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cc: SaferProductsWA@ecy.wa.gov

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To the HWTR Publications Coordinator:

This communication is from the Fragrance Science & Advocacy Council (FSAC) regarding Washington Department of Ecology's report to the legislature on Draft Regulatory Determinations for Priority Chemical-Products, under its Safer Consumer Products program.

The Fragrance Science and Advocacy Council (FSAC) is a recently formed North American trade association with a mission to provide an organizational framework for fragrance innovators and suppliers to discuss and develop strategic approaches in three focus areas: federal and state legislative and regulatory activity, science advocacy, and communications. FSAC brings together fragrance innovators across the industry to support the development of science based public policies that ensure the safety and compliance of fragrance and their ingredients for use in all categories. Our members comprise greater than 70% of the fragrance market in North America and include the four largest fragrance and flavor companies in the world: Firmenich, Inc., Givaudan, Inc., IFF, Inc., and Symrise, Inc.

The FSAC requests assurance that the proposed "Safer Alternatives to Phthalates," and especially to Diethyl Phthalate (DEP), is not a static list. Please confirm that other solvents may be added to the list as additional safe and sustainable alternative solvents become available.

In addition, FSAC would like to comment on the proposed additional alternatives ("Carrier Oils and Isolated Aroma Chemicals"). The proposed carrier oils are not suitable for fragrance dilution and could cause insolubility.

Furthermore, there must be a major error in listing Vanillin and Ethyl Vanillin, both of which are pure crystals and cannot be used or recommended as a solvent, or used as an alternative to phthalates in fragrance formulations.

The FSAC proposes:

- Identified "Safer Alternatives" (that can operate as a solvent or fixative):
  - Dipropylene glycol
  - Isopropyl myristate
  - Triacetin
  - Benzyl alcohol (may have a high amount of odor)
- Carrier Oils (to be used in conjunction with, or instead of, Safer Alternatives) - only for extraction, not fragrance dilution:

- Castor Oil (has poor solubility)
- Grapeseed Oil
- Sweet Almond Oil (costly; has regulatory issues)
- Coconut Oil
- Jojoba Oil

Thank you for the opportunity to comment on this report. Please contact us if you have questions or concerns.

Kind Regards,

FSAC