Draft Toxics Reduction Strategies Framework – 10/12/2012

- Problem description
  - Description of where toxics are in the environment and people, and risks:
    1. Known risks and toxic effects
    2. Risks related to unknowns and lack of information; sometimes we know the chemicals are out there but we don't know what they're doing to people or the environment
  - Description of flaws/gaps in the system with examples:
    1. Addressing toxics "downstream" rather than further up the lifecycle is less efficient. (E.g., PCBs in the Spokane River / Inland Paper.)
    2. Duwamish "early action" ($20M in studies to confirm 12M in actions).
    3. Release of chemicals from consumer products into the environment is a real problem and a source of new contamination and recontamination at cleanup sites.
    4. Even though we are taking action to address individual chemicals or individual products or classes of products, and are succeeding in those actions, the magnitude of the number of chemicals in commerce and number of products means that we are falling farther and farther behind. (E.g., BPA may be out of most baby bottles but it is still in cash register receipts.)
    5. Other examples
  - What else?

- Principles
  - The problem of toxics is a shared problem and solving it is a shared responsibility.
  - Government has some responsibilities; producers, manufacturers, and consumers also have some responsibility. (What is the proper role for government in this area?)
  - It cheaper, more efficient, and safer to use a less toxic or non-toxic alternative – to work towards detoxification of products and systems – rather than to address toxics through regulation of waste streams, or once they're already released to the environment, or affecting people.
  - Chemicals should be safe for their intended use; people should be able to rely on this. Producers have a responsibility for providing enough information so that safety can be demonstrated. (How do we reconcile the idea of more information with the need maintain trade secrets, particularly when those are needed to spur innovation?)
  - Lifecycle environmental costs should be internalized, and the responsibility for the costs of toxics should be shared by producers, manufacturers, and consumers.
  - We cannot do everything at once, so we should address the most pressing problems first.
  - The unknowns and complexities in understanding chemical exposures and responses warrant a precautionary approach; however, caution should not inhibit innovation.
  - What else?

- Strategies/Tactics
  - Focus on what the state can do and implement here; the problem is much broader but there will be important things we can do in Washington State. We cannot wait for the national system to be reformed before acting.
  - Shift actions up into the supply chains and farther back in the lifecycle of materials; look for leverage points that will influence behavior at those levels.

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- Use a liability approach to make producers/manufacturers responsible for toxics in products. For example, they could be required to fix or take a product back if it is determined to contain toxics, similar to how product recalls for other safety risks work now.
- Make connections between the people who make decisions about chemicals in commerce (e.g., producers, manufacturers, consumers) and the responsibility for problems toxics can cause in people and the environment; currently these connections can be lacking (e.g., Inland Paper situation).
- Minimize transaction costs and work to use performance standards and other incentives/leverage points to move quickly to implementation where goals are clear (e.g., the straight to implementation approach; early cleanup actions).
- Provide quality, timely, and understandable information to consumers to support informed choices and influence market; education is key.
- Looking across chemicals and potential exposures, identify and prioritize chemicals of concern and address the most problematic chemicals and exposures first.
- Encourage and support the design of safer and more sustainable chemicals, processes, and products through research, education, recognition, incentives, and other means. Set standards that will inspire and motivate engineers and scientists of the future to develop better alternatives. (This encompasses ideas about green chemistry, design for the environment, benign design, cradle to cradle design, etc.)
- What else?

- <u>Possible Actions</u>
  - Your ideas here!

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