

June 1, 2009

Mr. Maziar Movassaghi
Acting Director
California Department of Toxic Substances Control
P.O. Box 806
Sacramento, CA 95812-2828

Dear Mr. Movassaghi,

We would like to congratulate you and DTSC on your work in advancing the California Green Chemistry Initiative. We are hopeful that the Initiative will meet what it has set out to achieve, and we would like to offer our support in this effort.

We are a group of downstream users of chemicals in products -- companies, health care organizations and non-governmental organizations (NGOs) -- who are very interested in the success of the California Green Chemistry Initiative. We are writing to provide input and to request a meeting to further discuss our ideas.

Downstream businesses, consumers, investors and governments need chemicals and products that have low to no toxicity and degrade into innocuous substances in the environment. But the current lack of data on both chemical ingredients in products and the hazardous properties of these chemicals makes it extremely difficult to meet this need. In many cases, we are unable to identify the chemicals in products, their hazard traits and whether safer chemicals are on the market. We believe this in turn presents a serious market barrier to the development of safer chemicals and products based on the principles of green chemistry.

Our mission, as participants in the Business-NGO Working Group, is "To promote the creation and adoption of safer chemicals and sustainable materials in a way that supports market transitions to a healthy economy, healthy environment, and healthy people". To implement our mission the Working Group developed the Guiding Principles for Chemicals Policy -- which are attached and listed briefly below:

1. Know and disclose product chemistry.
2. Assess and avoid hazards.
3. Commit to continuous improvement.
4. Support public policies and industry standards to advance the implementation of the above three principles.

Specifically, mechanisms are needed to better identify:

1. The chemical constituents in products. The need for more transparency in the product supply chain is captured by the California Green Chemistry Initiative Report's Policy Recommendation #3 - create an online product ingredient network.
2. The inherent hazards of chemicals in products. This supports implementing the California Green Chemistry Initiative Report's Policy Recommendation #4 - to create an online product ingredient network.
3. The availability of safer alternatives to chemicals of high concern. We need a credible, transparent source of information. This supports the California Green Chemistry Initiative Report's Policy Recommendation #5 - to accelerate the quest for safer products.

For further details on each of these points, see the attached Business-NGO Working Group "Memo on the California Green Chemistry Program and the Critical Needs of Downstream Users."

We look forward to working with you in making the Green Chemistry Initiative a success. Participants in the Business-NGO Working Group who are actively engaged in chemicals policy include:

- Adam Lowry, Chief Greenskeeper, Co-Founder, Method
- Anna Gilmore Hall, Executive Director, Health Care Without Harm
- Dave Rapaport, Senior Director, Corporate Consciousness, Seventh Generation
- Davis Baltz, Special Projects Advisor, Environmental Health, Commonweal
- Gina Pugliese, Vice President, Premier Safety Institute, Premier, Inc.
- Howard Williams, Vice President, Construction Specialties, Inc.
- Jeanne Rizzo, President and CEO, Breast Cancer Fund
- Kathy Gerwig, Vice President, Workplace Safety and Environmental Stewardship Officer, Kaiser Permanente
- Lee Kane, EcoCzar/Forager, Whole Foods Market
- Mark Buckley, Vice President Environmental Affairs, Staples, Inc.
- Mark Rossi, Research Director, Clean Production Action
- Rachelle Wenger, Director, Public Policy and Community Advocacy, Catholic Healthcare West
- Tom Lent, Policy Director, Healthy Building Network
- Tracey Easthope, Director of the Environmental Health Project, Ecology Center

As chair of the Business-NGO Working Group, I will be in touch to organize a time to further discuss these considerations. Also feel free to contact me with any questions or clarifications. Please note that we are also in the process of writing comments to the DTSC's "Draft Straw Proposal" (Version 5.1 04-23-2009) and will forward them to you shortly.

Sincerely,



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Joe Simitian, California State Senator
Linda S. Adams, Secretary, California Environmental Protection Agency
Mark Leno, California State Senator
Mike Feuer, California State Assembly Member
Wesley Chesbro, California State Assembly Member

Attachments:

- Business-NGO Guiding Principles for Chemicals Policy
- Business-NGO Memo on the California Green Chemistry Program and the Critical Needs of Downstream Users