



January 28, 2022

Cheryl Niemi
Hazardous Waste and Toxics Reduction Program, Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7696

Re: Support for Safer Products for Washington Draft Report to the Legislature on Regulatory Determinations

Dear Cheryl Niemi:

PCC Community Markets (PCC) is writing to express our support for the draft regulatory determinations that will help protect Washington State residents from toxic chemicals in consumer products.

PCC is the nation's largest community-owned food market, with over 100,000 active members, 16 stores across the Puget Sound region and over \$400 million in sales. PCC's vision is to inspire and advance the health and well-being of people, their communities and our planet. It is our mission to ensure that good food nourishes the communities we serve while cultivating vibrant local, organic food systems. A critical part of PCC's work is to advocate for the policies that can help further this vision and mission.

Beyond our commitment to organic food, PCC recognizes the importance of minimizing exposure to toxic chemicals and has taken a number of steps to protect our workers and our shoppers—from building green stores with less toxic materials to prohibiting over 500 harmful chemicals in the personal care products we sell. Additionally, in 2014, we eliminated all bisphenols from our thermal tape receipts. PCC has also advocated for the restriction of toxic chemicals to protect not just people, but all species that come into contact with the water, soil, and air these chemicals may contaminate.

While PCC can take certain steps to control the products on our shelves or the building materials we use, we firmly believe that all people should be protected from exposure to toxic chemicals in their work environment and homes. There is no replacement for regulatory action and legislation that protects everyone.

PCC generally supports the proposed restrictions and disclosure requirements for the priority chemicals and products outlined in the draft report to the legislature. Specifically, we offer the following observations:

- We appreciate the approach of not only identifying safer alternatives to classes of chemicals, but also restricting unsafe chemicals when they may not actually be necessary in a priority product. We also thank the Program's acknowledgement and consideration towards issues of equity regarding exposure to toxic chemicals.
- In the report, it is noted that no alternative food can linings were identified to replace bisphenols because manufacturers refused to share current products or alternatives in use based on claims of confidential business information. We support the Department of Ecology (DOE)'s recommendation for a reporting requirement on bisphenols in food can linings. We would also encourage, however, DOE to consider a stronger mandate on sharing of alternatives to benefit the public health.
- PCC would also encourage DOE to reevaluate the options for thermal paper, as it appears only one chemical, Pergafast 201™, was examined. PCC uses phenol-free thermal tapes from Iconex and previously has used thermal paper coated with ascorbic acid (vitamin C) as the developer. We suggest that the DOE evaluate additional substances or provide greater transparency on why such alternatives, if evaluated initially, were

rejected as viable options. We would also recommend caution regarding the suggestion of e-receipts being a replacement for printed thermal paper receipts, because not everyone has equal access to technology, such as email addresses, computers, or reliable internet.

Lastly, PCC would like to thank DOE for continuing to move forward on the work to identify priority chemicals and products, and issue the first draft restrictions report, despite the challenges and stresses of the ongoing COVID-19 pandemic. While COVID-19 is an immediate and serious public health threat, exposure to toxic chemicals has been a chronic and ongoing threat as well, and PCC appreciates the Department's prioritization of this work.

Thank you for your continued dedication to our state and making it a safer place for our residents.

Sincerely,

Rebecca E. Robinson, M.A.

Senior Product Sustainability Specialist
PCC Community Markets

Aimee Simpson, J.D.

Director of Advocacy & Product Sustainability
PCC Community Markets