

PRINTING Industries of WASHINGTON

July 15, 2025

Washington State Department of Ecology
Attn: Hazardous Waste and Toxics Reduction Program
PO Box 47600
Olympia, WA 98504

Re: Safer Products WA, Priority Consumer Products

To Whom It May Concern,

On behalf of the Printing Industries of Washington, which represents hundreds of small printing, publishing, and packaging companies across the state, I am writing you today to share our deepest concerns over the draft Safer Products target list. The printing industry in Washington State is proud to employ more than 14,000 team members state-wide and happily contributes hundreds of millions of dollars to the state economy. Besides our concerns with targeting products that are crucial to our industry's livelihood and the lack of available and economically feasible alternatives, we believe that the Department of Ecology is circumventing federal preemption and overplaying its regulatory role.

The Printing Industries of Washington and our members care deeply for our environment and are proud of the steps the industry has taken to reduce our footprint on the planet. From improving our energy efficiencies and reducing extra waste to the high rate at which our facilities recycle, we are working to do our part. However, we respectfully disagree with the Department regarding their decision to include PCBs in ink as part of their Safer Products process. We are concerned about federal preemption and believe that the alternative assessment process will be inadequate without proven scientific analysis, testing techniques, and a clear quantitative limit on permissible incidental PCBs. It is important to recognize that "0" is not a practical measure in the context of chemicals and chemistry. Our worry is that without a defined target, the Department's research may not yield accurate or useful information.

In addition to our concerns regarding federal preemption, the PIAW is worried about the emphasis placed on inadvertent PCBs (iPCBs). We believe that the Department has not taken sufficient time or consideration to fully understand the complexities of inks, printing technology, and the application of ink to substrates in the production process. Although our industry may not be prominently featured in public discussions, printing is an essential aspect of nearly every product used daily—from toothpaste to printed medical information. Our industry plays a crucial role, and we rely on inks to accomplish this. We propose collaborating with the industry to conduct a comprehensive, inclusive, and scientifically rigorous study on these products.

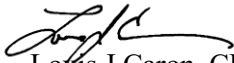
In addition to our points above, please consider some of our concerns around the Department's identifying of printing inks and iPCBs:

- When the Department of Energy (DOE) identified printing inks for the Safer Products program in 2020, it concluded that "colored pigments contained in inks are the largest source of inadvertent PCB contamination in consumer goods." However, this conclusion lacks specific references, studies, or supporting documentation that could be located. The Department did not follow recognized scientific protocols to examine the various products and other sources that contain iPCBs, evaluate potential releases from these sources, or perform a risk assessment that appropriately ranks these sources. Furthermore, the Department did not test any inks for the presence of iPCBs until late 2021, and even then, it only tested a limited number of inks that do not represent the wide variety used in printing applications.

- We are concerned about the absence of supporting information or data for the claims regarding acceptable alternatives. Determining an acceptable alternative pigment involves considering many factors, including its physical and performance characteristics, optical qualities, and compatibility with different printing technologies. It is troubling that industry experts have not been included in this discussion. The fact that a pigment belongs to a certain color class (e.g., yellow) does not mean that any yellow pigment can be universally substituted. Inks are not interchangeable, and it has taken decades of experience and evaluation to establish the proper combinations of pigments in the appropriate ink systems. A single attribute, such as visual appearance, cannot dictate usability; a proper evaluation requires extensive testing and measurement of critical parameters during both the manufacturing process and the use of the finished product.
- It is important to note that not all pigments containing chlorine have iPCBs. The DOE has not identified which specific pigments contain iPCBs, and regulating all chlorine-containing pigments is neither scientifically valid nor economically feasible. Approximately 150 common pigments used in printing contain chlorine, but not all contain iPCBs and most contain only trace amounts.
- Lastly, we respectfully urge the Department to include the Printing Industries of Washington and our members in the alternative assessment phase of the Safer Products process. While the manufacturers will play a key role in this research phase, the Department must not overlook the businesses and industries based in Washington State that rely on these products for their success and survival. The printing process is very complex and does not have a “one size fits all” solution. Before the Department designates an ink as an acceptable alternative, it must also consider and consult the manufacturing side of the industry.

The Printing Industries of Washington is grateful for the opportunity to comment and appreciates your consideration.

Sincerely,



Louis J Caron, CPA (Inactive)
President

cc: S. Louderback, SL Public Affairs