|  |  |  |
| --- | --- | --- |
| **Version** | **Date** | **Changes** |
| 1.1 | March 2019 | Added Section 4.4 Consideration of Additional Information.  Added references to the AA Guide.  Formatting and editorial changes. |
| 1.2 | June 2020 | Added ADA Accessible formatting changes. |

**Preliminary Alternatives Analysis Report Template**

**Version 1.2 (June 2020)**

# Instructions

This Preliminary Alternatives Analysis (PAA) Report template is designed to assist responsible entities in organizing and presenting their PAA Report. Before using this template and for detailed guidance on how to prepare a PAA Report, it is important to review the [Safer Consumer Products (SCP) regulations](https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/07/SCP-Final-Regs-Text-10-01-2013.pdf) and the latest version of the [Alternatives Analysis (AA) Guide](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/AA-Guide-Version-1-0_June-2017.pdf). The first stage of the AA shall be completed in accordance with the California Code of Regulations, title 22, section 69505.5, and a PAA Report shall be submitted that complies with Sections 69505.1(b)(2)(A) and 69505.7.

Responsible entities may use this template to prepare their PAA Report or any format of their choice. In the PAA Report, identify and describe the analytical tools, models, and software used to conduct the AA and discuss their limitations. Identify any published methodologies or guidelines used, and any deviations from those methodologies or guidelines.[[1]](#footnote-2) All information used as supporting information in performance of the AA and preparation of the AA Report must be cited and made available to the Department upon request. Include a summary of the information reviewed and considered under Section 69505.1(d).[[2]](#footnote-3) Page numbers and a table of contents should also be included for ease of reference. Except as provided in Section 69505.1 (b)(2)(C), the due date for the PAA Report is 180 days after the date the product is listed on the final Priority Products list, unless the Department specifies a different due date in the Priority Products list.

Once the PAA Report is completed, it can be submitted by PDF through the [CalSAFER](https://calsafer.dtsc.ca.gov/) website. The PAA Report will be made publicly available and published on the CalSAFER website. If the PAA report contains information claimed to be a trade secret, a separate publicly available PAA report shall be submitted to the Department that excludes claimed trade secret information only to the extent necessary to protect its confidential nature.[[3]](#footnote-4) The responsible entity will also need to submit a claim of trade secret protection per Section 69509.

# Legal Note

This template is not a standard or regulation and it creates no new legal obligation. The template is advisory in nature, informational in content, and is intended to assist responsible entities who are preparing Alternatives Analysis reports. This template does not alter or determine compliance responsibilities set forth in statutory and regulatory requirements.

**[Title Page:]**

**Preliminary Alternatives Analysis Report**

**[Chemical(s) of Concern] found in [Priority Product]**

**Prepared by:**

**[Responsible Entity name or Consortium name]**

**Date: [insert date]**

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# TABLES

[Insert a list of tables and corresponding page numbers.]

# FIGURES

[Insert a list of figures and corresponding page numbers.]

# Acronyms and Abbreviations

[Insert a list of acronyms/abbreviations and definitions.]

# Executive Summary

[Include a publicly available executive summary sufficient to convey a general understanding of the scope and results of the First Stage AA and the rationale for selecting those alternatives to be further evaluated in the Second Stage AA. The summary must be organized in conformance with the organization of the AA Report and must include a detailed summary of the information presented for each section of the AA Report. Information for which trade secret protection is claimed must not be included in the executive summary.[[4]](#footnote-5)]

# 1.0 Preparer Information

[Include the following in this section:

* + The name and contact information of the person submitting the AA Report;
  + If applicable, the name and contact information of all responsible entities on whose behalf the AA Report is being submitted; and
  + The names of the parties that were involved in funding, directing, overseeing, preparing, and/or reviewing the AA.[[5]](#footnote-6)]

**Preparer Information:**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Job Title** |  |
| **Company** |  |
| **Email** |  |
| **Phone** |  |
| **Address** |  |

**Responsible Entities Information:**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Company** |  |
| **Business Type** | [Assembler, Importer, Manufacturer, Retailer, etc.] |
| **Email** |  |
| **Phone** |  |
| **Website** |  |
| **Address** |  |

**Headquarters of the Responsible Entity (if different from above):**

|  |  |
| --- | --- |
| **Headquarters Phone** |  |
| **Headquarters Address** |  |

**Other Involved Parties:**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Involvement** | [funding, directing, overseeing, preparing, and/or reviewing] |

**Certification and Signatures**

“I certify that this document and all attachments were prepared or compiled under my direction or supervision to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that submitting false information or statements is a violation of law.”

**Responsible Entity Signature \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

[Insert Full Name]

# 2.0 Responsible Entity and Supply Chain Information

[Include the following in this section:

* + The name, contact information, headquarters location of manufacturer(s) and importer(s), if applicable;
  + If the Preliminary AA Report is a consortium, the name and contact information of each participant;
  + The name and contact information for any person(s) identified on the Priority Product label as the manufacturer, importer, or distributor;
  + The name and contact information for all person(s) in California other than the final purchaser or lessee to whom the manufacturer or importer directly sold the Priority Product within the prior 12 months; and
  + The identification and location of the manufacturer’s and/or importer’s retail sales outlets where the manufacturer and/or importer sold, supplied, or offered for sale the Priority Product in California.[[6]](#footnote-7)]

**Manufacturer(s) and Importer(s):**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Company** |  |
| **Business Type** | [Manufacturer, Importer, etc.] |
| **Email** |  |
| **Phone** |  |
| **Website** |  |
| **Headquarters Address** |  |

**Consortium Participants:**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Company** |  |
| **Business Type** | [Assembler, Importer, Manufacturer, Retailer, etc.] |
| **Email** |  |
| **Phone** |  |
| **Website** |  |
| **Address** |  |

**Manufacturer(s), Importer(s), and /or Distributor(s) listed on the Priority Product label:**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Company** |  |
| **Email** |  |
| **Phone** |  |
| **Website** |  |
| **Address** |  |

**Purchasers of Priority Product:**

|  |  |
| --- | --- |
| **First Name** |  |
| **Last Name** |  |
| **Company** |  |
| **Email** |  |
| **Phone** |  |
| **Website** |  |
| **Address** |  |

**Manufacturer(s) and/or Importer(s) Retail Sales Outlets:**

|  |  |
| --- | --- |
| **Company** |  |
| **Email** |  |
| **Phone** |  |
| **Website** |  |
| **Address** |  |

# 3.0 Priority Product Information

[Include the following in this section:

* + The brand name(s) and product name(s) under which the Priority Product is placed into the stream of commerce;
  + If the Priority Product is a component of an assembled product, include a description of the known product(s) in which the component is used;
  + Identify the Chemical(s) of Concern for the Priority Product;
  + A reference to the position in the Appendix of the Material Safety Data Sheets and/or Safety Data Sheets related to the Priority Product.
  + The information specified in paragraphs (1) and (2) of Section 69505.5(a).[[7]](#footnote-8)]

|  |  |
| --- | --- |
| **Brand name(s)** |  |
| **Product name(s)** |  |
| **Product description(s)** |  |
| **Chemical(s) of Concern** |  |

## 3.1 Priority Product Function

[Identify the functional requirements of the Priority Product that must also be met by the alternatives under consideration.]

## 3.2 Priority Product Performance

[Identify the performance requirements of the Priority Product that must also be met by the alternatives under consideration.]

## 3.3 Priority Product Legal Requirements

[Identify the legal requirements of the Priority Product that must also be met by the alternatives under consideration. Legal requirements include specifications, performance standards, and/or labeling requirements that a chemical, product, or product packaging is required to meet under federal or California Law.[[8]](#footnote-9) Examples include requirements of the Federal Hazardous Substances Act overseen by the federal Consumer Product Safety Commission and the consumer product regulations overseen by the California Air Resources Board.]

## 3.4 Role of the Chemical(s) of Concern

[Identify the role, if any, of the Chemical(s) of Concern in meeting the functional, performance, and legal requirements of the Priority Product that must also be met by the alternatives under consideration.]

## 3.5 Is the Chemical(s) of Concern or Alternative Replacement Chemical(s) necessary?

[Determine if the Chemical(s) of Concern or alternative replacement chemical(s) is/are necessary to meet the Priority Product’s requirements identified under paragraphs (1) of Section 69505.5(a).[[9]](#footnote-10)]

# 4.0 Scope of Relevant Comparison Factors

[Identify which factors, associated exposure pathways, and life cycle segments are determined to be relevant, under Section 69505.5(c), for evaluation and comparison of the Priority Product and its alternatives. For each factor, exposure pathway, and life cycle segment, determined not to be relevant, explain the rationale and identify and explain the pertinent findings of the supporting information for this determination.[[10]](#footnote-11)]

*For more information on relevant factors, exposure pathways, and life cycle segments, refer to Chapter 3 of the* [*AA Guide*](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/AA-Guide-Version-1-0_June-2017.pdf)*.*

## 4.1 Relevant Factors

[The following factors, adverse environmental impacts, adverse public health impacts, adverse waste and end-of-life effects, environmental fate, materials and resource consumption impacts, physical chemical hazards, and physicochemical properties, in conjunction with an associated exposure pathway and life cycle segment, if applicable, are relevant factors if:

* The factor makes a material contribution to one or more adverse public health impacts, adverse waste and end-of-life effects, and/or materials and resource consumption impacts associated with the Priority Product and/or one or more alternatives under consideration; and
* There is a material difference in the factor’s contribution to such impacts between the Priority Product and one or more alternatives under consideration and/or between two or more alternatives.[[11]](#footnote-12)]

### 4.1.1 Adverse environmental impacts

### 4.1.2 Adverse public health impacts

### 4.1.3 Adverse waste and end-of-life effects

### 4.1.4 Environmental fate

### 4.1.5 Materials and resource consumption impacts

### 4.1.6 Physical chemical hazards

### 4.1.7 Physicochemical properties

## 4.2 Exposure Pathways

[An exposure pathway is the route a stressor takes from its source to its human or ecological receptor. The identification of relevant exposure pathways shall consider chemical quantity information and the exposure factors specified in Section 69503.3(b). The chemical quantity information includes:

(1) Quantities of the Chemical(s) of Concern or alternative replacement chemical(s) necessary to manufacture the Priority Product and each alternative under consideration; and

(2) Estimated volume and/or mass of the Chemical(s) of Concern or alternative replacement chemical(s) that is/are or would be placed into the stream of commerce in California as a result of the Priority Product and each alternative under consideration.[[12]](#footnote-13)]

*For more information on Exposure refer to Chapter 6 of the* [*AA Guide*](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/AA-Guide-Version-1-0_June-2017.pdff)*.*

### 4.2.1 Chemical Quantity

### 4.2.2 Exposure Factors

## 4.3 Life Cycle Segments[[13]](#footnote-14)

*For more information on Life Cycle Impacts refer to Chapter 7 of the* [*AA Guide*](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/AA-Guide-Version-1-0_June-2017.pdff)*.*

### 4.3.1 Raw materials extraction

### 4.3.2 Resource inputs and other resource consumption

### 4.3.3 Intermediate materials processes

### 4.3.4 Manufacture

### 4.3.5 Packaging

### 4.3.6 Transportation

### 4.3.7 Distribution

### 4.3.8 Use

### 4.3.9 Operation and maintenance

### 4.3.10 Waste generation and management

### 4.3.11 Reuse and recycling

### 4.3.12 End-of-life disposal

## 4.4 Consideration of Additional Information

[The responsible entity may consider pertinent factors and information not specifically identified in Section 69505.5.[[14]](#footnote-15)]

# 5.0 Scope and Comparison of Alternatives

## 5.1 Alternatives Considered

[Identify and describe the alternatives chosen to be evaluated and compared. If it is determined that neither the Chemical(s) of Concern nor alternative replacement chemical(s) is/are necessary to meet the Priority Product’s requirements identified under paragraphs (1) of Section 69505.5(a), one of the alternatives to be evaluated shall include the removal of the Chemical(s) of Concern from the Priority Product without the use of any replacement chemical(s).[[15]](#footnote-16) In addition, identify and consider alternatives that meet the definition of “alternative” under Section 69501.1 and meet the Priority Product’s requirements identified under Section 69505.5(a)(1). Research and evaluate available information that identifies existing possibly viable alternatives for consideration in the AA. This research and evaluation shall include information posted on the Department’s website. Consider any identified alternative in the AA or explain in the AA Report why such an alternative is not viable for consideration.[[16]](#footnote-17)]

*For more information on Identifying Alternatives refer to Chapter 2 of the* [*AA Guide*](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/AA-Guide-Version-1-0_June-2017.pdf)*.*

## 5.2 Rationale for Alternatives not Selected

[Explain the rationale for screening out specific alternatives during the First Stage AA. For any alternative that is screened out because it is determined that its adverse impacts are equal to or greater than those of the Priority Product, describe the method used to determine equal or greater adverse impacts, including the method used to compare the multiple factors associated with the impacts, and the rationale for any trade-offs made among factors.[[17]](#footnote-18)]

## 5.3 Comparison of Chemical(s) of Concern and Alternative Replacement Chemical(s)

[Include the information collected and the comparison conducted under Section 69505.5 for the Chemical(s) of Concern and the alternative replacement chemical(s). This must include a matrix or other summary format, that provides a clear visual comparison that summarizes the information collected regarding the relevant adverse impacts, and their associated relevant exposure pathways and life cycle segments, for the Chemical(s) of Concern and each alternative replacement chemical, and the comparative result of evaluating this information.[[18]](#footnote-19)]

*For more information on Screening of Alternatives refer to Chapter 5 of the* [*AA Guide*](https://dtsc.ca.gov/wp-content/uploads/sites/31/2016/01/AA-Guide-Version-1-0_June-2017.pdf)*.*

# 6.0 Selected Alternative(s)

[Identify and describe the alternatives selected for further evaluation in the Second Stage of the AA, and explain the rationale for the selection decision.[[19]](#footnote-20)]

# 7.0 Work Plan

## 7.1 Discussion of Proposed Tasks for Generating the Final AA Report

[Include the work plan and proposed implementation schedule for completion of the Second Stage AA required to be prepared under Section 69505.5(f)(1). Specify the proposed submission date for the Final AA Report, and ensure that the Final AA Report or progress report, if applicable, will be submitted to the Department no later than twelve months after the Department issues a notice of compliance for the PAA Report.[[20]](#footnote-21)]

## 7.2 Proposed Implementation Schedule

|  |  |  |
| --- | --- | --- |
| **Action Item** | **Description** | **Scheduled Completion Date** |
|  |  |  |

# REFERENCES

[Include a list of references. All information used as supporting information in performance of the AA and preparation of the AA Reports must be cited and made available to the Department upon request.]

# APPENDICES

[Include information relevant for the PAA Report, e.g., Material Safety Data Sheets and/or Safety Data Sheets related to the Priority Product, data sources, methods, assumptions, approaches.]

1. Cal. Code Regs., tit. 22, § 69505.7(h) [↑](#footnote-ref-2)
2. Cal. Code Regs., tit. 22, § 69505.7(i) [↑](#footnote-ref-3)
3. Cal. Code Regs., tit. 22, § 69505.7(a)(4)(A) [↑](#footnote-ref-4)
4. Cal. Code Regs., tit. 22, § 69505.7(b) [↑](#footnote-ref-5)
5. Cal. Code Regs., tit. 22, § 69505.7(c) [↑](#footnote-ref-6)
6. Cal. Code Regs., tit. 22, § 69505.7(d) [↑](#footnote-ref-7)
7. Cal. Code Regs., tit. 22, § 69505.7(e) [↑](#footnote-ref-8)
8. Cal. Code Regs., tit. 22, § 69501.1(a)(41) [↑](#footnote-ref-9)
9. Cal. Code Regs., tit. 22, § 69505.5(a)(3)(A) [↑](#footnote-ref-10)
10. Cal. Code Regs., tit. 22, § 69505.7(f) [↑](#footnote-ref-11)
11. Cal. Code Regs., tit. 22, § 69505.5(c)(1)

    [↑](#footnote-ref-12)
12. Cal. Code Regs., tit. 22, § 69505.5(c)(3) [↑](#footnote-ref-13)
13. Cal. Code Regs., tit. 22, § 69501.1(a)(42) [↑](#footnote-ref-14)
14. Cal. Code Regs., tit. 22, § 69505.5(e) [↑](#footnote-ref-15)
15. Cal. Code Regs., tit. 22, § 69505.5(a)(3)(B) [↑](#footnote-ref-16)
16. Cal. Code Regs., tit. 22, § 69505.5(b) [↑](#footnote-ref-17)
17. Cal. Code Regs., tit. 22, § 69505.7(g) [↑](#footnote-ref-18)
18. Cal. Code Regs., tit. 22, § 69505.7(g)(1) [↑](#footnote-ref-19)
19. Cal. Code Regs., tit. 22, § 69505.7(j)(1) [↑](#footnote-ref-20)
20. Cal. Code Regs., tit. 22, § 69505.7(k) [↑](#footnote-ref-21)