

# Green Science Policy Institute

See attachment for comments.

**Feedback on Draft Regulatory Determinations Report to the Legislature:  
Safer Products for Washington Implementation Phase 3, Publication 21-04-047**

We are scientists and policy experts who develop and communicate peer-reviewed research about chemicals of concern. We collaborate with leading scientists and translate technical information for key decision-makers. The Green Science Policy Institute's research and policy work has reduced the use of harmful chemicals, including flame retardants and PFAS (per- and polyfluoroalkyl substances), from being added to consumer products worldwide.

**To reduce American's exposure to harmful flame retardants, protect ecological health, and encourage manufacturers to remove harmful chemicals from consumer products, we support the implementation of Safer Products for Washington 21-04-047.**

We support the Department of Ecology banning organohalogen flame retardants in electronic casings. Exposure to organohalogen flame retardants results in serious health effects in product users, factory workers, and electronics recycling workers, and the lifecycle of the chemical production, use, and disposal is environmentally damaging. Furthermore, the smoke resulting from the burning of products containing organohalogens is even more toxic, making fires more dangerous for people nearby and the firefighters working to extinguish the fires. There are safer alternatives available that ensure fire safety while reducing chemical harm, which have already been implemented in other states and in Europe. It is appropriate to group all organohalogen flame retardants together as a class.

We support the Department of Ecology banning organohalogen and organophosphate flame retardants in recreational polyurethane foam products. As there are no significant fire risks in facilities that use these foams (demonstrated by the lack of flammability standards for recreational foam), flame retardants are not necessary in these facilities. Rather, the use of flame retardants in these facilities only harm users, which are often young children most susceptible to the health harms of flame retardants. Smoke alarms, sprinkler systems, and evacuation plans are all safer and more effective ways of preventing fires in such facilities.

Additionally, while our comments today have focused on flame retardants, the proposed regulations on polychlorinated biphenyls, per- and polyfluorinated substances, bisphenols, alkylphenol ethoxylates, and phthalates would all benefit human and environmental health.

**Implementing the proposed changes to regulation in Washington would help to ensure that harmful and often unnecessary flame retardants are not used in many products and would help with closing the information gap regarding the use of flame retardants.**

**For further information, please contact Lydia Jahl, [Lydia@GreenSciencePolicy.org](mailto:Lydia@GreenSciencePolicy.org).**

*Mobilizing Scientists, Government, Industry and Consumers to Reduce Toxics*