



November 16, 2015

Barbara Lee  
Director  
Department of Toxic Substances Control  
CalEPA  
1001 "I" Street  
Sacramento, California 95814

Re: Comments Concerning the Draft Stage 1 Alternatives Analysis Guide  
Submitted via Calsafer.dtsc.gov

Dear Director Lee:

On behalf of the International Fragrance Association North America (IFRA North America) and its members, we appreciate the opportunity to comment on the Department of Toxic Substances Control's (DTSC) Safer Consumer Products Draft Stage 1 Alternatives Analysis (AA) Guide.

IFRA North America is the principal trade association representing the interests of the U.S. fragrance industry. Our members create and manufacture fragrance blends comprised of natural and synthetic aroma molecules for personal care, home care, industrial and institutional use as well as home design products, all of which are manufactured by consumer goods companies. Our Association also represents companies that source and supply individual fragrance ingredients, such as essential oils and other raw materials, which are used in perfumes and fragrance mixtures.

The fragrance industry takes a proactive approach to the safety evaluation of fragrance ingredients. The fragrance industry voluntarily self-restricts the use of fragrance ingredients through the International Fragrance Association (IFRA) Standards, which are developed in collaboration with the Research Institute for Fragrance Materials (RIFM). The IFRA Standards are globally recognized and have been referenced and adopted by multiple regulatory authorities around the world.

The fragrance industry's safety program was discussed in detail at a 2014 fragrance workshop held for California regulators and legislators, including those at CalEPA. This workshop was done in an effort to encourage the Agency to maintain an open dialogue with the industry and to leverage the vast amount of research already developed on fragrances and their ingredients resulting in the risk management measures (i.e. Standards) that are developed through RIFM and IFRA in its regulatory efforts. IFRA North America and its members remain committed to being a partner in this process.

Although our members are not consumer product manufacturers, we are interested in the draft guidance on Alternative Analysis as fragrances were identified in the Priority Product 2015-2017 Three-Year Work Plan (finalized in April, 2015) as relevant to the Beauty, Personal Care and Hygiene Products and Cleaning Products Categories. We appreciate DTSC's objective to provide industry and other stakeholders guidance regarding the development of an AA, but we believe the guidance requires some additional detail as suggested below.

We recognize the effort made by DTSC to clarify that this guidance document is intended to be a resource to assist with development of an AA on a Chemical of Concern in a specific product as required by law, and is not itself a regulation. We also appreciate that the compliance responsibilities are set forth in the statutory and regulatory requirements. However, as guidance, and as the science behind alternatives assessment evolves, there should be tacit acknowledgement that other methodologies, approaches, and data sources may provide equivalent information to comply with the regulatory requirements.

The inclusion of a comprehensive list of relevant factors to consider when preparing an AA is appropriate and necessary for this Guidance. When the DTSC identifies a priority product containing a chemical of concern as a subject for AA, it must be for a specific set of relevant factors that apply to the hazard and/or risk identified for that chemical and product combination. Due to the complexity of the formulations, it is an unnecessary burden to industry to analyze multiple reformulated products for parameters of little to no relevance. Additionally, the AA Guidance is not clear on the process for selection of relevant factors that is required. It is appropriate for the Department to include a broad representation of tools as is represented in the appendices, but more clarification is needed on when and in what situations to utilize these tools. Additional examples representing how to determine which factors are relevant are needed in the guidance. Also, any additional educational workshops and tools that could be offered by DTSC to help clarify this and provide practical utility would be useful.

IFRA North America encourages the Agency to continue its outreach and engagement with industry representatives as it finalizes the AA Guidance.

We appreciate your consideration of our comments and would be happy to provide more information or discuss any of this in detail. If you have questions, please do not hesitate to contact me at [shartigan@ifrana.org](mailto:shartigan@ifrana.org) or 571-317-1505.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne Hartigan".

Suzanne Hartigan, Ph.D.

Director, Science Policy and Regulatory Affairs

IFRA North America