David Krizan

I support a comprehensive approach eliminating these priority chemicals from consumer products. The regulations ought to be as broad as possible in order to limit the inevitable new uses of these toxic chemicals in other consumer products.

Additionally, RCW 70A.350.060 outlines the confidentiality of information and records. How will consumers know that products they buy in stores - or on the vast number of online sites - meet these new regulations?

I strongly urge that information on these (and all future) priority chemicals be provided to consumers in a transparent format, such as a simple report card (available online and with the product) indicating whether the product is in compliance for each priority chemical. Absence of such a report card should be cause for consumer complaint and penalty to the seller and or manufacturer.

The simple presence or absence of a priority chemical ought not meet the standard required to keep 'confidential any records furnished by a manufacturer under this chapter that relate to proprietary manufacturing processes or chemical formulations used in products or processes'. I trust that a manufacturer will need to clear a high bar to show that keeping information on the materials in their products confidential is not 'detrimental to the public interest'.

Finally, I would add that from a practical point, if a manufacturer has proprietary manufacturing processes or materials that can be readily reverse engineered and bench-marked by competitors via a teardown analysis, then what reason is there to withhold this information from the public, other then to prevent embarrassment? Whether a competitor uses this information unlawfully or not then is a separate matter.