

## SAFER CONSUMER PRODUCTS

### PART III

- **SLATE: DTSC Guiding Principles**

#### **SOT of Debbie Raphael – DTSC Director**

When I came to the department 4 ½ months ago I sort of inherited a process that was struggling a bit. This law has been on the books for almost 3 years and the department has been working with stakeholders diligently to try and come up with a program that makes sense. What I asked the staff, what I asked the stakeholders who worked with us on this to do...is to think about 3 overarching principles. We want this program to be practical, meaningful, and legally defensible. Every decision we make, whether it's in the structure of what goes into the regulations...who is affected...the scope of what we're doing...every decision we make is looking through the prism of these 3 principles. Is it practical? Can we do it with existing resources? Do our intended audience...do the manufacturers...can they understand what we're asking of them? Do they know how to do an alternative assessment? Meaningful...if all we do is create a program that generates a bunch of paper and lots of reports that we have to go through but products don't change. Then we haven't done anything that's meaningful. What we need to do is make sure that we are pushing the envelope. That we are looking at products and chemicals that truly are impacting our health and the health of our ecosystems. Finally, legally defensible. We need to make sure that we are confident that we have the authority to take the actions that we are putting in these regulations. So that when we are challenged, and we will be challenged as we go down the line, we are confident that we have done what is in our power. What was the intention of the law and what is within our authority as an agency to put forward.

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