

Washington State Council of Firefighters

See attachment for comments.



Washington State Council of Fire Fighters

Affiliated with: AFL-CIO
International Association of Fire Fighters
Washington State Labor Council

January 28, 2022

Cheryl Niemi
Hazardous Waste and Toxics Reduction Program, Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7696

Dear Ms. Niemi:

The Washington State Council of Fire Fighters (WSCFF) supports the Department of Ecology (Ecology)'s banning organohalogen flame retardants in electric and electronic plastic device casings and flame retardants in recreational polyurethane foam. WCSFF membership includes more than 8,000 fire fighters, EMTs, and paramedics organized into 120 affiliated union locals of the International Association of Fire Fighters (IAFF).

The WCSFF has been working on reducing the use of toxic flame retardants in products for more than a decade. We participated in the fire safety committee established in a 2007 law (RCW 70.405.050) that found safer alternatives identified by the Ecology (RCW 70A.405.030(2)(b)) for the organohalogen flame retardant deca-BDE in electronic and computer plastic enclosures met applicable fire safety standards. The committee unanimously found that the safer alternative met applicable fire safety standards. More than ten years later, this is still the case—fire safety standards will not be compromised.

The use of organohalogen flame retardants threatens the health of our members. Cancer is now the leading cause of death among fire fighters, and we have higher rates of cancer than the general population. Substituting safer alternatives to organohalogen flame retardants is pure common sense and reduces unnecessary exposures to chemicals that can cause a range of health effects, including cancer.

We urge the agency to move forward and ban these harmful chemicals in products.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Dennis J. Lawson". The signature is written in a cursive, flowing style.

Dennis Lawson
WSCFF President