California’s Safer Consumer Products Program: Asking the Questions

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Safer Consumer Products Program
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The Framework: Avoid Regrettable Substitutes

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

Chemical in BPA-Free Products Linked to Irregular Heartbeats
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
Safer Consumer Products

Foundational Questions

- Is it necessary?
- Is there a safer alternative?
Safer Consumer Products Framework

1. Candidate Chemical List
   - As designated by 23 authoritative lists

2. Priority Products
   - Product-Chemical combinations that may cause harm

3. Alternatives Analysis
   - Manufacturer evaluation of alternatives

4. Regulatory Response
   - DTSC considers range of possible responses
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
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.

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As always, we want to hear your suggestion and questions. Click on the help link located above. If you would like to learn more about the Safer Consumer Products Program, please visit our informational web page.

https://calsafer.dtsc.ca.gov
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
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

Research

Priority Product

PP Rulemaking

Alternatives Analysis 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

- Product/Chemical Combination Petitions
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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)

**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
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
Thank you

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http://www.dtsc.ca.gov/SCP

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