



August 29, 2016

Mr. Benjamin Molin
Office of Legal Affairs
Department of Toxic Substances Control
1001 I Street Sacramento, California 95812-0806

**RE: SAFER CONSUMER PRODUCTS REGULATIONS – Listing Children’s
Foam Padded Sleeping Products Containing TDCPP or TCEP As a Priority
Product**

Dear Mr. Molin:

The Juvenile Products Manufacturers Association (JPMA) submits the following comments on the Department of Toxic Substances Control’s (Department; DTSC) “Proposed Regulations: Proposal to List Children’s Foam-Padded Sleeping Products Containing TDCPP or TCEP as a Priority Product.” JPMA has submitted comments in the past on this topic.¹

The Juvenile Products Manufacturers Association (JPMA) is a national not-for-profit trade organization representing 95% of the prenatal industry including the producers, importers and distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. JPMA exists to advance the interests, growth and well-being of North American prenatal to preschool product manufacturers, importers and distributors marketing under their own brands to consumers. It does so through advocacy, public relations, information sharing, product performance certification and business development assistance conducted with appreciation for the needs of parents, children and retailers. JPMA continues to work with government officials, consumer groups and industry leaders on programs to educate consumers on the safe selection and use of juvenile products.

As the DTSC is aware, our industry has worked hand in hand with the California Bureau of Electronic and Appliance Repair, Home Furnishings and Thermal Insulation (BEARHFTI) in the development, and implementation of the revised Technical Bulletin 117-2013 (TB117-2013) which exempts certain juvenile products from having to meet California’s strict flammability standard; which are similar to many other exempt products. These exemptions provided our manufacturers with the relief necessary to reduce the use of restricted flame retardant chemicals from many of our products, including nap mats.

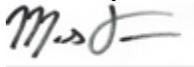
¹ <https://www.dtsc.ca.gov/SCP/upload/JPMA-DTSC-Comments-Final.pdf>

Like the DTSC, we share the mutual objective of eliminating the use of hazardous chemical flame retardants in our products, and wish to be an active and forthcoming participant in this process. We note that our member's products are already highly regulated under the Federal Hazardous Substances Act ("FHSA") which restrict acute or chronic hazardous exposure to children from children's products.

As DTSC prepares for the release of subsequent Priority Products, JPMA urges the Department to continue to engage potential affected industries early-on in order to foster a mutually-beneficial dialogue. Greater industry consultation, thoughtful communications, and thorough product-chemical research will help to ensure more meaningful implementation of the Safer Consumer Products Regulation.

JPMA has the shared interest of ensuring that only *safe and reliable* products are available for use by the consumer. Please know that we remain committed to working with the DTSC in making our shared goals a reality. If you have any questions or concerns, please do not hesitate to contact me directly.

Sincerely,



Mark S. Fellin, MPS

Director of Regulatory and Legislative Affairs

The Juvenile Products Manufacturers Association (JPMA)