

## Comment on Chapter 173-337 WAC – Safer Products Restrictions and Reporting

Green Science Policy Institute scientists collaborate with academic scientists to develop and communicate peer-reviewed research about chemicals of concern and translate technical information for decision-makers. The Institute's research and policy work has reduced the use of harmful chemicals, including flame retardants and PFAS, in consumer products worldwide.

**To reduce American's exposure to harmful chemicals, protect ecological health, and encourage manufacturers to stop the use of harmful chemicals in consumer products, we support the Safer Products for Washington proposed rule, Chapter 173-337 WAC.**

We support restricting organohalogen flame retardants because their exposure is associated with cancer as well as hormonal and neurological health harm. The burning of products containing organohalogen chemicals leads to increased smoke and toxic gases, making escape more difficult and fires more dangerous. These harms are clearly demonstrated in the cost-benefit analysis conducted by the Washington Department of Ecology.

When used in electronics, organohalogen flame retardants can result in serious health harm for product users and workers. The lifecycle associated with flame retardant chemical production, use, and disposal can harm ecosystems and the environment. The European Union and New York State have already implemented restrictions on organohalogen flame retardants in electronics, so precedence for this restriction already exists.

It is scientifically sound and appropriate to group all organohalogen flame retardants together as a class due to the presence of halogen atoms bonded to carbon atoms. Banning one chemical at a time can result in replacement chemicals similar in structure, function and harm. For a circular economy, the phase-out of organohalogen flame retardants in electronics will avoid recycling plastic enclosures with halogenated flame retardants into other consumer products like kitchen utensils.

Flame retardant exposure is also of concern in recreational polyurethane foam products. As there are no significant fire risks in facilities that use these foams, flame retardants are not necessary. Rather, the use of flame retardants in these foams only harms users, who are often children most susceptible to the health harms of flame retardants. Smoke alarms, sprinkler systems, and evacuation plans are all safer and more effective ways of preventing fire injuries in such facilities.

We also support the proposed restrictions on carpets and rugs, indoor furnishings, and aftermarket stain- and water-resistant treatments containing PFAS as this would reduce direct consumer exposure to this harmful chemical class. We suggest that PFAS be restricted in outdoor furnishings rather than reported on. All such uses are unnecessary as safer alternatives already exist. Similarly, the chemical classes of bisphenols and phthalates are also harmful and should be restricted to only essential uses where safer alternatives do not exist. The proposed actions regarding flooring, personal care products, can linings, and thermal paper will protect health and the environment from harm. We suggest that manufacturers implement these changes as quickly as possible.

In summary, the Green Science Policy Institute supports the proposed rule. Restricting the listed priority chemicals will improve the health of people and the environment.

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