Ms. Jackie Buttle  
Acting Regulations Coordinator  
Department of Toxic Substances Control  
P.O. Box 806  
Sacramento, CA 95812-0806  

Via Electronic Submission  

Re: Safer Consumer Products Regulation, Chapter 55 of Division 4.5 of Title 22 of the California Code of Regulations (Z-2012-0717-04) Department Reference Number: R-2011-02 (April 2013)  

IPC – Association Connecting Electronics Industries appreciates the opportunity to comment on the above referenced draft Safer Consumer Products Alternatives Regulation. We recognize and appreciate the effort DTSC has invested in developing the current draft. We support the proposed solicitation of public comments at the end of the alternatives assessment process and the use of an alternatives analysis threshold that is higher than the substance’s PQL for certain substances. However, we remain concerned that the Candidate Chemicals list remains overly broad.  

IPC supports DTSC’s proposal to solicit public comment on alternatives assessment at the end of the alternatives assessment (AA) process. Stakeholders generally are not scientific experts and their feedback could misguide the AA process. The process for evaluating AAs would be better served by qualified experts.  

IPC supports DTSC’s proposal to specify an alternatives analysis threshold for certain Candidate Chemicals rather than using the PQL as the alternatives analysis threshold for every Candidate Chemical. Relying solely on a substance’s PQL presumes that the mere presence of an identified Candidate Chemical is reason to suggest potential harm. Establishing an alternatives analysis threshold for Candidate Chemicals would help ensure valuable resources are spent on evaluating Candidate Chemicals present in Priority Products in greater quantities. Using valuable resources on insignificant uses of chemicals would result in a minimal benefit to human health and the environment at great cost to industry and DTSC. Specifying an alternatives analysis threshold will help ensure that the most significant uses of Candidate Chemicals are addressed.  

As detailed in our February 28, 2013 comments submitted to DTSC, IPC strongly encourages DTSC to use a scientifically based approach in the Safer Consumer Products Regulation. Substances that exhibit the greatest hazards, such as those known to cause cancer, developmental or reproductive harm, be persistent, bioaccumulative and toxic (PBT) in the environment, and pose the greatest exposure to consumers, should be given priority. When evaluating consumer products to be covered by the regulation, DTSC must consider the level of exposure to the priority chemicals in order to ensure the utmost protection to human health and the environment.
By considering both hazard and exposure when identifying chemical-product combinations to be evaluated, DTSC will make the biggest reduction in risk to human health and the environment.

Thank you for the opportunity to comment on the draft regulation. Please do not hesitate to contact me should you have any questions.

Sincerely,

Stephanie Castorina
Manager, Environmental Programs