



Three Year Priority Products Work Plan Implementation Discussion Topics

Green Ribbon Science Panel Background memo
October 20-21, 2014

This memo provides background information for the October 2014 Green Ribbon Science Panel (GRSP) meeting of the Department of Toxic Substances Control's (DTSC) Safer Consumer Products (SCP) program. This memo covers topics related to processes for implementing the three-year Priority Products Work Plan after it is finalized. Suggested questions for GRSP discussion are included.

A. Product Category Evaluation

The Chemical and Product Evaluation Team (CPET) has been actively planning to implement the three year Priority Products Work Plan. We anticipate using iterative processes to gather and review information related to product categories, chemicals, and eventually product-chemical combinations so that we can narrow our selections. We will review data and information related to the factors called out in our regulations, as well as information related to the stated priorities in the Work Plan. It is relatively straightforward to gather data related to many of the factors called out in our regulations (e.g., physicochemical properties), while other factors pose a challenge to investigate or obtain data. For example assessing aggregate effects of a chemical poses some challenges.

Questions for GRSP

Given the Work Plan's stated priorities and the prioritization factors in the SCP regulations (see addendum), what tools, approaches and data sources might we consider as we move from categories of products to Potential Priority Products? What tools and methodologies could help us compare and assess the factors to select products within a given category? Are these tools and methodologies practical?

Regulatory Prioritization Factors

- What available scientific methods can you suggest for evaluating data and information to inform our decisions around challenging factors such as aggregate effects, Candidate Chemical degradation products, and exposure potential?
- Are there data and information tools related to these factors that will be valuable as we research information to support our decisions?
- Are these tools and methods practical for department staff to use and apply?

DTSC Work Plan priorities

- What are the scientific methods you suggest for evaluating the relationship between our stated priorities and product categories, chemicals, and product-chemical combinations?
- Are there data and information tools related to our priorities that will be valuable for evaluating our options relative to the Work Plan priorities?
- Are these tools and methods practical for department staff to use and apply?

Work Plan Priorities

1. Product-chemical combinations clear pathways for dermal, ingestion or inhalation exposure
2. Chemicals found in biomonitoring studies
3. Chemicals observed in indoor air quality studies
4. Product-chemical combinations that impact sensitive subpopulations, specifically workers, children and aquatic species
5. Chemicals that have aquatic resource impacts and/or which have been observed through water quality monitoring

B. Stakeholder engagement

To date, DTSC has engaged a broad range of stakeholders, primarily through workshops, and has invited stakeholders to comment on our Initial Priority Products profiles and Work Plan. We've also met individually with many stakeholders who have approached us. Going forward, we want to strategically reach out to knowledgeable stakeholders who have valuable input and information to inform our decisions. We welcome GRSP input to help us develop our stakeholder engagement strategy for Work Plan implementation.

We want to leverage the extensive knowledge of stakeholders who have evaluated the functional performance requirements, safety, and product lifecycle of products and chemicals. We're also interested in engaging with stakeholders who have knowledge of the science behind the Work Plan priorities.

To that end, we're interested in the view "from the other side" of our process. We'd like to hear the perspective of the industry representatives on the panel. Some questions of interest are

- What types of data and information can we reasonably expect businesses to be willing to share?
- What are the barriers to information sharing?
- What can the department do to reduce these barriers?
- Should we focus efforts on industry leaders in the chemical safety space?
- What constitutes a *meaningful* market signal? Are there ways we can strengthen the market signal for the categories in the Work Plan?

Can panel members suggest other stakeholders with whom we might engage to gather information on ecological impacts of candidate chemicals? Are there stakeholder groups of whom we may not be aware with expertise in fate and transport?

We're also interested in hearing successful strategies from those who are not in industry have used to enlist support and foster meaningful engagement from private-sector stakeholders.

Addendum

SCP regulatory prioritization factors

Adverse Impacts:

1. Candidate Chemical Hazard trait and/or environmental or tox endpoints
2. Candidate Chemical aggregate effects
3. Candidate Chemical cumulative effects with other chemicals with same/similar hazard traits or env/tox endpoints
4. Candidate Chemical physicochemical properties
5. Candidate Chemical environmental fate
6. Candidate Chemical potential to contribute to or cause adverse impacts to human populations or aquatic/avian/terrestrial animal or plant organisms
7. Candidate Chemical potential to degrade, form reaction products or metabolize into another Candidate Chemical or other chemical that exhibits one or more hazard endpoints; and/or environmental or other toxicological endpoints
8. Sensitive subpopulations
9. Environmentally sensitive habitats
10. Endangered or threatened species
11. Environments in California designated as impaired
12. Adverse impacts of structurally or mechanistically similar chemicals for which there is a known profile

Exposure:

13. Market presence
14. Statewide sales by volume
15. Statewide sales by number of units
16. Intended product use/types/age groups
17. Occurrence or Potential occurrence of exposures to the CC
18. Household and workplace presence of the products and other products containing the same CC(s)
19. Potential exposures to the Candidate Chemical during the product's life cycle including
20. Manufacturing, use, storage, transportation, waste and end of life management
21. Whether the product is manufactured or stored in or transported through California solely for use outside of CA
22. Whether the product is placed....into commerce solely for the manufacture of one or more products exempted under the definition of consumer product in H&S code 25251
23. Following uses: Household and Recreational, sensitive subpopulations, workers, customers, clients, and public who use...product or release from the product in homes, schools, workplaces or other locations
24. Frequency, extent, level and duration of potential exposure for each use scenario and EOL scenario
25. Containment of Candidate Chemical within product
26. Engineering and administrative controls that reduce exposure concerns associated with the product
27. Potential for the Candidate Chemical or its degradation products to be released from, migrate from or distribute across environmental media and potential for Candidate Chemical or degradation products to accumulate and persist in biological and/or environmental compartments or systems