product safety certification.

c. The product category of electronic casings is extremely broad. We would encourage Washington State to focus its recommendations on a narrower scope of final goods that clearly meet the criteria of the Safer Products for Washington law.

d. The current recommendations have the potential to undermine overall product safety and performance. We urge Washington State to take a more robust and complete approach for assessing alternatives, which takes into account overall safety, performance, innovation, and sustainability factors. Failure to do so may lead to regrettable substitution in selecting alternatives.

e. Much of the report relies on marketing literature or non-authoritative sources that may not be appropriate and may not be the best source of information for assessing the true feasibility of equivalency of potential alternatives. This is especially relevant given the breadth of chemistries and product categories proposed for regulation.

Any recommendations need to accurately and fully assess the important socio-economic considerations required under the Safer Products for Washington law.

We would be happy to provide additional information and details specific to these issues and our business and products.

Sincerely,

TCL / Regulatory Technical Section