



California's Safer Consumer Products Program: Asking the Questions

Anne-Cooper Doherty
Safer Consumer Products Program
August 24, 2016



Department of Toxic Substances Control



Cal/EPA

The Framework: Avoid Regrettable Substitutes

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toxicology

Replacement for toxic chemical in plastics, receipts may be just as toxic

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BAD TRACK Manufacturers may have ditched using the potentially toxic chemical BPA (bisphenol A) in common products such as receipts and plastic bottles in favor of an equally toxic relative, bisphenol S, new research suggests.

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Chemical in BPA-Free Products Linked to Irregular Heartbeats

New ingredient in plastic bottles, receipts has same effect on lab animals as the old chemical does.

Water bottles that are free of the controversial chemical bisphenol-A (BPA) hang on display at an outdoor supply store in Arcadia, California.
PHOTOGRAPH BY DAVID WILSON, GETTY

By **Brian Clark Howard**, National Geographic
PUBLISHED FEBRUARY 26, 2014

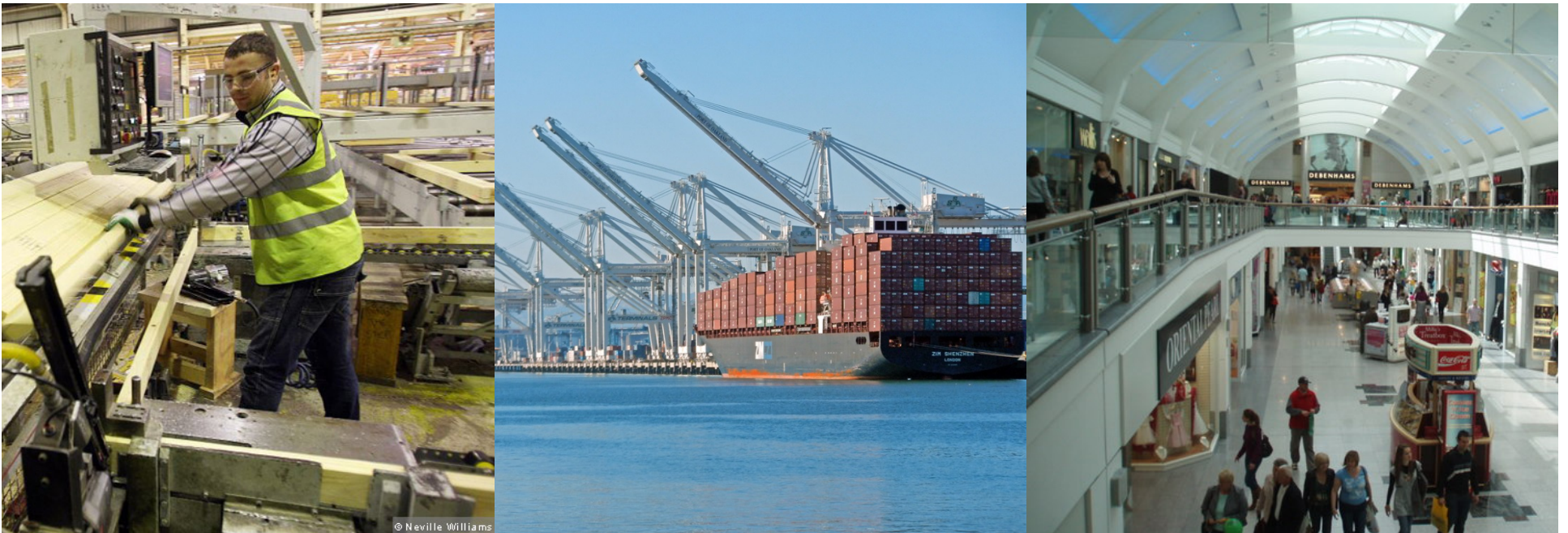


Goal of SCP Program and Green Chemistry

- Rethink product and chemical design
- Create safer substitutes for hazardous ingredients in consumer products
- Emphasize safer products and healthier lives by reducing and eliminating use of toxic chemicals



The CA Framework: Producer Responsibility



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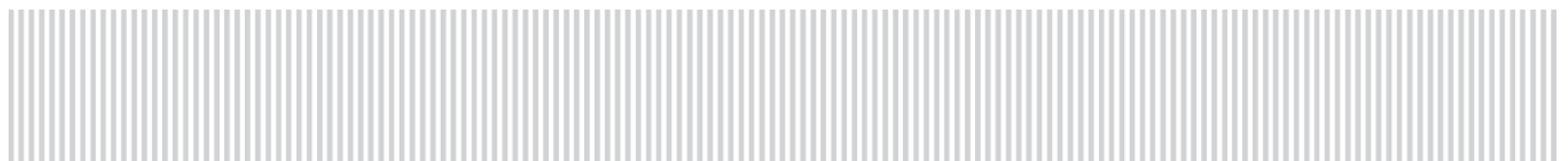
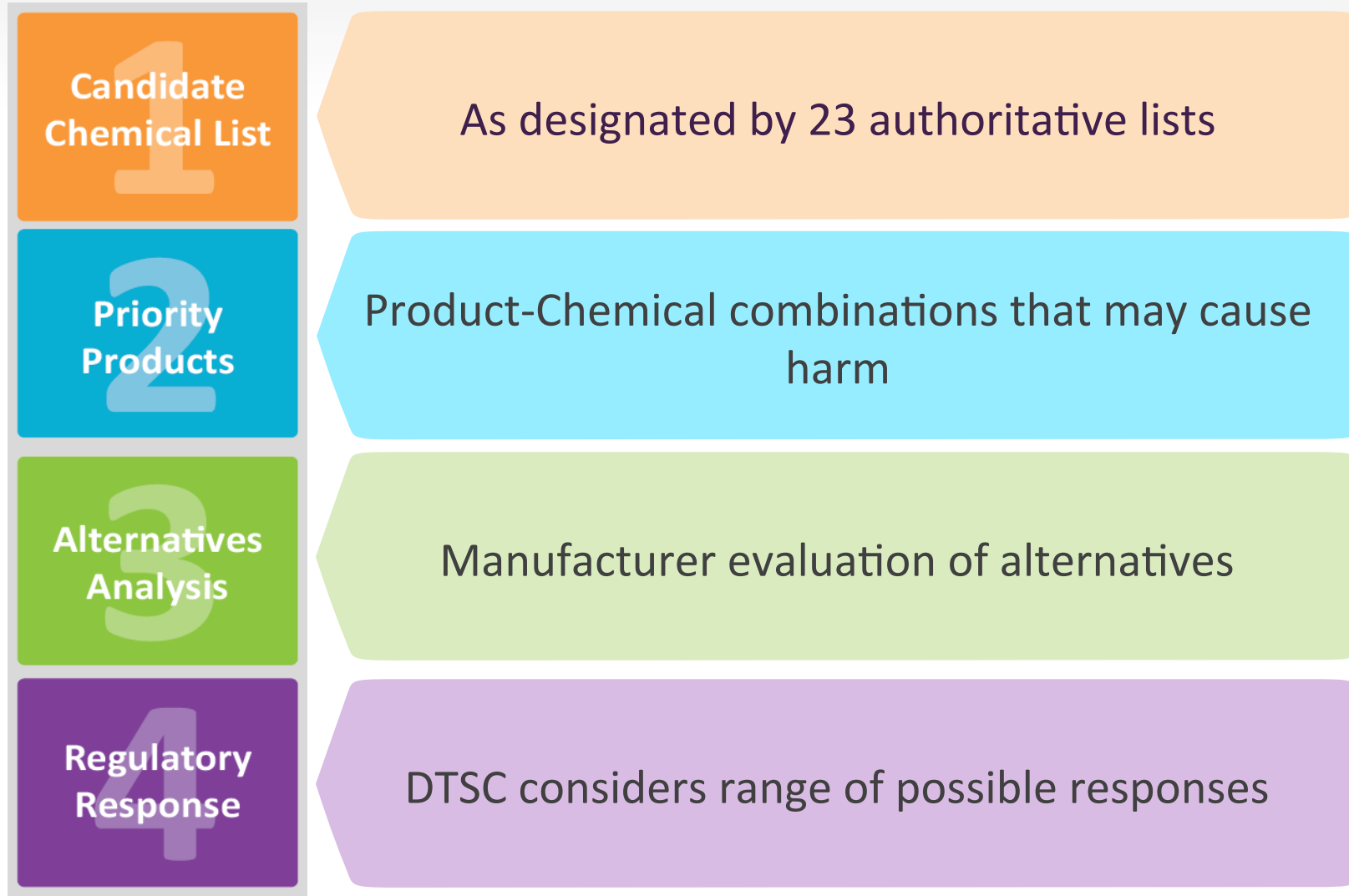


Safer Consumer Products Foundational Questions

- Is it necessary?
- Is there a safer alternative?



Safer Consumer Products Framework



Public Input in SCP Process

- Opportunities throughout the process to provide input and data
 - Chemical hazard, exposure, and use in products
 - Product use and exposure
 - Alternatives
 - Emerging concerns



Chemicals

1 Candidate Chemical List

- [23 Authoritative Lists](#)
- Updated Quarterly
- Menu of chemicals we can evaluate for listing as part of a Priority Product
- ~2,000 chemicals

Exclusions

- FIFRA pesticides
- Prescription drugs
- Radioactive Chemicals
- Natural toxins
- Breakdown products



Safer Consumer Products Information Management System

Welcome to the Safer Consumer Products (SCP) Information Management System (CalSAFER). You can use CalSAFER to submit and view a variety of documents including: comments on proposed regulations, work plans and guidance, petitions and their supporting documents, Priority Product notifications, and alternatives assessments. All information (except confidential business information) submitted through CalSAFER will be posted, available, and searchable to all users.

If you become a registered user (required for some activities), you will be able to quickly find and continue your activities when you log back in. To become a registered CalSAFER user, [click here](#).

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CANDIDATE CHEMICALS SEARCH

Search for chemicals included on DTSC's Candidate Chemical list



MAKE A COMMENT

Submit comment on documents, work, plans, workshops, etc..



SUBMIT A PETITON

Submit petitions to add or remove chemicals, chemicals lists, products..

<https://calsafes.dtsc.ca.gov>



Product

(Product-ChemicalCombinations)

2

Priority Product

Potential exposure to the Candidate Chemicals in the product **AND**

Potential for exposures to contribute to or cause significant or widespread adverse impacts

- Chemicals are considered in the product context
- No numerical weighting or ranking system
- Narrative standard



Initial Priority Products



**Children's Foam-Padded
Sleeping Products
containing TDCPP/TCEP**



**Paint Strippers
containing Methylene
Chloride**



**Spray Polyurethane Foam
Systems with MDI**





Future Product Selections: Priority Products Work Plan



Priority Product Work Plan

Three Year Work Plan | 2015 - 2017

SAFER CONSUMER PRODUCTS BRANCH
DEPARTMENT OF TOXIC SUBSTANCES CONTROL



2
Priority
Products

2015 – 2017 Priority Product Work Plan Categories



**Beauty, Personal
Care and Hygiene
Products**



**Household/Office
Furniture/
Furnishings**



**Building Products –
Paint Products,
Adhesives, Sealants,
Flooring**



**Cleaning
Products**



**Fishing and Angling
Equipment**



**Office Machinery
Consumable Products**



Clothing



Priority Product Process



Public Input

- Comment periods for:
 - Priority Product Work Plans
 - Priority Product Regulations
 - *Comment period for TDCPP/TCEP in children's foam-padded sleeping products closes Monday, August 29th*

- Workshops
 - By the end of the year



Seeking Public Comment on the Listing of
**Children's Foam-Padded Sleeping Products
Containing TDCPP or TCEP as a Priority Product**

[GO TO CalSAFER TO COMMENT](#) ▶

- Product/Chemical Combination Petitions



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2
Priority
Products



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Re: Listing BPA under the DTSC Safer Products Program

This petition asks DTSC to identify bisphenol A (BPA)-based epoxy resins used as linings of food and beverage cans as a priority product/chemical combination.

Purpose

BPA resins are commonly used as linings in food cans. The most recent survey of BPA use, conducted by several non-profit organizations, found BPA resins in about 1/3 of the canned food products tested. Another 1/3 of the linings were made of BPA resins mixed with alternative resins. (1)



Alternatives Analysis (Industry Step)

3 Alternatives Selection

Key Concepts

- Manufacturer evaluation
- Narrative standard
- Available for public comment

Answers key questions:

- Is it necessary?
- Is there a safer alternative?
- Have regrettable substitutes been avoided?

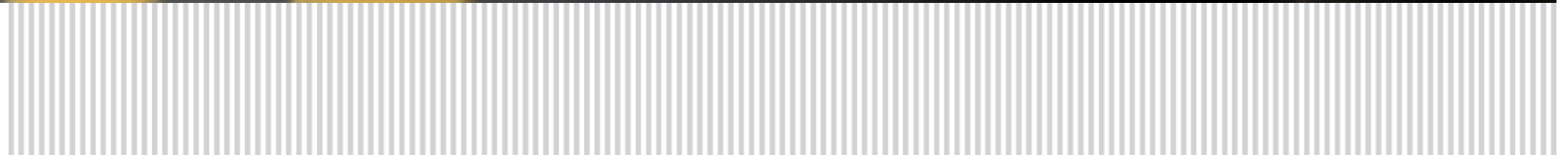
Broader than AA frameworks. Requires:

- Ecological impacts
- Life cycle impacts
- Economic analysis



Alternatives Analysis

What are the trade offs?
What information is available?
What are the data gaps?
What will meet the performance criteria?
Does this alternative have a downside?



Factors to be considered during AA:

- Adverse environmental impacts, public health impacts, waste and end-of-life effects
- Environmental fate
- Materials and resource consumption impacts
- Physical-chemical properties and hazards
- Associated exposure pathways



4

Regulatory Response

- Draft Regulatory Response proposed by DTSC
- Available for Public Comment
- Final Regulatory Response

Many possible responses:

- No response
- Additional info to DTSC
- Additional info to consumers
- Additional safety measures
- Sales restrictions/prohibitions
- End-of-life product stewardship
- Research funding





SAFER
CONSUMER
PRODUCTS (SCP)



Thank you

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