

August 18, 2009

Dear Mr. Movassaghi,

Thank you for taking the time to meet with us today. Below is a short list of our coalition's concerns on the new direction the implementing regulations of AB 1879 have taken from your Department.

Consistent with the letters of input that CHANGE and its members have provided throughout the development of California's Green Chemistry Initiative, CHANGE finds the following elements of the recent version of the regulations problematic. These bullet points are further elaborated upon in our previous letters of input.

- 1) Alternatives Analysis done by industry. A third party certifier, paid for by a fund will help lessen bias information.
- 2) The switch from chemical-based regulations to product-based regulations.
- 3) The Self-Implementing nature of the regulations and implementation. We believe that Industry can't be responsible for whether or not their products advance in the process without any oversight.
- 4) The lack of a safety standard.
- 5) The lack of a Mandatory Data Set.
- 6) The responsibility is downstream, at the retailer level. Changes need to happen further up the product chain, at the manufacturer level.
- 7) Chemical of concern definition. This should rely upon existing authoritative bodies.
- 8) Reliance upon risk assessment.

Asian Communities for
Reproductive Justice

Black Women for
Wellness

Breast Cancer Action

Breast Cancer Fund

Californians for Pesticide
Reform

California Healthy Nail
Salon Collaborative

California Pan-Ethnic
Health Network

Center for Environmental
Health

Clean Water Action

Coalition for Clean Air

Commonweal

Communities for a Better
Environment

Environment California

Environmental and Public
Health Consulting

Green Schools Initiative

Healthy 880 Communities

Healthy Children
Organizing Project

Interfaith Partnership for
Children's health and the
Environment

Just Transition Alliance

Movement Strategy
Center

Pesticide Action Network
North America

Physicians for Social
Responsibility- Los
Angeles

Science Environmental
Health Network

Silicon Valley Toxics
Coalition

Worksafe

CHANGE (Californians for a Healthy & Green Economy) is a growing coalition of environmental health, policy, labor, environmental justice, interfaith, and other organizations who are working to create a better system for regulating toxic chemicals in California.

www.changecalifornia.org