GRSP SC2: Tiered Alternatives Assessment
Outline of key recommendations from Conference call #1 June 2, 2011
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The objectives of creating a stepwise AA process include:

a) Streamline the analysis by identifying the most relevant factors driving the need for, and selection of, alternatives;
b) Provide a check against regrettable substitutions by addressing the full scope of impacts and considering the full product lifecyle;
c) Identify clearly preferable existing alternatives;
d) Identify data gaps;
e) Minimize the expense and time of performing basic AAs, which are required prior to making a regulatory response (expediting action on known bad-actors);
f) Enable DTSC to regulate independent of the existence of a preferable alternative;
g) Inform more extensive follow-up assessments in those situations where more information is needed or the decisions are harder.

Tier 1 Alternatives Assessment
Answer the following questions for each of the AA factors A-M. Answers should be quantitative where information is available. Where data are not available, qualitative responses with rationale should be given. Answers to the screening questions could include a conclusion of "insufficient information", with explanation of the specific knowledge gap.

1. How does this factor (A-M) relate to the reason for designation as a chemical or product of concern?

2. Is there significant variation between the chemical/product of concern and one or more of the alternatives or among alternatives under consideration? If so, to what degree does this factor (A-M) contribute to that variation?

3. From what point in the chemical or product lifecycle does impact from this factor (A-M) derive?

4. Is there a known alternative chemical, product or process that would address the risk associated with this factor (A-M)?

Notes:
This Tier 1 AA would expedite the assessment without truncating its scope, as would occur if a lower tier AA either 1) included only a subset of the factors A-M, or 2) was applied to only a portion of the lifecycle (e.g., cradle-to-gate).

The outcome of a Tier 1 AA would inform the Department's regulatory response, however most of the regulatory responses enumerated by the statute have no relationship to the availability of an alternative, and the regulatory response simply follows the AA temporally (e.g., requirements for labeling, data generation, exposure limitation, or end-of-life product management).

Where necessary, a subsequent focused follow-up assessment would provide in depth analysis of the key sources of risk identified by the Tier 1 AA (e.g., a more comprehensive assessment of public health impacts of a particular material and its alternatives, or a focused look at a particular portion of the product lifecycle). This could inform subsequent regulatory responses. For example, a Tier 1 AA could identify the need for end-of-life management, and this action would be required on the basis of the Tier 1 AA. The

ultimate and preferred action would be to substitute a safer alternative, should one exist; that substitution would be informed by a focused follow-up assessment.