



July 14, 2023

Department of Ecology, HWTR  
Safer Products for Washington program  
Olympia, WA 98504-7600

Comments submitted electronically at <https://hwtr.ecology.commentinput.com/?id=aUG8fNS4B>

**Re: Draft Identification of Priority Chemicals, Report to the Legislature, Safer Products for Washington, Cycle 2, Implementation Phase 1 - June 2023, Publication 23-04-038**

The Vinyl Institute appreciates the opportunity to provide comments to the Washington State Department of Ecology on the Second Cycle of the Safer Products Program. Below are several points related to process and content that demonstrate areas where the Department should consider updating.

- 1) The process seems to have been done through a lens of bias rather than by demonstrating actual exposures. The Department begins the process with an open-ended survey asking people what toxics they fear. Without first educating people about what risks they are experiencing in everyday life, the results are highly prone to fear mongering driven by outside interests and campaigns that influence fears, so that those are fed back into these survey results, and ultimately to the identification of priority chemicals by the Department. This is a disservice to the community, notably to those who did not respond to the survey, nor were aware of the survey being offered.
- 2) Page 28, first paragraph, "Cadmium is used... as a stabilizer for polyvinyl chloride..." This statement is incorrect. The Vinyl Institute is not aware of any PVC compounds sold containing cadmium-based stabilizers in the United States. This example further illustrates how the process is being presented through a lens of bias from the authors themselves.
- 3) On pages 16 and 56, the Department suggests that a rationale for inclusion of chemicals in the priority list is to avoid regrettable substitutions. However, there is bias built into the justification of avoiding certain chlorinated substances because they are associated with PVC, without providing any context whatsoever about PVC alternatives. On Page 59, the paragraph on PVC illustrates this issue:
  - a. *PVC and neoprene are both examples of non-biodegradable materials. Continued and expanding use of non-biodegradable materials and their contribution to environmental pollution is a well-recognized problem (Persson et al., 2022). Production of chlorinated polymers, including PVC, presents additional environmental health challenges, partly due to the energy-intensive processes and materials used in production of chlorine (European Commission, 2004; Healthy Building Network, 2018).*

Notably, the specific mention above of the "energy-intensive processes and materials used in production of chlorine" highlights a grave misunderstanding of PVC, and of the comparative materials used in the building sector. Seattle-based NGO Building Transparency has been instrumental in developing the necessary context for a more informed discussion about impacts on greenhouse gas emissions. There are several categories of PVC building products which are available at [www.buildingtransparency.org](http://www.buildingtransparency.org) demonstrating the relatively low carbon intensity of PVC products, especially when considering alternative materials used in those same applications, such as bitumen roofing, tile flooring, and fiber-cement or brick cladding.

Furthermore, invoking “additional environmental health challenges” from the production of PVC while ignoring equivalent or greater issues with other materials is needlessly unjust, arbitrary, disparaging, ensures negative outcomes for environmental and human health, and hurts the credibility of the State of Washington Department of Ecology with manufacturers and the public.

- 4) On Page 64, Table 12, the CHCC Rationale Summary on Vinyl Chloride (CAS RN 75-01-4) illustrates the bias of this report by providing only an excerpt from the 2006 ATSDR statement about PVC exposure in children. The excerpt used in Table 12 limits the statement to the following:

“Children’s products such as bath toys, squeeze toys, and dolls are often made from PVC. Chewing or sucking on these products has the potential to release any unpolymerized vinyl chloride from the object.”

Instead, using the rest of the paragraph in the same 2006 ATSDR reference cited, the Department should provide the reader with the appropriate context:

“Children’s plastic products such as bath toys, squeeze toys, and dolls are often made from PVC. Chewing or sucking on these toys has the potential to release any unpolymerized vinyl chloride from the object; **however, no quantitative data exists regarding this potential exposure route and it is unlikely that there are significant levels of vinyl chloride in PVC-based toys. Vinyl chloride has not been detected in samples of human maternal adipose tissue, maternal blood, cord blood, or breast milk. No body burden studies that quantitatively or qualitatively identified vinyl chloride in children were located.**” (emphasis added)

\*\*\*\*\*

The Vinyl Institute welcomes the opportunity to work with Department of Ecology on revising and improving the Draft Report so that a less arbitrary and biased approach to listing chemicals can be facilitated, and so that the community is better served by the outcomes that may result from it.

Sincerely,



Domenic DeCaria  
Vice President – Regulatory & Technical Affairs  
The Vinyl Institute