



# Introduction to the Alternatives Analysis Process

This Fact Sheet is for the Responsible Entity<sup>1</sup> subject to the Alternatives Analysis (AA) requirements in the California Safer Consumer Products (SCP) regulations<sup>2</sup>. It introduces the SCP AA process. It is not intended to be a step-by-step guide or checklist. It describes the two stages of the AA process and the extension process.

**Responsible Entities have specific responsibilities under SCP regulations**, including to provide an AA for their Priority Product and ensure the analysis complies with the regulations. Responsible Entities should consult the SCP regulations to ensure compliance.

## Alternatives Analysis: Two-Stage Process

Through the AA process, a Responsible Entity completes a systematic comparative evaluation of the Priority Product and one or more alternatives. The goal of the AA is to determine how best to limit exposure or to reduce the level of hazard posed by a Chemical of Concern in the product. In an AA,

a Responsible Entity analyzes the potential hazards and critical exposure pathways for the possible alternatives and selects the alternative that will replace the Priority Product – unless the decision is to retain the existing Priority Product. The AA is a two-stage AA process. Each stage of the process contains specific steps detailed in the regulations<sup>3</sup>.

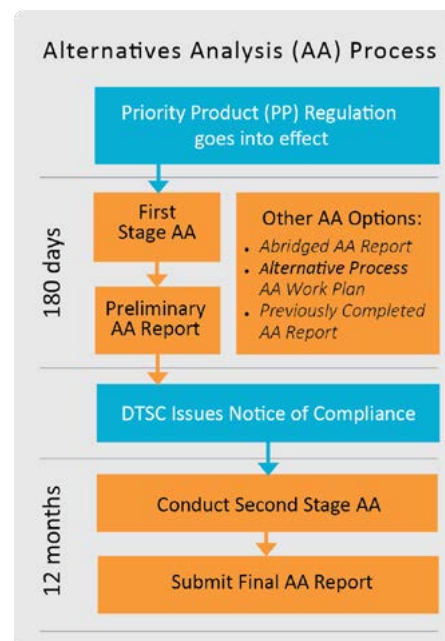
The **first stage AA** is an alternatives screening and planning stage. The Responsible Entity will determine potential alternatives for the Priority Product's Chemical of Concern and complete the following steps:

- 1) Identification of product requirements and function(s) of Chemical(s) of Concern
- 2) Identification of alternatives
- 3) Identification of factors relevant for comparison of alternatives
- 4) Initial evaluation and screening of alternative replacement chemicals
- 5) Consideration of additional information
- 6) Preliminary AA Report preparation & submittal to the Department of

Toxic Substances Control (DTSC)

In **the second stage** of the AA process, the Responsible Entity conducts a more in-depth comparison of potential alternatives identified in the first stage Preliminary AA Report (Step 6 above) using the following steps:

- 1) Refinement of the relevant factors for comparison of alternatives identified in the first stage
- 2) Detailed comparison of the Priority Product and alternatives including the economic impacts
- 3) Consideration of additional



<sup>1</sup> A "Responsible Entity" may be a manufacturer, importer, assembler, or retailer of a listed Priority Product.

<sup>2</sup> Cal. Code Regs., tit. 22, § 69505 et seq

<sup>3</sup> Cal. Code Regs., tit. 22, § 69505.5 & § 69505.6

information, such as, consumer acceptance or economic impacts

- 4) Alternative selection decision
- 5) Final AA Report preparation & submittal to DTSC

Although there is no specific reporting format for the two-stage AA process, there are specific elements required in the analyses and reports.

## Requirements

Both the Preliminary AA Report and the Final AA Report are required to include the following:

- Executive Summary
- Preparer Information
- Responsible Entity and Supply Chain Information
- Priority Product Information
- Scope of Relevant Comparison Factors
- Scope and Comparison of Alternatives
- Methodology
- Supporting Information
- Selected Alternatives
- Next Steps

The Next Steps discussion in the Preliminary AA Report must include:

- a detailed workplan and proposed implementation schedule for completing the second stage AA, and submittal of the Final AA Report

The Next Steps discussion in the Final AA Report must include:

- a detailed plan for implementing any selected alternatives

DTSC has published its [SCP Alternatives Analysis Guide](#) to aid the analysis.

It is a compendium of useful resources, tools, and approaches for completing an AA.

## Preliminary AA Report

A Responsible Entity must submit the Preliminary AA Report to DTSC no later than 180 days after the date the product is listed on the final Priority Products list.

Once DTSC issues a notice of compliance for the Preliminary AA Report, the Responsible Entity begins the second stage AA process to develop the Final AA Report.

## Final AA Report

A Responsible Entity must submit the Final AA Report to DTSC no later than 12 months after the date DTSC issues a notice of compliance for the Preliminary AA Report.

## Extensions

The Responsible Entity may request a one-time extension of up to 90 days from the original due date of the Preliminary AA Report. The extension request must be received by DTSC at least 60 days before the applicable

## Did you know?

The Preliminary and Final AA Reports can be submitted through SCP's Information Management System, **CalSAFER** ([calsafer.dtsc.ca.gov/](https://calsafer.dtsc.ca.gov/)).

due date of the report and must be based on circumstances that could not reasonably be anticipated or controlled. Similarly, the Responsible Entity may request an extension of the due date for the submittal of the Final AA Report. The extension request must not exceed 24 months from the date DTSC issues the notice of compliance for the Preliminary AA Report and must include a detailed explanation of why additional time is needed.

## Questions and Answers

*What if there are no viable alternatives available to the Chemical of Concern in the Priority Product?*

If, after completing the first five steps of the first stage AA, the Responsible Entity determines there are no viable alternatives to the Chemical of Concern in the Priority Product, then the responsible entity has the option to complete an Abridged AA<sup>4</sup> (See the [SCP AA Reporting Options](#)).

4 Cal. Code Regs., tit. 22, § 69505.4(b)

*Is there a template or format for the AA reports?*

DTSC does not require a specific format for the Preliminary or Final AA reports. The Responsible Entity will submit the specific information required by the regulations in a self-developed format.

DTSC has created a [Preliminary Alternatives Analysis \(PAA\) Report Template](#) to assist Responsible Entities in organizing and presenting their PAA Report. It is important to review the SCP regulations before using the PAA Report template.

Appendix 1 in the [SCP Alternatives Analysis Guide](#) is available to help a Responsible Entity navigate the SCP AA regulatory requirements.

*If an AA of the Priority Product has already been completed, does a new AA need to be done to satisfy the SCP two-stage AA process?*

A Responsible Entity can submit an Alternate Process AA or a Previously Completed AA to DTSC in lieu of the Preliminary or Final AA Reports. The information submitted must be substantially equivalent to the requirements of the two-stage AA process and adequate for evaluating the Priority Product and the alternatives<sup>5</sup>. (See the [SCP AA Reporting Options](#))

---

<sup>5</sup> Cal. Code Regs., tit. 22, § 69505.4(c) & (d)

## Additional Resources

DTSC has developed the following additional resources to help Responsible Entities:

[Alternatives Analysis Guide](#)

[Alternatives Assessment Examples](#)

[Preliminary Alternatives Analysis Report Template](#)

[Alternatives Analysis Technical Assistance Videos & Presentations](#)

[Alternatives Analysis Fact Sheets](#)

These resources and more information on AA are available on the SCP website at:

[www.dtsc.ca.gov/SCP/AlternativesAnalysis.cfm](http://www.dtsc.ca.gov/SCP/AlternativesAnalysis.cfm)

## Further Information

Still in need of help? Contact SCP at [SaferConsumerProducts@dtsc.ca.gov](mailto:SaferConsumerProducts@dtsc.ca.gov).

To receive the latest information and updates from the Department, join the [SCP Program e-mail list](#) (EList)

or visit: <http://www.dtsc.ca.gov/ContactDTSC/ELists.cfm>.