

**Comments:** Included as “Attachment 2” to comment letter submitted by The Association of Global Automakers, Inc. for the External Scientific Peer Review dated January 2013

Response:

DTSC respectfully disagrees that it has employed circular logic in its presentation to the Environmental Policy Council. A multi-media assessment of the regulations, which do not identify any product-chemical combinations, could not assess any unintended impacts of the regulations. The regulations merely establish the process by which chemicals are identified, and their uses in products are evaluated. They also specify the range of regulatory responses available to DTSC following the completion of Alternatives Analyses. Having considered the above, the Council conclusively determined that *the regulations* will not have any significant adverse impact on public health or the environment.

DTSC will consider the need to conduct appropriate environmental review when chemical-specific regulations are proposed. The regulations now make explicit that the Priority Products list that is established will be adopted as a rulemaking under the APA process. As such, DTSC will prepare an economic and fiscal impact analysis, as required with each rulemaking and address economic impacts on the relevant industries. DTSC will also receive and respond to public comments on the Priority Products List.

DTSC is not making any changes to the regulations in response to these comments.