



SIERRA CLUB
CALIFORNIA

May 31, 2007

Maureen Gorsen
Director, Dept. of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-0806
green.chemistry@dtsc.ca.gov

Re: RECOMMENDATIONS FOR GREEN CHEMISTRY INITIATIVE

Dear Director Gorsen:

Sierra Club California applauds the launch of the Cal-EPA "Green Chemistry Initiative," and we look forward to working with you to prevent pollution from toxic chemicals. At this initial stage, we have the following suggestions for how to best focus this important initiative:

(1) Prioritize the prevention of human health and environmental problems from consumer products. Right now, only the air board has effective authority to protect us from pollutant-containing consumer products--and this authority is relatively narrow. We need to develop a broad program for all environmental media (ecosystems and humans) and for human health (direct exposures) that is analogous to what the Air Resources Board does for air -- to identify the categories that have the greatest potential to cause harm, to prioritize them, and to systematically create ways to ensure that no harm comes from each class of products or product ingredients (ARB does both). This program should have a regulatory component.

(2) Prioritize protection of the most vulnerable people (e.g., children) and resources (e.g., endangered species, critical resources). With this approach for children as an example, the state would look to identify currently unaddressed ways children are exposed to potentially harmful substances, and seek changes (again, through regulation to ensure safeguards against toxic products, both home-grown and imported) that reduce or eliminate potentially harmful exposures. Here again, consumer products are likely to be a focus, as other types of exposures are already regulated. This would allow us to ensure that products with a lot of exposure -- from baby bottles to toys to baby food containers -- would be safe for the next generation of children.

(3) Link to already-existing environmental compliance activities; integrate with other Cal-EPA programs to identify actual sources of pollution and environmental problems and then evaluate whether a prevention answer would work. This would allow "easy fixes" to be identified and carried out to solve already identified problems. For example, this could be how to deal with the next copper-in-brake-pads problem, or consumer products with greenhouse gases, or PCBs embedded in building sealants, or plastic 6-pack rings.

4) State government should lead the way to driving demand for cleaner products through its own procurement processes; Cal-EPA should continue and enhance its collaboration with the State and Consumer Services Agency on greening the government, and should help local governments to follow.

5) Our top university programs should be tapped to provide research support; Cal-EPA should designate the Center for Occupational and Environmental Health at UC-Berkeley and UCLA as the lead entities within the UC system to address matters pertaining to chemicals policy and green chemistry in California.

Thank you for considering our views.

A handwritten signature in black ink that reads "Bill Magavern". The signature is written in a cursive, flowing style.

Bill Magavern
Senior Representative