

Puget Sound Partnership

I am submitting the attached comment letter on behalf Laura Blackmore, Director, Puget Sound Partnership.

Todd Hass
Special Assistant to the Director

January 21, 2022

To Whom It May Concern:

The Puget Sound Partnership strongly supports the proposed regulatory determinations that would require restrictions and/or reporting requirements for the priority classes of chemicals recently outlined by Ecology. We are pleased to see how the draft regulatory determinations would reduce significant sources and uses of priority chemicals and limit their release into the environment. It is reassuring to see how often Ecology has determined that there are safer, feasible alternatives available for the various priority chemical-product combinations. Furthermore, in the instances where alternatives are not yet known (like bisphenols in food can linings), Ecology has proposed reporting requirements to set the stage for future identification of less harmful options.

We commend Ecology and the authors for comprehensively outlining the human health concerns and rationales for the proposed increases in regulation. In addition, we appreciate how the report references several contaminants of emerging concern that were identified by Governor Inslee's Southern Resident Orca Task Force (such as PBDEs, bisphenols, and phthalates).

Following an extensive engagement period with stakeholders and tribes, we are about to release the draft *2022-2026 Action Agenda for Puget Sound* in which partners have elevated the following two key strategies related to chemicals of emerging concern:

(1) Promote the development and use of safer alternatives to toxic chemicals.

- Key opportunities for 2022-2026 include: Educating decision makers on gaps and limitations of existing state and federal regulations, increasing the use and demand for safer alternatives, and passing legislative reform to prevent toxics.

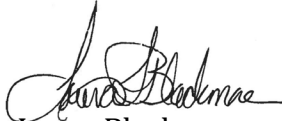
(2) Prioritize, prevent and manage (regulations, permits, and incentives) chemicals of emerging concern.

- Key opportunities for 2022-2026 include identifying, prioritizing and monitoring chemicals of emerging concern (CECs) (including integration of human health risk and thresholds), expanding agency capacity to accelerate planning and regulatory actions, and developing voluntary programs to prevent, remove or treat CECs.

We believe those two strategies and their associated opportunities are completely aligned with and support this set of regulatory determinations by Ecology.

In conclusion, we applaud Ecology for taking a practical, proactive approach in advancing regulatory action. We are pleased to see how the report's authors have conducted a comprehensive review of actions with examples from other nations (like the European Union), instances at the U.S. federal and state levels, and voluntary measures adopted by retailers. On the whole, such precedents serve to affirm the draft restrictions and reporting requirements for each chemical-product combination and should provide a grounded, foundation from which to pursue future rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Blackmore". The signature is fluid and cursive, with a large initial "L" and "B".

Laura Blackmore
Director, Puget Sound Partnership