

Side x Side Architects

Safer Products for Washington (SPW) Cycle

Department of Ecology comment

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- Gladys Ly-Au Young, Side x Side Architects
- Architect, working in affordable housing sector
- In partnership with others working on AF policy and scientists from TTF and Habitable

From peer-reviewed robust data sources,

1. Of the PVC made (7300 Mt x 12% = 876 Mt, Geyer), the **construction sector used most of the PVC** (69% Geyer).
2. **PVC in the construction sector is increasing at an alarming rate.** Project a 250% increase from 2019 to 2060. (Plastic in general is also seeing a 250% increase during this same period.)

	2019 (OECD)	2060 (OECD)
PVC use in construction	36 Mt	90 Mt
% increase		250%
Plastic use in construction	77 Mt	193 Mt
% increase		250%

3. Most of our plastic waste is not recycled. 9.3% is recycled (meaning 90.7% is not recycled) (Geyer). 15.3% is incinerated (Geyer) creating extremely harmful dioxin. 75.4% go to the land fill and ocean (Geyer), **creating detrimental harm to our environment and our people.**
4. **Who is impacted the most?**
5. "Pollution sources and contaminated sites are concentrated in **BIPOC communities.** Toxic exposures add to other stressors, such as poverty and racial discrimination. People most vulnerable to toxic exposures often live in **affordable housing.**" (TFF)
6. Ecology did not add vinyl chloride to the Cycle 2 regulations. **We strongly advocate the need to regulate the use of PVC in building materials. It is as much an environmental issue as well as a justice issue for the affordable housing sector.**

Question

From Slide 31, you have listed plastic packaging. Are you considering PVC building materials in addition to plastic packaging when regulating brominated and chlorinated substances? The construction sector used most of the PVC and the rate of usage is increasing in the affordable housing sector which is disproportionately impacting that population from up to downstream impacts.