



# Identification of Priority Chemicals Report to the Legislature

## Safer Products for Washington Cycle 2 Implementation Phase 1

**Hazardous Waste and Toxics Reduction**

Washington State Department of Ecology

Olympia, Washington

May 2024, Publication 24-04-025

# Publication Information

This document is available on the Department of Ecology's website at:  
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## Related information

1. Safer Products for Washington Cycle 2 Implementation Phase 1: [Technical Supporting Documentation for Priority Chemicals](#)<sup>1</sup>
2. Safer Products for Washington Cycle 1 Implementation Phase 2: [Report to the Legislature on Priority Consumer Products](#)<sup>2</sup>
3. Safer Products for Washington Cycle 1 Implementation Phase 3: [Final Report to the Legislature on Regulatory Determinations](#)<sup>3</sup>
4. Safer Products for Washington Cycle 1 Implementation Phase 4:
  - [Chapter 173-337-WAC—Safer Products Restriction and Reporting](#)<sup>4</sup>
  - [Concise Explanatory Statement](#)<sup>5</sup>

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<sup>1</sup> [apps.ecology.wa.gov/publications/summarypages/2404026.html](https://apps.ecology.wa.gov/publications/summarypages/2404026.html)

<sup>2</sup> [apps.ecology.wa.gov/publications/summarypages/2004019.html](https://apps.ecology.wa.gov/publications/summarypages/2004019.html)

<sup>3</sup> [apps.ecology.wa.gov/publications/SummaryPages/2204018.html](https://apps.ecology.wa.gov/publications/SummaryPages/2204018.html)

<sup>4</sup> [app.leg.wa.gov/WAC/default.aspx?cite=173-337](http://app.leg.wa.gov/WAC/default.aspx?cite=173-337)

<sup>5</sup> [apps.ecology.wa.gov/publications/summarypages/2304033.html](https://apps.ecology.wa.gov/publications/summarypages/2304033.html)

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<sup>7</sup> [www.ecology.wa.gov/accessibility](http://www.ecology.wa.gov/accessibility)

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Hazardous Waste and Toxics Reduction Program  
Washington State Department of Ecology  
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DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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# Executive Summary

In 2019, the Washington State Legislature directed Washington Department of Ecology (Ecology), in consultation with Washington Department of Health (Health) (jointly “we”), to implement a regulatory program to reduce toxic chemicals in consumer products (Chapter [70A.350 RCW](#)<sup>8</sup>). The implementation program is called Safer Products for Washington.

## Legislative directive

RCW 70A.350.020 requires Ecology, in consultation with Health, to identify priority chemicals or chemical classes:

“Every five years, and consistent with the timeline established in RCW 70A.350.050, the department, in consultation with the department of health, must report to the appropriate committees of the legislature its decision to designate at least five priority chemicals that meet at least one of the following:

- (1) The chemical or a member of a class of chemicals are identified by the department as a:
  - (a) High priority chemical of high concern for children under chapter [70A.430 RCW](#),<sup>9</sup> or
  - (b) Persistent, bioaccumulative toxin under chapter [70A.300 RCW](#),<sup>10</sup>
- (2) The chemical or members of a class of chemicals are regulated:
  - (a) In consumer products under chapter 70A.430, [70A.405](#),<sup>11</sup> [70A.222](#),<sup>12</sup> [70A.335](#),<sup>13</sup> 70A.430, [70A.230](#),<sup>14</sup> or [70A.400 RCW](#),<sup>15</sup> or
  - (b) As a hazardous substance under chapter 70A.300 or [70A.305 RCW](#),<sup>16</sup> or
- (3) The department determines the chemical or members of a class of chemicals are a concern for sensitive populations and sensitive species after considering the following factors:
  - (a) A chemical’s or members of a class of chemicals’ hazard traits or environmental or toxicological endpoints;

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<sup>8</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.350](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.350)

<sup>9</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.430](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.430)

<sup>10</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.300](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.300)

<sup>11</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.405](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.405)

<sup>12</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.222](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.222)

<sup>13</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.335](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.335)

<sup>14</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.230](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.230)

<sup>15</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.400](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.400)

<sup>16</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.305](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.305)



- (b) A chemical's or members of a class of chemicals' aggregate effects;
- (c) A chemical's or members of a class of chemicals' cumulative effects with other chemicals with the same or similar hazard traits or environmental or toxicological endpoints;
- (d) A chemical or members of a class of chemicals' environmental fate;
- (e) The potential for a chemical or member of a class of chemicals to degrade, form reaction products, or metabolize into another chemical or a chemical that exhibits one or more hazard traits or environmental or toxicological endpoints, or both;
- (f) The potential for the chemical or class of chemicals to contribute to or cause adverse health or environmental impacts;
- (g) The chemical's or class of chemicals' potential impact on sensitive populations, sensitive species, or environmentally sensitive habitats;
- (h) Potential exposures to the chemical or members of a class of chemicals based on:
  - (i) Reliable information regarding potential exposures to the chemical or members of a class of chemicals; and
  - (ii) Reliable information demonstrating occurrence, or potential occurrence, of multiple exposures to the chemical or members of a class of chemicals."

## Identification of priority chemicals

Safer Products for Washington is implemented through a four-phase cycle that repeats every five years. This report identifies priority chemicals and chemical classes for the first phase of the second cycle of Safer Products for Washington implementation. To identify priority chemicals, we used a transparent approach that is grounded in science and public input. Our goals were to center our work around equitably reducing exposure to toxic chemicals and to demonstrate the priority chemicals selected meet the criteria in the law.

We evaluated potential priority chemicals and classes against the law's criteria by reviewing existing regulations, peer-reviewed science, government reports, and other scientific evidence. Based on this review, we identified seven chemical classes to be priority chemicals under the statute, as required by RCW 70A.350.020:

- Cadmium and cadmium compounds
- Lead and lead compounds
- Organobromine and/or organochlorine substances
- Benzene, ethyl benzene, toluene, and xylene substances (BTEX)

- Formaldehyde and formaldehyde releasers
- Cyclic volatile methylsiloxanes (cVMS)
- 6PPD

The [Technical Supporting Documentation for Priority Chemicals: Safer Products for Washington Cycle 2 Implementation Phase 1 report](#)<sup>17</sup> supports these determinations.

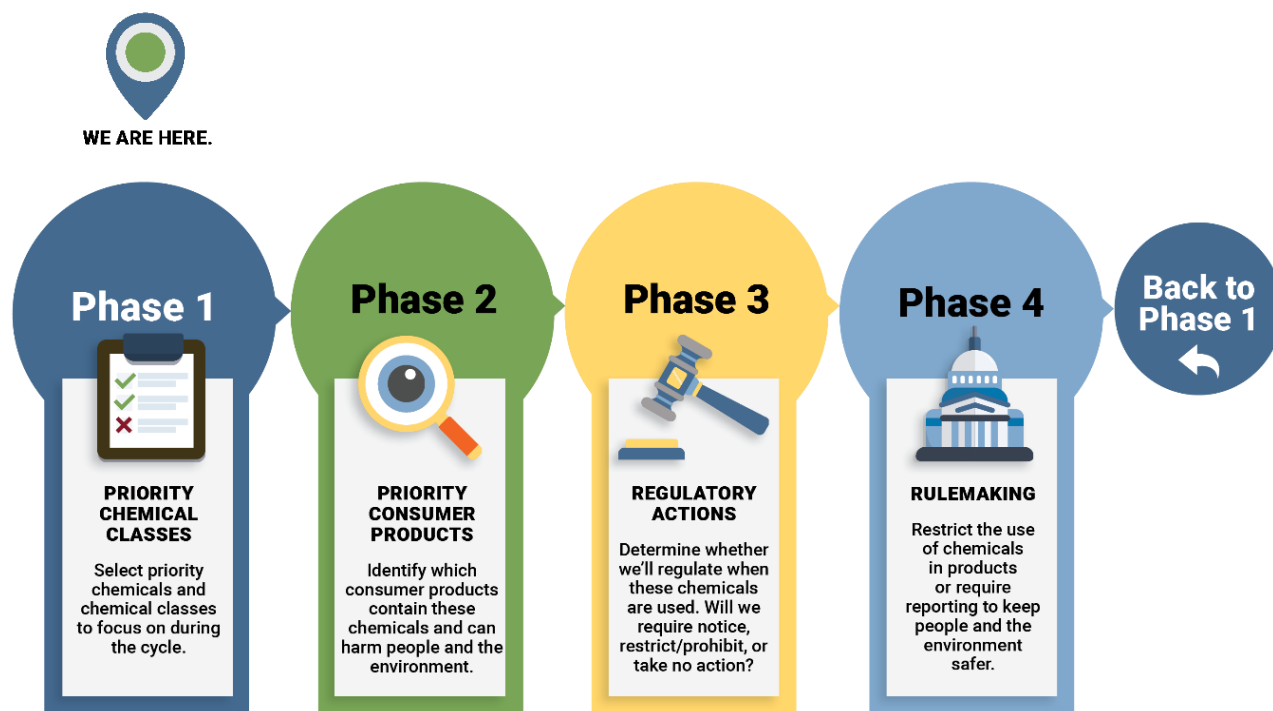
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<sup>17</sup> [apps.ecology.wa.gov/publications/summarypages/2404026.html](https://apps.ecology.wa.gov/publications/summarypages/2404026.html)

# Designation of Priority Chemicals

In 2019, the Washington State Legislature directed Washington Department of Ecology, in consultation with Washington Department of Health, to implement a regulatory program to reduce toxic chemicals in consumer products (Chapter [70A.350 RCW](#)).<sup>18</sup> The implementation program is called Safer Products for Washington.

Safer Products for Washington is a four-phase process that repeats every five years (Figure 1). During the first cycle of Safer Products for Washington, we focused on priority chemical classes identified in the statute. We identified eleven categories of priority consumer products that were significant sources or uses of the priority chemical classes in the statute. After evaluating the feasibility and availability of safer alternatives, we made regulatory determinations and developed rules for those regulatory determinations through rulemaking.



**Figure 1. The four phases of a Safer Products for Washington implementation cycle.**

In the second cycle of Safer Products for Washington, we will focus on the new priority chemical classes described in this phase 1 report, as well as the priority chemical classes listed in RCW 70A.350.010(12).

In phase 2 we will narrow our focus to priority products that are significant sources or uses of the priority chemical classes identified in this report and in RCW 70A.350.010(12). We plan to

<sup>18</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.350](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.350)

release our draft priority products report for public comment in summer 2024, and the final report to the legislature in January 2025.

In phase 3 we will determine whether safer alternatives are feasible and available and make regulatory determinations. We plan to release our draft regulatory determinations report for public comment in summer 2026, and the final report to the legislature in January 2027.

Lastly, we will conduct rulemaking to develop rules for the regulatory determinations. We must adopt rules by June 2028.

Cycle 2 of Safer Products for Washington is implemented at the same time as other cycles. Two notable ongoing efforts are:

- Ongoing compliance support for cycle 1 rules adopted on May 31, 2023 (Chapter [173-337 WAC](#)<sup>19</sup>).
- Regulatory determinations for PFAS in products identified in our Chemical Action Plan due June 1, 2024.

## Legislative directive

RCW 70A.350.020 requires priority chemicals or classes meet at least one of the following criteria:

- The chemical or a member of the chemical class is a chemical of high concern to children or a persistent, bioaccumulative, and toxic chemical.
- The chemical or members of the chemical class are regulated in consumer products sold in Washington or as a hazardous substance.
- The chemical or members of the class of chemicals are a concern for sensitive populations and sensitive species.

This report explains our process fulfilling these requirements. It describes the hazards of each priority chemical class, the potential for reducing exposures and promoting equity, and how each chemical class meets the criteria in the statute. This report does not propose or establish regulations or restrictions on these chemical classes.

## Overview of the prioritization process

Safer Products for Washington follows a hazard-based approach for reducing sources and uses of hazardous chemicals. We identify hazardous chemicals, along with their sources and uses, and then we determine if it is feasible to reduce or prevent their use.

This approach is fundamentally different from a risk assessment, which focuses on quantifying the level of exposure and hazard, and then determining the likelihood of an adverse impact.

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<sup>19</sup> [app.leg.wa.gov/WAC/default.aspx?cite=173-337](http://app.leg.wa.gov/WAC/default.aspx?cite=173-337)

There are often unknown hazards and exposures that can lead to underestimating risk. A more prudent and protective approach is to avoid the use of hazardous chemicals when safer alternatives are feasible and available. This prevents pollution across the lifecycle of consumer products. That is why this report focuses on identifying priority chemical classes based on their hazards and potential for exposure, instead of assessing risk.

There are an estimated 42,000 chemicals in use in commerce today.<sup>20</sup> To identify the classes of chemicals considered for Safer Products for Washington cycle 2, we needed to prioritize possible selections. The goals of the prioritization process were to:

- Use a transparent approach that is grounded in science and public input for our identification of priority chemicals.
- Equitably reduce exposure to toxic chemicals.
- Show that the priority chemicals selected meet the law's criteria.

We conducted a bilingual (Spanish and English) multimedia survey of people who live and work in Washington. The survey ran between November 2021 and January 2022. We received [nearly 400 responses](#)<sup>21</sup> and used these results to inform our research. As part of the survey, respondents identified products they were concerned might contain toxic chemicals.

Focusing on products mentioned in the survey responses, we used peer-reviewed literature, authoritative sources, and predictive models and tools to identify chemical ingredients. We screened these chemicals for known and potential hazards.

We took steps to make our public process accessible to anyone who wanted to participate. People often know what products they use but rarely have access to chemical ingredients or hazards. If we had asked people to prioritize chemicals of concern, they might not have had access to the information needed to respond. However, because people shared what products they use or are concerned about, we were able to do the scientific research to determine what chemicals are in those products and whether the chemicals are associated with potential hazards. From this work, we generated a list of potentially hazardous chemicals found in products identified in our public survey.

We additionally reviewed biomonitoring data, occupational exposure data, and product use data to identify chemicals that have higher exposure in some populations and included existing priorities from research at Health and Ecology. From this work, we generated an additional list of chemicals that we added to the list generated from our public survey.

Finally, we narrowed the list of chemicals by deprioritizing those with existing effective regulatory structures and prioritizing those with potential for:

- Equitably reducing exposure

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<sup>20</sup> [www.epa.gov/tsca-inventory/how-access-tsca-inventory](http://www.epa.gov/tsca-inventory/how-access-tsca-inventory)

<sup>21</sup> [www.ezview.wa.gov/Portals/\\_1962/Documents/saferproducts/2022\\_CompleteSurveyResponses.pdf](http://www.ezview.wa.gov/Portals/_1962/Documents/saferproducts/2022_CompleteSurveyResponses.pdf)

- Preventing regrettable substitutions
- Reducing environmental persistence
- Reducing carcinogens, mutagens, reproductive and developmental toxicants, and endocrine disruptors
- Reducing production and release volumes

## Overview of the evaluation criteria

[RCW 70A.350.020](#)<sup>22</sup> requires priority chemicals or classes to meet at least one of three criteria:

- The chemical or a member of the chemical class is identified as either a chemical of high concern to children or as a persistent, bioaccumulative, and toxic chemical.
- The chemical or a member of the chemical class is regulated in consumer products sold in Washington or as a hazardous substance.
- The chemical or a member of the class of chemicals is a concern for sensitive populations and sensitive species.

We evaluated potential priority chemicals and classes against the criteria in the law by reviewing existing regulations, peer-reviewed science, government reports, and other scientific evidence.

## New priority chemicals

Table 1 below identifies seven new priority chemical classes that we have not previously addressed under Chapter [70A.350 RCW](#).<sup>23</sup> It describes the priority chemical class and the criteria in RCW 70A.350.020 that are applicable to each class.

**Table 1. Priority chemical classes and statutory criteria met.**

Priority chemical or chemical class	Statutory criteria met
<b>Cadmium and cadmium compounds</b>	Chemical of high concern to children Hazardous substance in Washington Regulated in consumer products under relevant Washington statutes Concern for sensitive species and populations
<b>Lead and lead compounds</b>	Hazardous substance in Washington Regulated in consumer products under relevant Washington statutes Concern for sensitive species and populations

<sup>22</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.350.020](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.350.020)

<sup>23</sup> [app.leg.wa.gov/RCW/default.aspx?cite=70A.350](http://app.leg.wa.gov/RCW/default.aspx?cite=70A.350)

Priority chemical or chemical class	Statutory criteria met
<b>Organobromine and/or organochlorine substances</b>	Chemical of high concern to children Hazardous substance in Washington Chemical listed as persistent, bioaccumulative, and toxic (PBT) Regulated in consumer products under relevant Washington statutes Concern for sensitive species and populations
<b>Benzene, ethyl benzene, toluene, and xylene substances (BTEX)</b>	Chemical of high concern to children Hazardous substance in Washington Concern for sensitive species and populations
<b>Formaldehyde and formaldehyde releasers</b>	Chemical of high concern to children Hazardous substance in Washington Concern for sensitive species and populations
<b>Cyclic volatile methylsiloxanes (cVMS)</b>	Concern for sensitive species and populations
<b>6PPD</b>	Hazardous substance in Washington Concern for sensitive species and populations

In addition to meeting the statutory criteria for selection as priority chemicals, the chemical classes identified in this report are associated with disproportionate exposures and environmental contamination. Reducing sources and uses of these chemicals will help reduce disproportionate exposures and promote equity. By avoiding the use of these chemicals in the first place, we avoid the need to mitigate or clean them up in the environment.

## Reducing disproportionate exposures

Each of the chemical classes we identified in this report has the potential to reduce disproportionate exposures and promote health equity (Table 2). Exposures to these chemicals from consumer products occur in addition to exposures from other sources, such as:

- Drinking water
- Food
- House dust
- Indoor and outdoor air
- Soil
- Recreational waters

People are not exposed equally to toxic chemicals. Exposures are indicative of where people live, where they work, what they eat and drink, and the kinds of consumer products they

purchase and use. The impacts of exposures come from chemicals people are currently exposed to as well as those that accumulate in their bodies throughout their lives. Inadequate diets in low-income communities may also increase absorption of chemicals, such as lead and cadmium. Exposures to the priority chemical classes identified in this report can disproportionately affect sensitive populations including people with occupational exposures, low-income communities, immigrant communities, and people of color.

Consumer products contribute to disproportionate exposures to the priority chemical classes identified in this report in sensitive populations. Examples described in the [Technical Supporting Documentation for Priority Chemicals: Safer Products for Washington Cycle 2 Implementation Phase 1 report](#)<sup>24</sup> include:

- Lead can be a contaminant in metal products, such as jewelry and cookware, and can disproportionately expose people using those products.
- Formaldehyde, formaldehyde releasers, and cVMS are used in products that are often marketed towards people of color, such as hair smoothing and hair straightening products.
- People living in manufactured homes, working with building products, or frequently using cleaning products may have higher exposure to formaldehyde and other respiratory irritants.
- Workers using cleaning and degreasing agents, construction workers, and nail salon workers may have higher exposures to BTEX substances and some organobromine and/or organochlorine substances that are present in products used in these occupations.

Children are particularly sensitive to the impacts from toxic chemicals. Children are often exposed to these priority chemicals in the womb and from breast milk. Since they spend more time on and near the floor, they tend to ingest more house dust, which often contains chemicals from consumer products. Additionally, hand-to-mouth activity and mouthing consumer products can increase ingestion of potentially toxic chemicals.

Reducing sources and uses of the priority chemical identified in this report will help reduce exposures that are disproportionately high in sensitive populations.

## Preventing environmental releases

Reducing uses and releases of priority chemicals identified in this report can also reduce environmental contamination. The cheapest and most effective way to reduce environmental contamination is to avoid it in the first place.

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<sup>24</sup> [apps.ecology.wa.gov/publications/summarypages/2404026.html](https://apps.ecology.wa.gov/publications/summarypages/2404026.html)



Many of the priority chemical classes identified in this report have members that are already national cleanup priorities including:

- Lead and lead compounds
- Cadmium and cadmium compounds
- Organobromine and/or organochlorine substances
- BTEX substances
- Formaldehyde and formaldehyde releases

Other chemical classes identified in this report are widely detected in the environment and have fate and toxicity concerns.

cVMS released in the environment are persistent, build up in the tissues of living organisms, and capable of spreading long distances, so they can impact geographic regions far from where they are initially released.

Another example is 6PPD, which is a chemical of emerging concern. 6PPD released from rubber products transforms to 6PPD-quinone, which is highly toxic to salmon and has caused pre-spawn mortality in salmon populations in Washington State. Salmon are important to Washington culturally, economically, and ecologically. The impacts of salmon loss disproportionately affect Tribal populations. Reducing the use of 6PPD is critical to protecting salmon populations.

## Priority chemical evaluation

For each of the priority chemicals identified, we determined whether they were associated with any of the following:

- Carcinogenicity, having the ability to cause cancer
- Mutagenicity, having the ability to cause genetic mutations
- Toxicity, being poisonous or having the ability to damage an organism following short or long-term exposures
- Reproductive toxicity, having the ability to interfere with mating and fertility
- Developmental toxicity, having the ability to interfere with normal development or cause developmental malformation
- Neurotoxicity, having the ability to cause adverse function or structural change in the nervous system
- Systemic toxicity, having the ability to cause adverse effects on one or more organs, such as the kidney or liver
- Endocrine activity, having the ability to affect or interfere with normal hormone actions

- Skin sensitization, having the ability to cause an allergic response or hypersensitivity (such as eczema) in susceptible individuals
- Respiratory sensitization, having the ability to cause an allergic reaction or hypersensitivity (such as asthma) in the respiratory system

We identified hazards in Table 2 as a concern if they were present in at least one member of the chemical class. Not all chemicals within the class have all hazards listed. The [Technical Supporting Documentation for Priority Chemicals: Safer Products for Washington Cycle 2 Implementation Phase 1 report](#)<sup>25</sup> contains more information about the chemical hazards, exposure potential, and how we evaluated them against the criteria in the statute.

**Table 2. Human and environmental health concerns and exposure in sensitive populations and species for priority chemicals and classes.**

Chemical or class	Human health concerns	Ecological concerns	Persistence and Bioaccumulation	Exposure concerns
<b>Cadmium and cadmium compounds</b>	Carcinogenicity, mutagenicity, reproductive toxicity, developmental toxicity, systemic toxicity	Aquatic toxicity (impacts on salmon)	Persistence	Washingtonians have higher exposure than the national average, exposures in children, present in the environment above environmental limits
<b>Lead and lead compounds</b>	Carcinogenicity, mutagenicity, reproductive toxicity, developmental toxicity, endocrine activity, neurotoxicity	Endocrine activity, aquatic toxicity	Persistence, bioaccumulation	Exposures in children, occupational exposures, environmental contamination

<sup>25</sup> [apps.ecology.wa.gov/publications/summarypages/2404026.html](https://apps.ecology.wa.gov/publications/summarypages/2404026.html)

Chemical or class	Human health concerns	Ecological concerns	Persistence and Bioaccumulation	Exposure concerns
<b>Organobromine and/or organochlorine substances</b>	Carcinogenicity, mutagenicity, reproductive toxicity, developmental toxicity, systemic toxicity, neurotoxicity	Aquatic toxicity	Persistence, bioaccumulation	Occupational exposures, exposures in children, impacts on communities living near contaminated sites, environmental contamination
<b>Benzene, ethyl benzene, toluene, and xylene substances (BTEX)</b>	Carcinogenicity, mutagenicity, developmental toxicity, neurotoxicity	Aquatic toxicity	Not persistent or bioaccumulative	Occupational exposures, exposures in children, impacts on communities living near contaminated sites, environmental contamination
<b>Formaldehyde and formaldehyde releasers</b>	Carcinogenicity, mutagenicity, skin sensitization, respiratory sensitization	Aquatic toxicity	Not persistent or bioaccumulative but have toxic breakdown products (formaldehyde)	Occupational exposures, exposures in children, potentially higher exposure in women of color, air quality contaminant
<b>Cyclic volatile methylsiloxanes</b>	Reproductive toxicity, endocrine activity	Endocrine activity, aquatic toxicity	Persistence, bioaccumulation	Occupational exposures, potentially higher exposure in women of color, potential for long range transport, environmental contamination

Chemical or class	Human health concerns	Ecological concerns	Persistence and Bioaccumulation	Exposure concerns
6PPD	Reproductive toxicity, skin sensitization	Aquatic toxicity (impacts on salmon)	Persistence, bioaccumulation, and toxic breakdown products	Found in salmon-bearing streams in Washington, potentially disproportionate impacts of salmon loss, emerging concerns for human health

We based on our review of priority chemicals on biomonitoring data, occupational exposure data, environmental monitoring data, existing hazard assessments, predictive models and tools, and peer-reviewed literature. A detailed citation list is attached as Appendix A, we made the following determinations:

## Cadmium and cadmium compounds

We selected cadmium and cadmium compounds as priority chemicals for this cycle of Safer Products for Washington because they are associated with concerning human and environmental hazards, such as cancer, harm to reproduction and development, and aquatic toxicity. Washingtonians have higher exposure to cadmium than the national average. Cadmium has been detected in Washington’s waters, sediment, and air, with some samples exceeding environmental limits. Because cadmium is toxic to salmon, these exposures may be impacting sensitive species. Regulations on cadmium in children’s products demonstrate that reducing cadmium levels in some consumer products is possible.

## Lead and lead compounds

We selected lead and lead compounds as priority chemicals for this cycle of Safer Products for Washington because they are widely detected in the environment and people’s bodies, and they can have damaging impacts on children’s development. There is no safe level of lead exposure for children. Race, income, and other sociodemographic factors are associated with disproportionate exposures. Because lead is already regulated in some consumer products, it could be feasible to reduce exposures from other products and ultimately reduce the disproportionate impacts of lead on sensitive populations, such as children.

## Organobromine and/or organochlorine substances

We selected organobromine and/or organochlorine substances as priority chemicals for this cycle of Safer Products for Washington because they can cause cancer, are toxic for reproduction and development, and are toxic to fish. Organobromine and/or organochlorine

substances have been detected in air, drinking water, house dust, groundwater, soil, and sediment. They have also been detected in people and sensitive species. People who work where organobromine and/or organochlorine substances are used may have disproportionately higher exposure. According to EPA, many organobromine and/or organochlorine substances are high production volume chemicals. Due to similarities in their molecular structures, these chemicals have often been regrettable substitutes for one another in consumer products.

## **BTEX Substances**

BTEX substances were selected as priority chemicals for this cycle of Safer Products for Washington because exposures can lead to adverse developmental impacts and impair brain function. Exposure to BTEX substances is widespread, however, people working in certain professions may have disproportionately higher exposure. For example, workers in occupations where BTEX are used as degreasers, paint thinners, brush cleaners, adhesives, inks, and coatings may have higher exposure. People working in construction jobs, auto shops, and nail salons might have higher exposure to BTEX substances. These occupational trends can lead to disproportionate exposures by race, ethnicity, or income.

## **Formaldehyde and Formaldehyde Releasers**

Formaldehyde and formaldehyde releasers were selected for this round of priority chemicals under Safer Products for Washington because formaldehyde can cause cancer and is a sensitizer with prevalent exposure in people and the environment. Formaldehyde can be associated with disproportionate exposures, particularly when used in cosmetic products marketed toward women of color. Formaldehyde exposure can also be higher in people living in manufactured homes or working with building products containing formaldehyde. Reducing sources and uses of formaldehyde and formaldehyde releasers can reduce disproportionate exposures to a known human carcinogen and sensitizer.

## **Cyclic Volatile Methylsiloxanes (cVMS)**

cVMS were selected as priority chemicals for this cycle of Safer Products for Washington because they are persistent, likely accumulate in people and wildlife, and are toxic chemicals. They have high production volumes, potential disproportionate exposures, and hazards that can impact sensitive species and populations. cVMS might also be associated with disproportionate exposure because they are used in haircare products marketed toward women of color. Exposures are a concern for sensitive species and populations because cVMS are associated with reproductive and developmental impacts, endocrine disruption, and aquatic toxicity.

## **6PPD**

6PPD was selected as a priority chemical under Safer Products for Washington because 6PPD—and its transformation product 6PPD-q—are highly toxic to salmon and likely to other aquatic species. Human health concerns over 6PPD are emerging, and exposure is expected to be widespread. 6PPD is a high production volume chemical. 6PPD is added to tires to help them

last longer, but is released to the environment as tires wear on roadways. Salmon exposures happen when small tire particles are washed into nearby waterways.

Salmon are an important species for Washington State culturally, economically, and ecologically. 6PPD-q has been shown to kill salmon at extremely low concentrations. Concentrations of 6PPD-q above those known to kill salmon have been measured in Washington State roadway runoff. Reducing sources and uses of 6PPD in Washington is important for protecting aquatic life and particularly critical for salmon because they only reproduce after they return to freshwater.

## Additional technical information

We provide extensive detail for our process and decision-making in a separate document. Our [Technical Supporting Documentation for Priority Chemicals: Safer Products for Washington Cycle 2 Implementation Phase 1 report](#)<sup>26</sup> provides an overview of each priority chemical, our detailed rationale for choosing the chemical, the hazards and potential exposures related to the chemical, and details on the scientific data, peer-reviewed studies, and other supporting documentation for our decisions.

## Existing priority chemicals identified in the statute

As we identify priority products during the second implementation cycle, we will continue to consider the priority chemical classes identified in the statute. The existing priority chemicals are described in Table 3. As in Table 2, the endpoints described in Table 3 were identified as a concern if they were present in at least one member of the chemical class. Not all chemicals within the class have all hazards listed.

**Table 33. Priority chemicals identified in the statute and their human health and ecological concerns and persistence and bioaccumulation.**

Priority chemical class	Human health concerns	Ecological concerns	Persistence and bioaccumulation
<b>Per- and polyfluoroalkyl substances</b>	Carcinogenicity, reproductive and developmental toxicity, systemic toxicity	Aquatic toxicity	Persistence, bioaccumulation
<b>Ortho-phthalates</b>	Carcinogenicity, reproductive and developmental toxicity, endocrine activity	Endocrine activity, aquatic toxicity	Not persistent or bioaccumulative

<sup>26</sup> [apps.ecology.wa.gov/publications/summarypages/2404026.html](https://apps.ecology.wa.gov/publications/summarypages/2404026.html)

Priority chemical class	Human health concerns	Ecological concerns	Persistence and bioaccumulation
<b>Organohalogen flame retardants</b>	Carcinogenicity, reproductive and developmental toxicity	Aquatic toxicity	Persistence, bioaccumulation
<b>Organophosphate flame retardants Triphenyl phosphate (TPP), Tri-n-butyl phosphate (TNBP), Ethylhexyl diphenyl phosphate (EHDPP), Tricresyl phosphate (TCP), Isopropylated triphenyl phosphate (IPTPP)</b>	Reproductive toxicity, neurotoxicity, systemic toxicity	Aquatic toxicity	Bioaccumulation
<b>Polychlorinated biphenyls</b>	Carcinogenicity, developmental toxicity	Aquatic toxicity	Persistence and bioaccumulation
<b>Bisphenols</b>	Developmental toxicity, reproductive toxicity, endocrine activity	Endocrine activity, aquatic toxicity	Persistence
<b>Alkylphenol ethoxylates</b>	Endocrine activity	Endocrine activity, aquatic toxicity	Persistence

## Summary and draft schedule

If the 2025 Legislature does not direct Ecology otherwise, we will focus our Safer Products for Washington efforts on the priority chemical classes described in Tables 2 and 3 of this report. In phase 2, we will narrow our focus to priority products that are significant sources or uses of the priority chemical classes identified in this report. Should the 2025 Legislature make changes to the chemicals identified in Table 2, Ecology will alter our product scope accordingly.

We plan to release our draft priority products report for public comment in summer 2024, and the final report to the legislature in June 2025. Any proposed restrictions will be issued for public comment in 2026 with final regulations adopted by June 2027.

# Appendix A. Citation List

## Overview

The following citation list was developed to meet the requirements outlined in [RCW 70A.350.050](#)<sup>27</sup> and [RCW 34.05.272](#).<sup>28</sup> It identifies the peer-reviewed science, studies, reports, and other sources of information used to support our identification of priority chemicals. The following are the types of sources used to support this report:

1. Peer review is overseen by an independent third party.
2. Review is by staff internal to Ecology.
3. Review by persons that are external to and selected by Ecology.
4. Documented open public review process that is not limited to invited organizations or individuals.
5. Federal and state statutes.
6. Court and hearings board decisions.
7. Federal and state administrative rules and regulations.
8. Policy and regulatory documents adopted by local governments.
9. Data from primary research, monitoring activities, or other sources, but that has not been incorporated as part of documents reviewed under other processes.
10. Records of best professional judgment of Ecology employees or other individuals.
11. Sources of information that do not fit into one of the other categories listed.

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**Table 44. References, categorized by source type.**

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<sup>27</sup> [app.leg.wa.gov/rcw/default.aspx?cite=70A.350.050](http://app.leg.wa.gov/rcw/default.aspx?cite=70A.350.050)

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