

Design for the Environment

Background

In October 2010, EPA's Design for the Environment (DfE) program requested comments on revisions to its Standard for Safer Cleaning Products (“Standard”), which establishes the minimum requirements for identifying products that satisfy DfE’s safer product criteria. The DfE program was started over 15 years ago to work in partnership with diverse entities from industry, environmental groups, and academia to reduce risk to people and the environment “by finding ways to prevent pollution.” The DfE program works through partnerships with these entities to select safer chemicals and technologies through an evaluation process that assesses products, manufacturing processes, or businesses for human health concerns, environmental considerations, and performance and cost of traditional and alternative technologies. Recent DfE efforts have focused on helping consumers and industrial purchasers make more informed choices by identifying safe and effective products. The program has evaluated and allowed more than 1,500 products to carry the DfE logo based on the Agency’s conclusion that they reduce the use of chemicals of concern.

Update

On December 31, 2010, CPDA submitted comments on the Standard. Although CPDA would not typically submit comments on a standard for cleaning products, we were concerned about EPA’s inclusion of references to endocrine disrupting chemicals in several sections of the standard. The Agency’s Endocrine Disruptor Screening Program (EDSP) is just getting started, and there is significant controversy about the suitability and reliability of some of the screening assays as well as the unknown procedures that will be used to evaluate the assay results. Therefore, CPDA submitted comments* to request that chemicals not be evaluated in the DfE assessment process based partially on the fact that they appear on a list of chemicals to be screened for their potential to be endocrine disruptors. In particular, we pointed out that under the EDSP, EPA has repeatedly stated that “the public should not presume that the listing of a chemical or substance indicates in any way that EPA currently suspects that such a chemical or substance interferes with the endocrine system in humans or other species....” Therefore, CPDA asked EPA to clarify that substances on current lists of chemicals for initial screening purposes in the EDSP would not be included in certain assessment criteria/requirements of the standard unless they have been found to be endocrine disruptors.

*CPDA submitted almost identical comments on January 31, 2011 for the same type of references to endocrine disruptors in DfE’s proposed revisions to the Alternatives Assessment document that is used to make detailed product comparisons of potential human health and environmental impacts in the Alternatives Assessment Program.