

# Skyworth

See attachment for comments.

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

Dear Sir/Madam,

I am writing on behalf of *Skyworth Group Co., Ltd.* to provide feedback on the draft regulatory determinations proposed under the Safer Products for Washington related to the regulation of electronics and electrical equipment.

Located in the city of Shenzhen, next to Hong Kong, *Skyworth Group Co., Ltd.* is one of the leading manufacturers and exporters of TV sets in China.

As Department of Ecology proposes to restrict all organohalogen flame retardants (OFRs) in plastic casings of electronic and electrical equipment, we have two major concerns.

One is that restricting use of OFRs will significantly raise the cost of raw materials, and in turn significantly raise the cost of

the TV sets exported to Washington State. Based on our experience, we will increase the cost by about 50% for alternatives to OFRs.

The other one is that restricting use of OFRs has the potential to undermine overall product safety and performance. We advise the Department 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.

We would be happy to provide additional information if you need.

Sincerely yours,

此处是联系人的姓名，职务和邮箱