

The webinar will begin shortly.

# Safer Products for Washington: Rulemaking Discussion

Implementing RCW 70A.350: The Pollution Prevention for Healthy People and Puget Sound Act

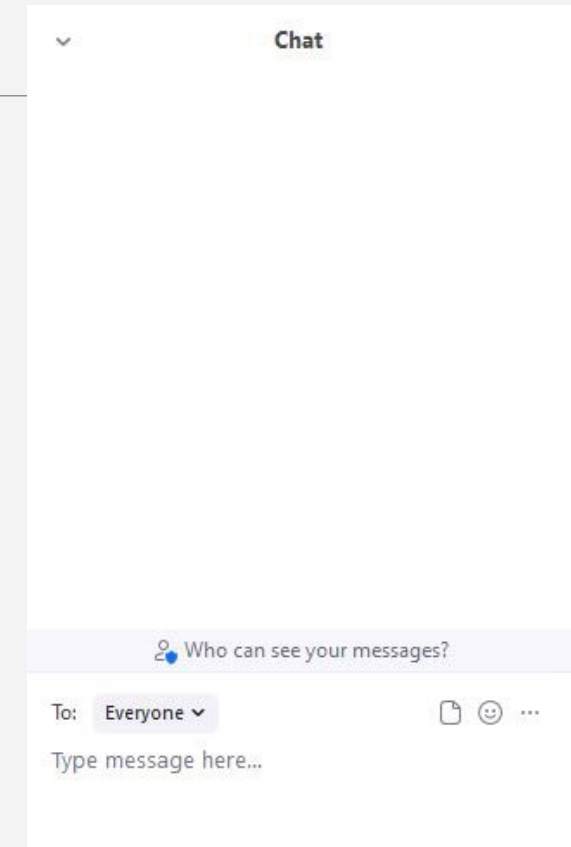
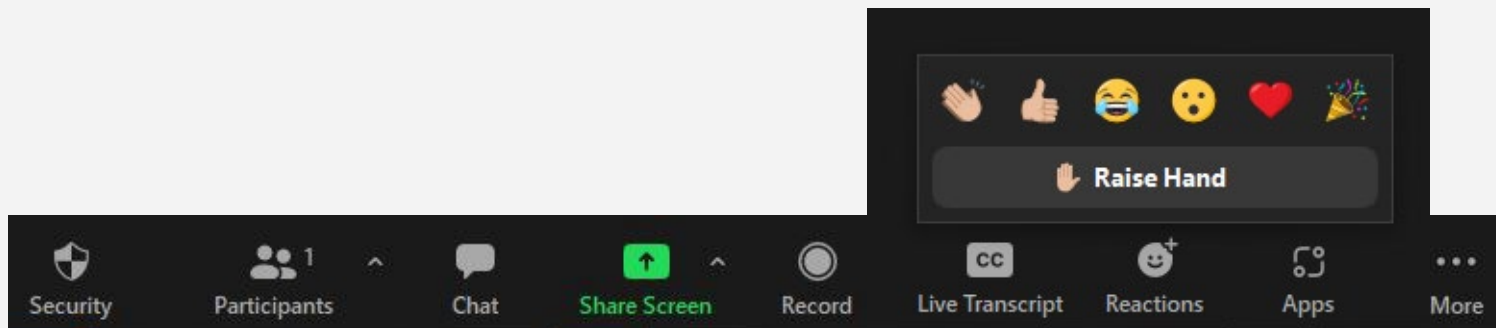
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JUNE 28 and 29, 2022



# Zoom logistics

- Send technical issues to the **host** in chat
- Send questions, comments, and discussion to **everyone** in chat
- Participants muted until we get to discussion



# Safer Products for Washington: Rulemaking Discussion

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From Ecology: Cheryl Niemi, Marissa Smith, Saskia van Bergen, Craig Manahan, Sascha Stump, Rae Eaton, Kimberly Goetz, Stacey Callaway, Lauren Tamboer, Autumn Falls, Amber Sergent.



From Health: Barb Morrissey, Elinor Fanning, Emily Horton.

# Today's schedule

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1. Safer Products for Washington program overview
2. Changes to the Final Regulatory Determinations Report
3. Where we are in the rulemaking process
4. Discuss proposed rule requirements
5. Next steps





# Section 1. Safer Products for Washington overview



# Safer Products for WA background

- Implementation program
  - Law signed in May 2019
  - Reduce toxic chemicals in consumer products
- Working to protect:
    - People
    - Sensitive populations and species
    - Our environment

# Safer Products for Washington implementation process





## Section 2. Changes to the final report





## Basis for our determinations

- Found over 70 safer, feasible, available alternatives
  - All eleven product categories
  - Some chemicals, some process changes
- All potential restrictions will reduce a significant source or use of the priority chemicals

# Changes in the Final Regulatory Determinations Report

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Chemical	Product	Draft Regulatory Action	Final Regulatory Action
Per- and polyfluoroalkyl substances (PFAS)	Leather and textile furniture and furnishings intended for outdoor use	Restriction	Notification
Organohalogen flame retardants (HFR)	Plastic external enclosures of electric and electronic products intended for outdoor use	Restriction	Notification
Polychlorinated biphenyls (PCBs)	Paints	Restriction	No action
PCBs	Printing inks	Restriction	No action

# More changes in the Final Regulatory Determinations Report

## Changes made in response to feedback:

- Clarified product categories to exclude products we didn't intend to include in scope.
- Reviewed and added more alternatives.
- Included new hazard assessments.
- Added new references.
- Reviewed the feasibility of alternatives for specific applications.
- Changed regulatory determinations.
- More clearly connected technical chapters to the supporting methods.

We'll conduct a cost assessment on the formal draft of the rule (fall 2022)

# Regulatory determinations in our final report

Chemical	Product	Final Regulatory Action
PFAS	Aftermarket stain- and water-resistance treatments	Restriction
PFAS	Carpets and rugs	Restriction
PFAS	Leather and textile furniture and furnishings intended for indoor use	Restriction
PFAS	Leather and textile furniture and furnishings intended for outdoor use	Notification
Ortho-phthalates	Fragrances in beauty products and personal care products	Restriction
Ortho-phthalates	Vinyl flooring	Restriction

# Regulatory determinations in our final report

Chemical	Product	Final Regulatory Action
HFR	Plastic external enclosures of electric and electronic products intended for indoor use	Restriction
HFR	Plastic external enclosures of electric and electronic products intended for outdoor use	Notification
HFR + organophosphate flame retardants (OPFR)	Recreational products containing polyurethane foam (covered flooring, covered mats, outdoor recreational products, and uncovered recreational products)	Restriction
HFR + OPFR	Recreational products containing polyurethane foam (covered wall padding)	Notification

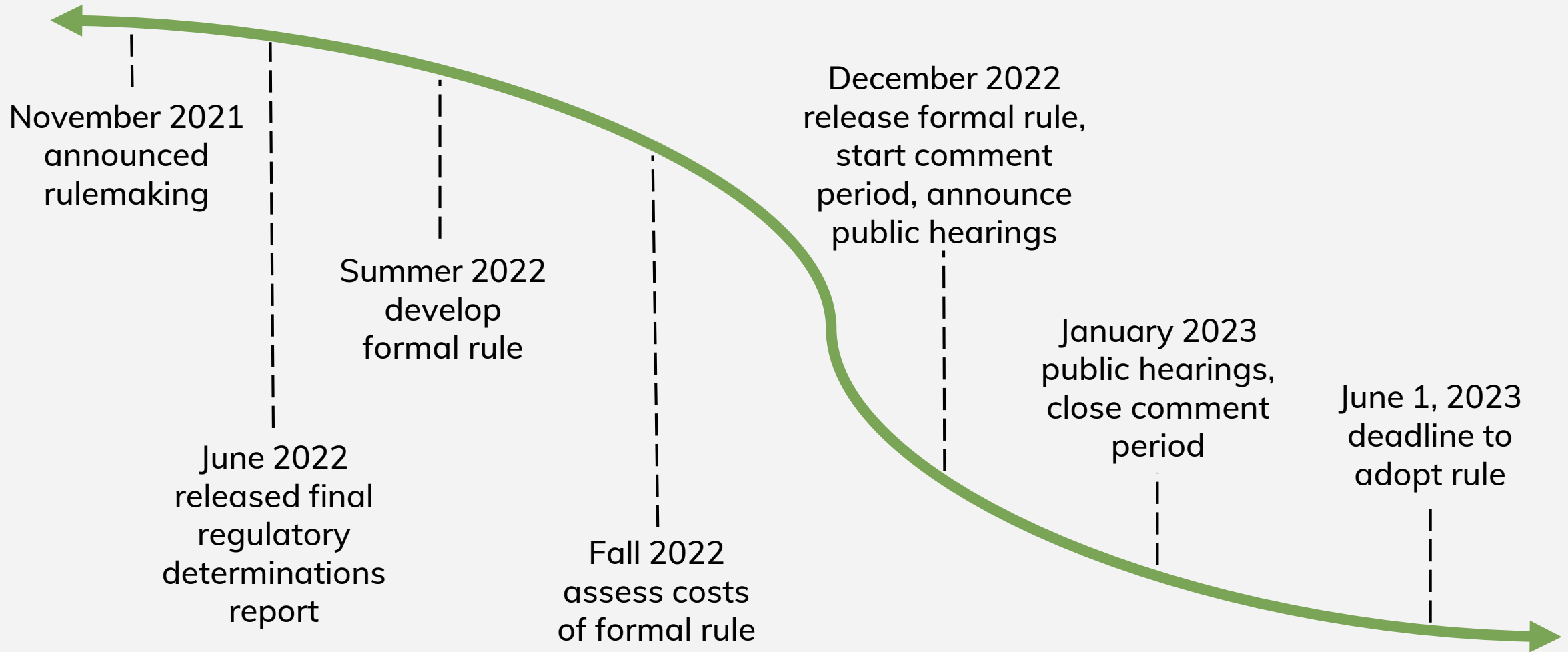
# Regulatory determinations in our final report

Chemical	Product	Final Regulatory Action
Alkylphenol ethoxylates (APEs)	Laundry detergent	Restriction
Bisphenols (excluding tetramethylbisphenol F, or TMBPF)	Drink can linings	Restriction
Bisphenols (excluding TMBPF)	Food can linings	Notification
Bisphenols	Thermal paper	Restriction
PCBs	Paints	No action
PCBs	Printing inks	No action



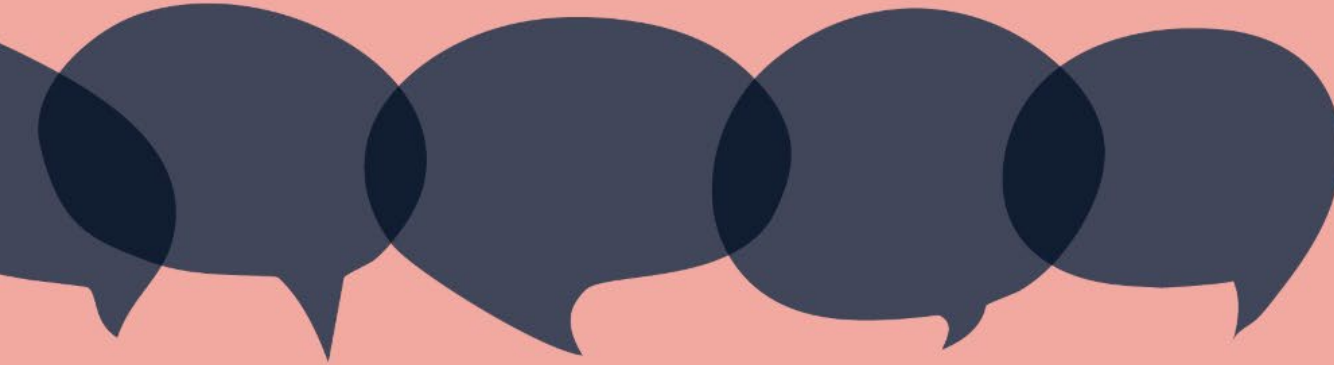
Section 3. Where we are in the rulemaking process

# Safer Products for Washington rulemaking process





# We value your feedback

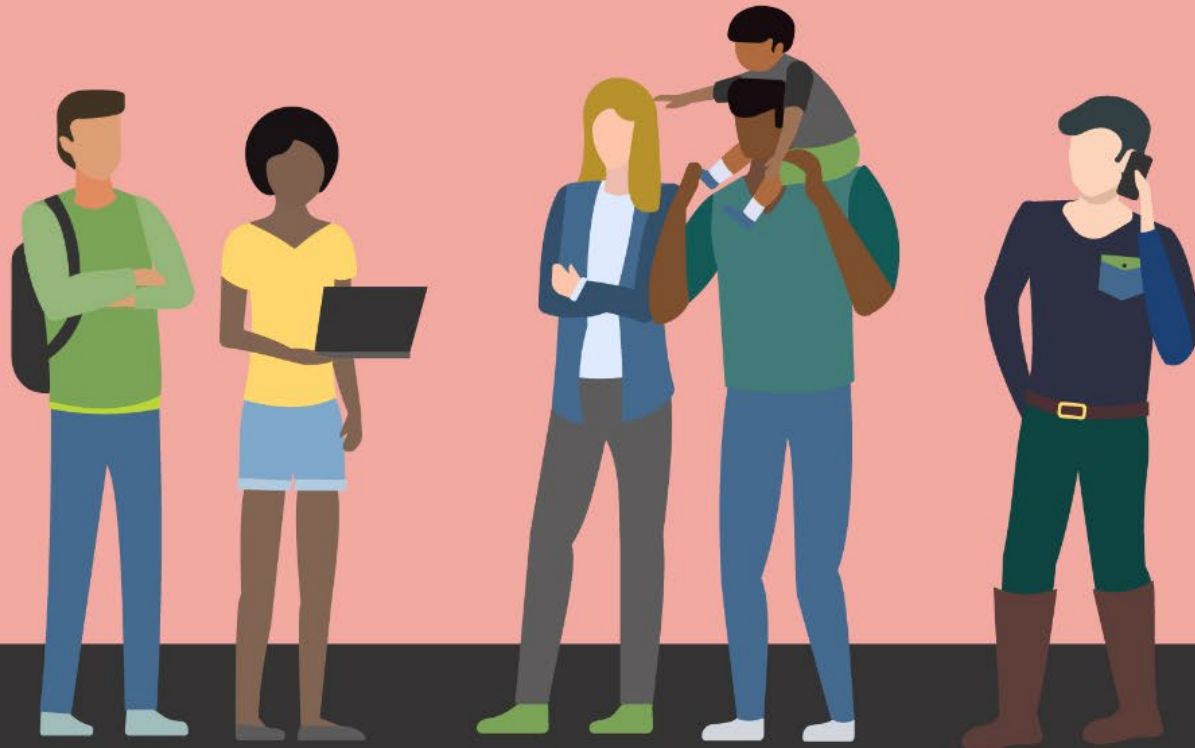


Now until fall 2022, share feedback by:

- Attending summer webinars.
- Using our online comment form.
- Emailing our team.
- Requesting a meeting with our team.

Dec. 2022 – Jan. 2023, share feedback by:

- Submitting formal comments.
- Attending public hearings.







## Section 4. Discuss proposed requirements

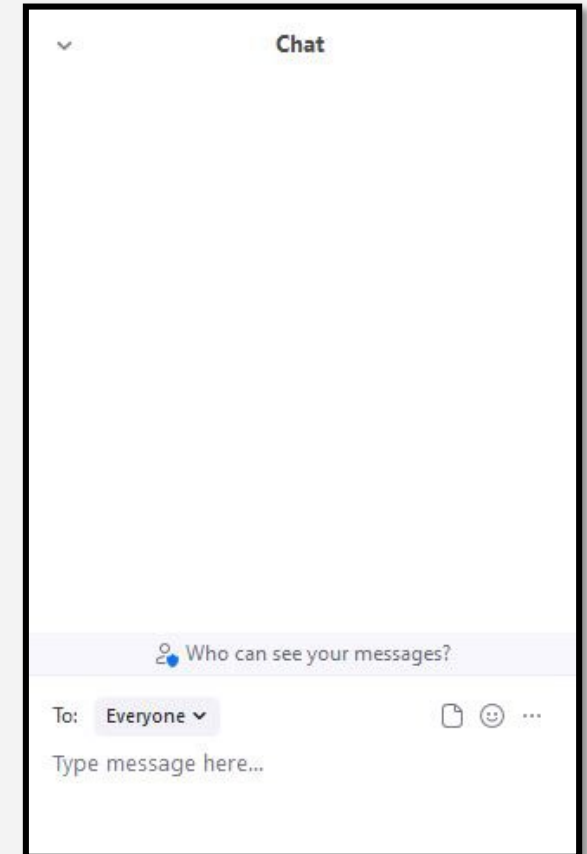
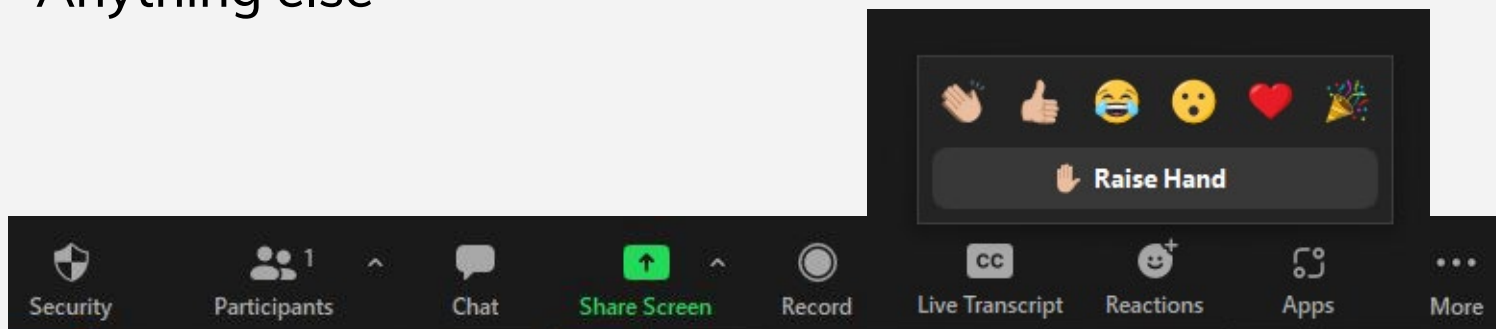
# Tell us what you think

Seeking input on:

- Restrictions and limits
- Notification requirements
- Recycled content
- Compliance schedules
- Anything else

To provide feedback:

- Type your ideas in the chat 
- Raise your hand to share verbally 



# General notification requirements

## Example notification language

The manufacturer of the following consumer product using PFAS must notify Ecology.

- Leather and textile furniture and furnishings intended for outdoor use

## Notification requirements

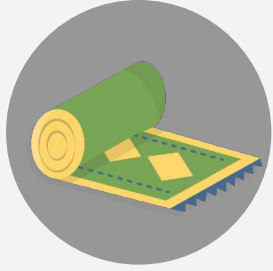
- Notify Ecology annually.
- Use the Interstate Chemicals Clearinghouse (IC2) High Priority Chemicals Data System to notify Ecology.
- Include the name of the chemical and its CAS, the product, a description of the function of the chemical, and the total concentration.

# General notification requirements

## Questions to consider today

- What do you think about the notification requirements in the Children's Safe Products Act?
- What do you think about using the IC2 database?
- How can we improve the IC2 database?





# PFAS requirements



## Example language (restriction)

Do not manufacture, sell, or distribute the following consumer products that contain PFAS.

- Aftermarket stain- and water-resistance treatments
- Carpets and rugs
- Leather and textile furniture and furnishings intended for indoor use

## Example language (notification)

The manufacturer of the following consumer product using PFAS must notify Ecology.

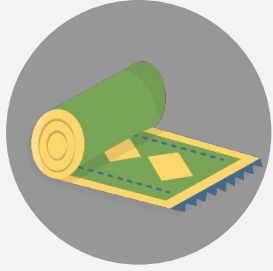
- Leather and textile furniture and furnishings intended for outdoor use

## Example language (rebuttable presumption)

Ecology presumes that the detection of total organic fluorine indicates the presence of PFAS.

Manufacturers may rebut this presumption by submitting a request to Ecology. Include the following information.

- Your name and address.
- A statement of the need for the rebuttal. Include information, data, and sources relevant to demonstrate the source of total organic fluorine is from a source other than PFAS.



# PFAS requirements—discussion



## Questions on restriction and notification

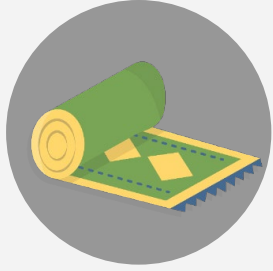
- Should this be a numeric limit instead of a restriction? Do you have data to support a numeric limit? What other limits have you seen?
- When should the restriction or limit take effect? What is feasible? What are the limitations? (may differ by product)
- If a product contains total organic fluorine and PFAS are not the source, what are other sources?
- Concerns about notification requirements?

## Questions on general requirements

- Should the rule exclude products in these categories?
- Do any products in these categories contain PFAS because they are made of recycled material?
- Do any products have replacement parts?
- We may base requirements on the manufacture date to exempt existing stock and replacement parts. What do you think about this approach? Other ideas?

## Feedback on restriction and notification

- Approach makes sense, is consistent with California and Colorado. Colorado also restricts in outdoor furniture. PFAS should not be recycled into other products. Restriction should take effect ASAP, this is a growing crisis. PFAS in breastmilk is doubling every four years. Total organic fluorine makes sense due to current method limitations. Safer alternatives exist, so the ban should be put into place, market is moving rapidly.
- Would be useful to harmonize with EU REACH or ROHS.
- There are over 12,000 PFAS on EPA list.
- Indoor/outdoor distinction raises some concerns relating to disposal of products especially in landfills, leachate can migrate into wastewater and groundwater. Concern that outdoor products will still contribute to exposure over time.
- PFAS can be used to meet insulation requirements in some products—can reduce environmental impacts of energy hungry products.



# PFAS requirements—discussion



## Questions on restriction and notification

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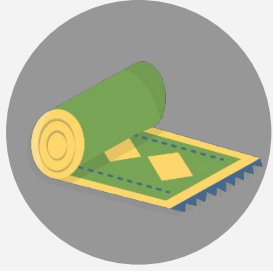
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## Feedback on restriction and notification

- Multiple lists of PFAS in U.S. and abroad, is it possible to adopt a federal list of PFAS to contain complexity for supply base?
- To note—total organic fluorine testing cannot identify individual PFAS.
- Use authority in law to gain information on chemical use in products from manufacturers, including alternatives to allow restrictions to be put in place.
- Take action on PFAS products in PFAS CAP—do not wait five years to revisit.
- Limits should be harmonized with other countries and the EU. Limits should allow measurement with usual lab equipment, not require extremely low limits, such as 1 ppm, that are impractical to measure or verify.
- Opposite opinion of above comment—methods are rapidly developing and we should not be compromising environment and human health.
- Likely contamination of new products where PFAS are not intentionally added due to persistence of PFAS in environment—important to consider.





# PFAS requirements—discussion



## Questions on restriction and notification

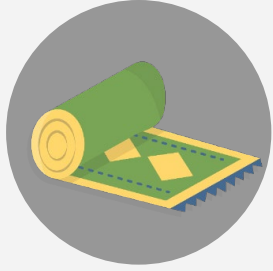
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## Feedback on restriction and notification

- Agree that testing methods are improving, but setting a limit that cannot be tested for currently does not make sense.
- Set PFAS content restriction as low as possible given background levels. Technology to test will evolve, 1 ppm PFAS is quite high.
- Responsibility should be on manufacturer to demonstrate they are not using PFAS—need to get PFAS out of the environment and current EPA levels for drinking water are extremely low. Need to get PFAS out of products to achieve.
- PFAS detection levels continue to get lower. A detection would not mean the manufacturer added the PFAS. As justification for a numeric level.
- “Shall not contain” leads to dealing with contamination. “Intentionally used” allows manufacturers to examine their supply chain. Rebuttable presumption may be helpful for this for manufacturers.



# PFAS requirements—discussion



## Questions on restriction and notification

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## Questions on general requirements

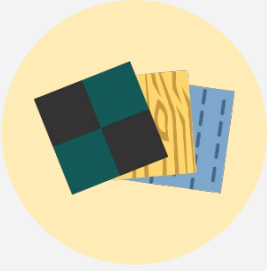
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## Feedback on general requirements

- Replacement parts should be considered as part of the product and not separately.
- Many products have safety certifications—if PFAS are restricted in these parts manufacturers will have to either recertify replacement parts or stop selling those parts.
- Replacement parts need to be carefully considered. If replacement parts are not available, it could increase disposal of products in landfills and contribute to environmental contamination.



# Ortho-phthalates requirements



## Example language (restriction)

Do not manufacture, sell, or distribute the following consumer products that contain more than 100 ppm of any individual ortho-phthalate used as solvents or fixatives for the fragrance.

- Fragrances sold separately, such as perfumes and colognes
- Fragrances used in beauty products
- Fragrances used in personal care products

## Example language (rebuttable presumption)

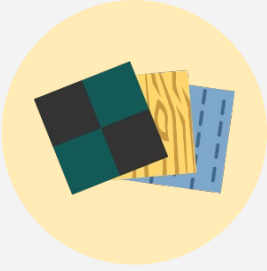
Ecology presumes that the detection of ortho-phthalates over 100 ppm in the following consumer products, where the ingredients list does not identify ortho-phthalates but does list fragrances, indicates the use of ortho-phthalates in fragrances.

- Fragrances sold separately, such as perfumes and colognes
- Fragrances used in beauty products
- Fragrances used in personal care products

Manufacturers may rebut this presumption by submitting a request to Ecology.



# Ortho-phthalates requirements



## Example language (restriction)

Do not manufacture, sell, or distribute the following consumer product that contains more than 1,000 ppm of any ortho-phthalate, individual or combined.

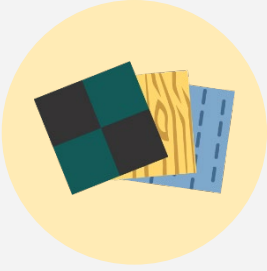
- Vinyl flooring

## Example language (rebuttable presumption)

No rebuttable presumption for this product category.



# Ortho-phthalates requirements—discussion



## Questions on restrictions

- What do you think about the proposed limits? (100 ppm for fragrances and 1,000 ppm for vinyl flooring)
- What other limits have you seen? Is 100 ppm the right concentration to identify intentional use?
- When should the limit take effect? What is feasible? What are the limitations? (may differ by product)
- What do you think about the rebuttable presumption?
- Are there other uses of phthalates that aren't identified on the ingredient list?

## Questions on general requirements

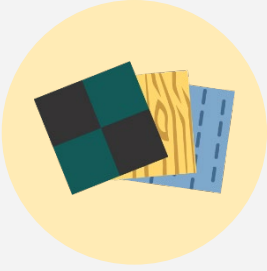
- Should the rule exclude products in these categories?
- Do any products in these categories contain ortho-phthalates because they are made of recycled material?
- We may base requirements on the manufacture date to exempt existing stock. What do you think about this approach? Other ideas?

## Feedback on restrictions

- 100ppm is high—especially for children's and teen's products. Manufacturers should need to prove phthalates are not intentionally added (in both fragrances and vinyl flooring).
- 1,000 ppm seems high for vinyl flooring.
- Toxic-Free Future study on fragrances found levels lower than 100 ppm; Ecology found levels between 10 and 200 ppm in 2014.
- Why is there a ppm limit at all rather than phthalate-free (in fragrances)?
- Should go to lowest ppm possible.



# Ortho-phthalates requirements—discussion



## Questions on restrictions

- What do you think about the proposed limits? (100 ppm for fragrances and 1,000 ppm for vinyl flooring)
- What other limits have you seen? Is 100 ppm the right concentration to identify intentional use?
- When should the limit take effect? What is feasible? What are the limitations? (may differ by product)
- What do you think about the rebuttable presumption?
- Are there other uses of phthalates that aren't identified on the ingredient list?

## Questions on general requirements

- Should the rule exclude products in these categories?
- Do any products in these categories contain ortho-phthalates because they are made of recycled material?
- We may base requirements on the manufacture date to exempt existing stock. What do you think about this approach? Other ideas?

## Feedback on general requirements

- Should be a limit on the manufacture date, some products can be on shelf a long time—should be a grace period (such as six months).
- Understood the Legislature's intent as requiring a minimum of one year to adoption to be the grace period.
- Considering five year cycle of law, manufacturers should already be moving away from priority chemicals, and there should not be a long grace period (suggests six months).
- Comment that requirement does not start until final rule is complete and Legislature included a provision for existing stock in language. For products with complex supply chains, one year may not be sufficient.



Let's take a 10 minute break



# Flame retardants requirements (scope)

Based on stakeholder feedback, we narrowed the scope for plastic external enclosures of electric and electronic products.

## Example of items **in scope**

The external housing of:

- Personal computers, laptops, monitors
- Televisions, mobile phones, adaptors
- Kitchen appliances, washing machines
- Irons, hair dryers

## Examples of items **not in scope**

- Printed circuit boards, internal fans, light bulbs
- Wires, cords, cables, switches, connectors
- Screens (but the enclosure of the screen is in scope)
- Wiring devices, control devices, electrical distribution equipment
- Lighting equipment that is hardwired into and becomes part of the fixed electrical wiring installation
- Components of electric and electronic products that are removable and replaceable, but not accessible once they're in their assembled, functional form.





# Flame retardants scope example



Example enclosure



Example product



# Flame retardants requirements (scope)—discussion

## Scope examples

### Example items in scope

- Computers, laptops, monitors, TVs, mobile phones, adaptors, kitchen appliances, washing machines, irons, hair dryers

### Example items not in scope

- Printed circuit boards, internal fans, light bulbs, wires, cords, cables, switches, connectors, screens, wiring devices, control devices, electrical distribution equipment.
- Lighting equipment that is hardwired into fixed electrical wiring installation.
- Components of electric and electronic products that are replaceable, but not accessible once assembled.

## Questions on scope

- What do you think about the items included and not included in scope?
- What should we add or remove?

## Feedback on scope

- Anything external should be included that is plastic, not only the enclosure (echoed by others).
- Examples are helpful but definition of scope is lacking—some items included might also not be commonly touched, so more clarification is needed. Some pumps are plugged in via cord, some are hardwired, so it is unclear. Definitions in scope should address what exposure is attempting to be eliminated. Defining this would help manufacturers.
- Comment that it is not only about exposure but also reducing uses.
- Reference picture on previous slide—blue plastic is what consumers touch more.
- Two applications to consider: 1) plastic box that contains electronics, under car seat, allows movement of seat, 2) flat panel TV that is mounted and consumer does not interact with due to remote. Would these be considered? Note they do not envy us trying to create a list, comments from others that these examples should be included and not be exempt.



# Flame retardants requirements (scope)—discussion

## Scope examples

### Example items in scope

- Computers, laptops, monitors, TVs, mobile phones, adaptors, kitchen appliances, washing machines, irons, hair dryers

### Example items not in scope

- Printed circuit boards, internal fans, light bulbs, wires, cords, cables, switches, connectors, screens, wiring devices, control devices, electrical distribution equipment.
- Lighting equipment that is hardwired into fixed electrical wiring installation.
- Components of electric and electronic products that are replaceable, but not accessible once assembled.

## Questions on scope

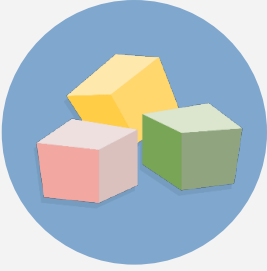
- What do you think about the items included and not included in scope?
- What should we add or remove?

## Feedback on scope

- From manufacturer perspective, would not prefer a list but rather a set of principles and guidelines for why or what is intended to be in scope, suggests a decision tree as a possible path forward.
- Box in car should be included, notes flame retardants can end up in dust, too (for example, from TV).
- Suggestion for components as “not accessible when product is being used or during operation of larger assembled product.”
- The products a consumer comes in regular contact with may be a way to consider what should be in scope. Example is a remote control. What are consumers coming into contact with (touching)?
- Positive feedback on printed circuit boards not being in scope. Continue to make clear and communicate for industry that inaccessible internal components are not in scope.
- Decision tree could be a way to help clarify what is in or out of scope.



# Flame retardants requirements



## Example language (restriction)

Do not manufacture, sell, or distribute consumer products containing more than 1,000 ppm of any organohalogen flame retardant, individually or combined.

- Plastic external enclosures of electric and electronic products intended for **indoor** use

## Note about anti-drip

- Detection of fluorine could indicate the use of a fluorinated flame retardant or the use of a fluorine based anti-drip agent.
- Fluorine based anti-drip agents are not flame retardants and are out of scope.
- Anti-drip agents are used with organophosphate flame retardants.

## Example language (rebuttable presumption)

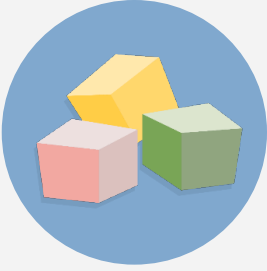
Ecology presumes that, in the specified products:

- Total bromine (Br) concentrations above 1,000 ppm indicate concentrations of organohalogen flame retardants above 1,000 ppm.
- Total chlorine (Cl) concentrations above 1,000 ppm indicate concentrations of organohalogen flame retardants above 1,000 ppm.
- Total fluorine (F) concentrations above 1,000 ppm without phosphorous indicate concentrations of organohalogen flame retardants above 1,000 ppm.

Manufacturers may rebut this presumption by submitting a request to Ecology.



# Flame retardants requirements



## Example language (restriction)

Do not manufacture, sell, or distribute consumer products listed in (A) below, that contain more than 1,000 ppm of any of the chemicals, individually or combined, listed in (B) below.

(A) Consumer products containing polyurethane foam

- Recreational covered flooring
- Recreational covered mats
- Recreational outdoor products
- Recreational products that are uncovered

(B) Chemicals

- Organohalogen flame retardants
- Ethylhexyl diphenyl phosphate (EHDPP, 1241-94-7)
- Tributyl phosphate (TNBP, 126-73-8)
- Triorthocresyl phosphate (TCP, 78-30-8)
- Triphenyl phosphate (TPP, 115-86-6)

## Example language (rebuttable presumption)

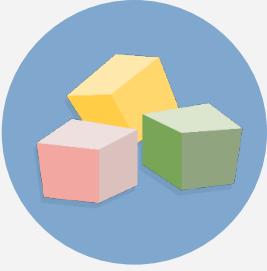
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- Total chlorine (Cl) concentrations above 1,000 ppm indicate concentrations of organohalogen flame retardants above 1,000 ppm.
- Total fluorine (F) concentrations above 1,000 ppm indicate concentrations of organohalogen flame retardants above 1,000 ppm.

Manufacturers may rebut this presumption by submitting a request to Ecology.



# Flame retardants requirements



## Example language (notification)

The manufacturer of the following consumer product that uses any organohalogen flame retardant must notify Ecology.

- Plastic external enclosures of electric and electronic products intended for outdoor use

## Example language (notification)

The manufacturer of consumer products listed in (A) below that uses any of the chemicals listed in (B) below, must notify Ecology.

(A) Consumer products containing polyurethane foam

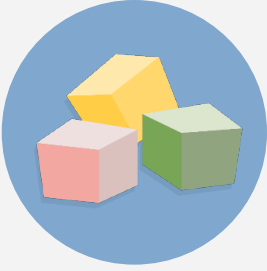
- Recreational covered wall padding

(B) Chemicals

- Organohalogen flame retardants
- Ethylhexyl diphenyl phosphate (EHDPP, 1241-94-7)
- Tributyl phosphate (TNBP, 126-73-8)
- Triorthocresyl phosphate (TCP, 78-30-8)
- Triphenyl phosphate (TPP, 115-86-6)



# Flame retardants requirements—discussion



## Questions on electric and electronic products

- What do you think about the proposed limit? (1,000 ppm HFR)
- What other limits have you seen?
- What do you think about the rebuttable presumption? Can you think of non-flame retardant sources of Br, F, Cl?
- When should the restriction or limit take effect?

## Questions on products with polyurethane foam

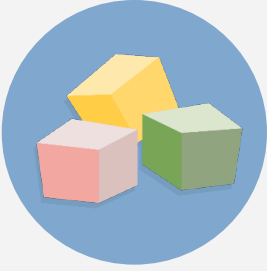
- What do you think about the proposed limit? (1,000 ppm HFR + OPFR, individually or combined)
- What other limits have you seen?
- What do you think about the rebuttable presumption? Can you think of non-flame retardant sources of Br, F, Cl?
- When should the restriction or limit take effect?

## Feedback on electric and electronic products

- Use of ‘consumer’ in the language presents the issues mentioned—many commercial and industrial products would seem out of scope based on this.
- Many substitutes are phosphorous based products, concern that these may become unavailable due to global supply—these are evolving market issues and so compliance timeframe is helpful but hard to predict future supply.
- Need to avoid use in recycled content going forward—state should consider a lower level than 1,000 ppm. Intentional use should be taken into consideration.
- State identified alternatives to HFRs ~2008, industry in Europe is moving, not much time should be allowed for compliance, should be put into effect ASAP.
- Difficult to find drop-in alternative flame retardant plastic compounds that can meet safety standards, mechanical properties, dimensions, etc. This often requires redesign of parts completely, retooling of equipment, etc. Can take time in the order of a few years.



# Flame retardants requirements—discussion



## Questions on electric and electronic products

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- What other limits have you seen?
- What do you think about the rebuttable presumption? Can you think of non-flame retardant sources of Br, F, Cl?
- When should the restriction or limit take effect?

## Feedback on electric and electronic products

- Ecodesign, EU regulation under review—take a look at where they are in that process and where they might be headed. Alignment when possible is helpful.
- Replacement parts may leverage legacy flame retardants.
- Time to restriction taking effect should be based on availability of alternatives for products.
  - Ecology encouraged manufacturers to share examples of what products do not have suitable alternatives available.
- Share economic analysis as soon as possible (comment not specific to flame retardants).





# Alkylphenol ethoxylates requirements

## Example language (restriction)

Do not manufacture, sell, or distribute the following consumer product containing more than 1,000 ppm of any alkylphenol ethoxylates, individually or combined.

- Laundry detergent



# Alkylphenol ethoxylates requirements—discussion

## Questions on restriction

- What do you think about the proposed limit? (1,000 ppm)
- What other limits for APEs have you seen?
- When should the restriction or limit take effect? What is feasible? What are the limitations?

## Questions on general requirements

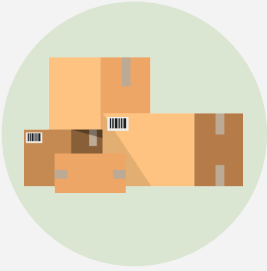
- Should the rule exclude products in these categories?
- We may base requirements on the manufacture date to exempt existing stock. What do you think about this approach? Other ideas?

## Feedback on restriction

- Comments on importance of cost analysis.
- Concerns that cost analysis needs to consider other changes being made by Ecology (such as ambient water criteria). These other impending obligations need to be considered too. Current regulatory scenario for wastewater treatment plants (WWTPs) is being updated this summer so this should be accounted for.
- Bring limits in certifications such as GreenScreen Certified into consideration.
- Additional clarity on cost analysis would be helpful—for example, how much cost difference is considered “too much.”
  - Ecology noted the economic team completes this, and will share it with stakeholders as soon as possible.
- Clarity on specific APEs included is requested.



# Bisphenols requirements



## Example language (restriction)

Do not manufacture, sell, or distribute the following consumer product containing a bisphenol-based epoxy can liner, excluding TMBPF.

- Drink can linings

## Example language (restriction)

Do not manufacture, sell, or distribute the following consumer product containing more than 200 ppm of any individual bisphenol.

- Thermal paper

## Example language (rebuttable presumption)

Ecology presumes that the detection of bisphenols indicates the use of a bisphenol-based epoxy liner.

Manufacturers may rebut this presumption by submitting a request to Ecology.

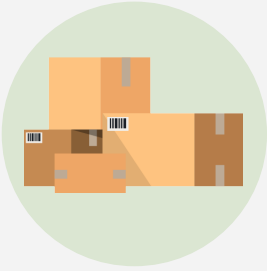
## Example language (notification)

The manufacturer of the following consumer product containing bisphenols from use of a bisphenol-based epoxy liner, excluding TMBPF-based epoxies, must notify Ecology.

- Food can linings



# Bisphenols requirements—discussion



## Questions on drink can linings

- What do you think about the proposed restriction?
- Should this be a numeric limit? Do you have data to support a numeric limit? What other limits have you seen?
- What do you think about the rebuttable presumption? What other sources of bisphenols have you seen?
- When should the restriction or limit take effect?

## Questions on thermal paper

- What do you think about the proposed limit? (200 ppm of any individual bisphenol)
- What other limits have you seen?
- When should the restriction or limit take effect?

## Questions on food can linings

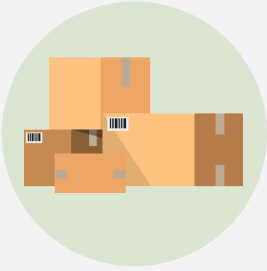
- What do you think about the notification requirement for food can linings?

## Feedback on drink can linings

- Suggest that any restriction should exclude existing stock and requirements should be phased in. Would make sense for consumers to continue to be able to purchase these up to expiration date. Does not want Washington to ask markets to dispose of food that is already on shelves.
- If TMBPF is allowed, concern this would lead to rebuttal presumption.
- Comment there is a gap in what Ecology is allowed to collect in terms of information on alternatives manufacturers are using.
- Comment that this is not a gap, and that Ecology should be able to collect this information for making determinations.
- Clarification on how rebuttable assumption would be applied would be helpful.



# Bisphenols requirements—discussion



## Questions on drink can linings

- What do you think about the proposed restriction?
- Should this be a numeric limit? Do you have data to support a numeric limit? What other limits have you seen?
- What do you think about the rebuttable presumption? What other sources of bisphenols have you seen?
- When should the restriction or limit take effect?

## Questions on thermal paper

- What do you think about the proposed limit? (200 ppm of any individual bisphenol)
- What other limits have you seen?
- When should the restriction or limit take effect?

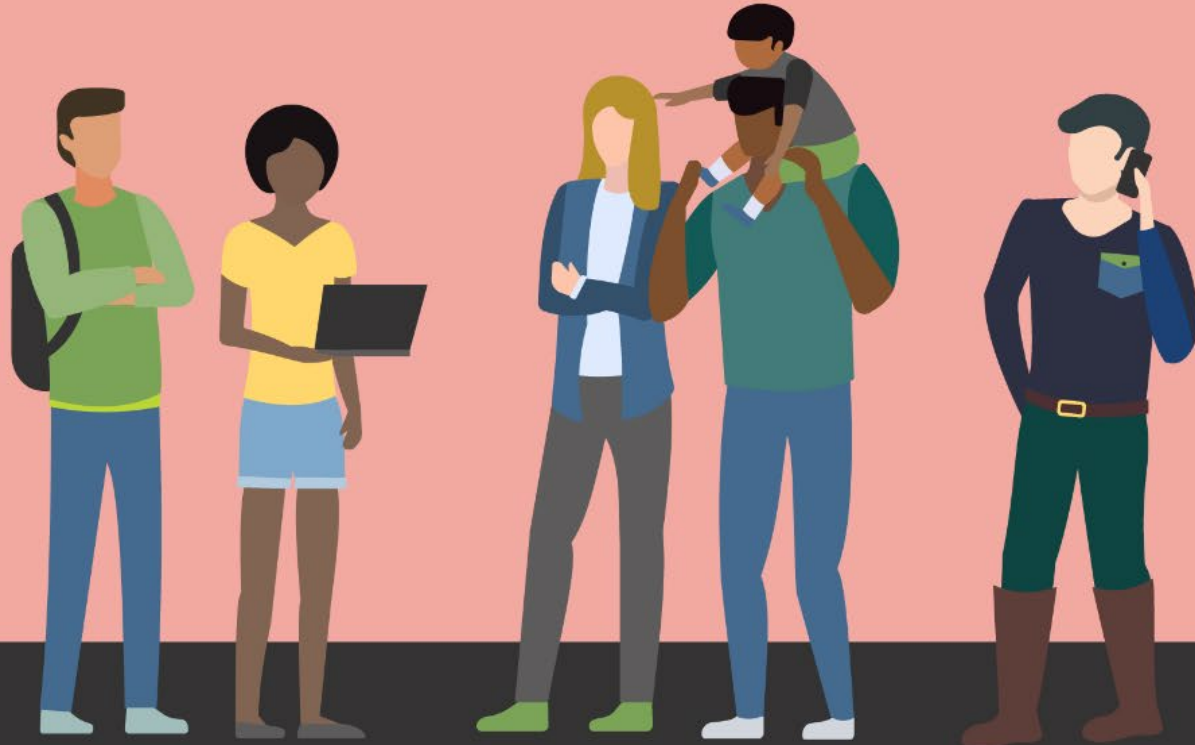
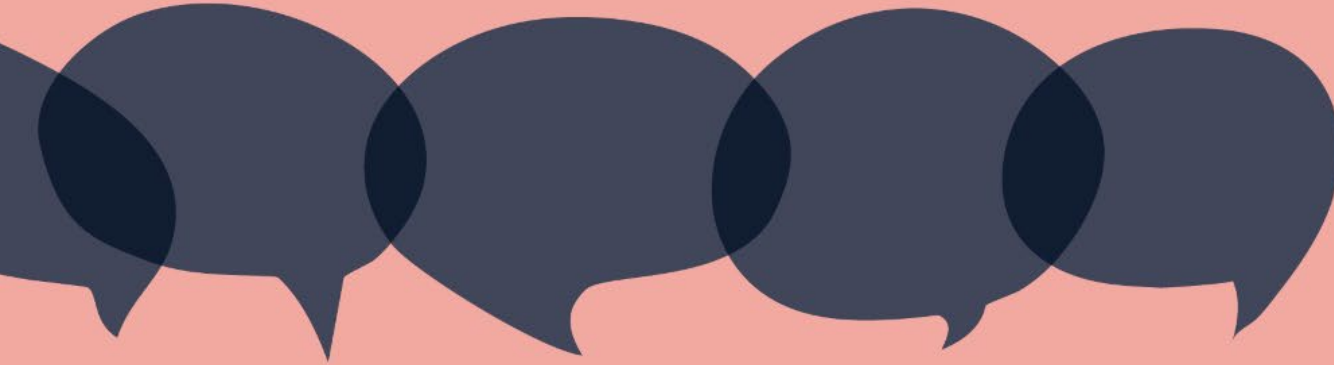
## Questions on food can linings

- What do you think about the notification requirement for food can linings?

## Feedback on food can linings

- Food can linings limits should be any level of bisphenols; concern that these will not be restricted in food can linings. Need to make progress on this application. These chemicals should not be used in food cans. Disposal exposures should be considered.
- Industry has moved away from BPA in food can linings nearly 100%. Some issues with imported cans but wanted to make this important point.

# We value your feedback



Now until fall 2022, share feedback by:

- Attending summer webinars.
- Using our online comment form.
- Emailing our team.
- Requesting a meeting with our team.

Dec. 2022 – Jan. 2023, share feedback by:

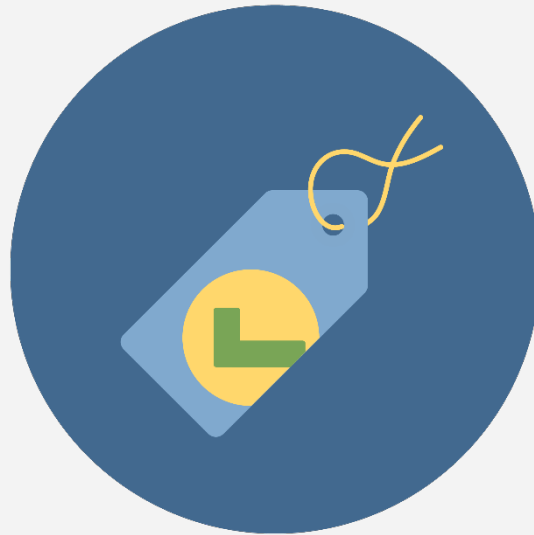
- Submitting formal comments.
- Attending public hearings.

# Thank you for joining us!

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Chapter 70A.350 RCW