



ELEMENTS OF A SUCCESSFUL GREEN CHEMISTRY PROGRAM

1. Create a program that is commensurate with the problem. Such a program would include a large and comprehensive list of chemicals of concern based on authoritative bodies as well as chemicals for which there is no or limited data. In addition, the state should have a process whereby the public can petition for chemicals to be added to the list of chemicals of concern. A proper program would have multiple points of entry (chemical, product or chemical function) and would include emerging technologies such as nanotechnology.
2. Prioritization based on hazard and exposure-- especially exposure to vulnerable populations including workers, fence-line communities, immune-compromised individuals, infants, children, the elderly and pregnant women—and prioritization based on linkage to known environmental and human health problems.
3. Institute strong DTSC oversight with state agencies identifying and prioritizing chemicals of concern as well as assigning the appropriate regulatory response, based on a chemical's ability to cause harm. The program cannot be self-implementing. Regulatory responses must be sufficient to protect vulnerable populations as identified above and meet environmental standards. In areas of uncertainty, the burden of proof must be on manufacturers rather than on government or the public. When a safer alternative is found, DTSC must mandate the phase out of the chemical of concern for that use.
4. Realize cost savings through establishing a fast-track for high hazard chemicals. Alternatives assessments should be tiered to allow for flexibility and to avoid paralysis by analysis.
5. Institute strong and reliable data requirements, including both hazard information and ingredient information that will be shared publicly and with limited allowance for trade secret claims. Any information that would be used to determine the safety of a particular chemical or product should not be considered a trade secret.
6. Manufacturers of chemicals of concern must adequately fund the program to ensure compliance, provide oversight and create a certification process for third parties to conduct publicly available alternatives assessments.