

Gary Jones

Request for comment deadline extension.



December 2, 2021

Ms. Cheryl Niemi
Hazardous Waste and Toxics Reduction Program, Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7696
cheryl.niemi@ecy.wa.gov

Re: Safer Products for Washington – Draft Legislative Report; Extension of Public Comment Period Request

Dear Ms. Niemi,

The following organizations, representing a broad cross section of ink manufacturers, printing operations, and coating manufacturers are writing to request an extension of the public comment period on the upcoming Department of Ecology's (ECY) draft Safer Products for Washington report to the Legislature.

ECY released on November 17, 2021, its draft legislative report on regulatory determinations for the first chemical/product categories under the Safer Products for Washington law that includes inks and coatings. In its announcement, the public comment period closes on January 14, 2022.

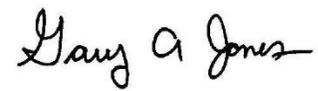
Regarding inks and coatings, the report is proposing regulatory actions that could significantly impact a diverse set of industries, products, retailers, and consumers. The section on inks is particularly challenging as the report does not include any specific information on the testing that was conducted by ECY. The report indicates the study will be released at some point in the future but does provide a release date. Since ECY has stated it is going to pursue regulatory actions, it is imperative that adequate time be provided to review the results of the ink study so that detailed comments can be prepared.

In addition, having the public comment period running over the holiday season, makes it difficult for our organizations to consult with our members to ensure they can provide input. Understanding the scientific information used by ECY as the basis for its planned regulatory actions will require a thorough technical review. Such a review is critical to ensuring that the proposed regulations are based on the best available science and meet the intent of the enacting statute.

For these reasons, we respectfully request that the formal opportunity to provide input on the draft report be extended to February 14, 2022 for coatings and perhaps a longer period for the ink section, depending upon when the study is released for review by ECY. We understand ECY has a June 2022 deadline to submit the report but believe providing an extended comment period for inks and coatings will not jeopardize meeting this requirement.

Thank you in advance for your consideration of this request. We look forward to working with ECY on the implementation of the Safer Products for Washington program. Should you have any questions, please contact any of the signatories below.

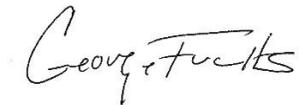
Sincerely,



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