

October 18, 2007

Lynn Hampton, Chairperson  
Environmental Quality Commission  
Department of Environmental Quality  
811 SW 6th Ave.  
Portland, OR 97204-1390

Chairperson Hampton and Members of the Commission,

On behalf of the Oregon Chemicals Policy Work Group we would like to thank you for taking public comments at this time on your Strategic Directions for 2006-2011. The Oregon Chemicals Policy Work Group (CPWG) includes four nonprofit groups working on toxics reduction and safer chemicals in Oregon for many years: Oregon Toxics Alliance, Oregon Physicians for Social Responsibility, Oregon Environmental Council and Oregon Center for Environmental Health. After decades of efforts to reduce toxics – one chemical, one product or one place at a time – we have begun to work in partnership to bring a more comprehensive strategy to reduce toxics and promote safer chemicals in Oregon.

We believe that toxics reduction and chemicals policy reform will take on increasing significance in the coming months and years. We are encouraged by the efforts of other coalitions in many states around the country. There is a growing body of evidence that even in small amounts, chemicals our air, water, food and in common consumer products build up in the environment, and have the potential to bio-accumulate in wildlife and in humans. The growing awareness of this problem and determination of many dedicated individuals give us hope that there is a solution, and we think that Oregon can help play a leading role in that solution.

We are pleased to see specific mention in your Strategic Directions of these issues. We believe your Strategic Directions are very important in setting priorities for the coming years, and note that three of the four pertain in one way or another to safer chemicals – promoting sustainability, improving air and water quality, and protecting Oregonians from toxic pollutants. We are also encouraged by several other current efforts in Oregon to address toxics reduction and chemicals policy reform issues, including the Governor's Toxics Policy Work Group and the Legislative Interim Committee Work Group on Pesticides and Health.

Focusing on the Strategic Direction related to toxic pollutants, the current implementing strategies are “preventing and reducing toxic chemical releases”, and “cleaning up and reducing risks from toxics already in our environment.” While we agree that a comprehensive chemicals strategy should include “end of the pipe” controls as well as “clean up” of contaminated sites, we encourage you to expand this Strategic Direction to include more preventive measures as well – for example, reducing the amount of toxics produced and used in products and processes, finding safer alternatives, and promoting green chemistry. It was common to think of industrial production as “cradle to grave;” it is now

understood that these chemicals really don't have a grave. Industrial toxics remain in one form or another – especially persistent, bioaccumulative toxics. In order to advance toxics reduction and comprehensive chemicals policy reform, the CPWG is working with colleagues in the public and private sectors. The newly formed Oregon Chemicals Policy Roundtable is a collaborative group of professionals working in the fields of solid waste, hazardous waste, waste reduction, pollution prevention, toxics reduction and safer chemicals. The CPWG, working with the Roundtable group, has developed a draft Call for Safer Chemicals to Protect Our Health and Our Environment. The Call for Safer Chemicals presents policy option and new approaches to toxics reduction and safer chemicals:

- Provide complete information on chemical ingredients and their toxicity
- Categorize chemicals into levels of concern
- Manage chemicals based on hazards and substitute those of highest concern with safer alternatives
- Establish tools to move Oregon toward a healthier environment
- Ensure that workers and impacted communities are protected
- Provide adequate funding and enforcement to implement chemicals policy reform

We believe the Call for Safer Chemicals will be hopeful in developing and implementing toxic reduction and safer chemicals policy reforms in Oregon, and we look forward to working with governmental agencies and a wide range of stakeholders toward these goals.

We thank you for the opportunity to comment on the Strategic Directions, and to provide some background information on the work we are doing to help move the conversation in Oregon forward on toxics reduction and safer chemicals. Your leadership is critical in placing environmental and public health as the paramount concerns and giving new life to the DEQ's mission to "be a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water." Oregon's legacy is one of environmental stewardship and sustainability, and toxics reduction and safer chemicals are integral parts of this vision.

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