

ADDENDUM TO THE ECONOMIC AND FISCAL IMPACT ANALYSIS (STD 399) AND ATTACHMENT TO STD 399

April 2021

SAFER CONSUMER PRODUCTS REGULATIONS – Listing Carpets and Rugs Containing Perfluoroalkyl or Polyfluoroalkyl Substances as a Priority Product

Department of Toxic Substances Control reference number: R-2019-02
Office of Administrative Law Notice Reference Number: Z-2020-0218-04

On December 30, 2020, the Department of Toxic Substances Control (DTSC) submitted the Economic and Fiscal Impact Analysis (STD 399) of the final regulation package to the Department of Finance (DOF) for its approval.

DTSC has prepared this Addendum that summarizes the changes DTSC made to clarify the assumptions made in the Economic and Fiscal Impact Analysis based on the comments from DOF.

Modification to the Economic and Fiscal Impact Analysis (STD 399) and Attachment to STD 399

(Attachment to STD 399: Page 5)

In the Estimated Costs section of the Economic and Fiscal Impacts Analysis, DTSC estimates the costs to businesses (responsible entities) to complete a Priority Product Notification, an Alternatives Analysis and Report to identify safer alternatives, and to respond to DTSC's Alternatives Analysis Report review, because these are the outcomes required by the proposed regulation.

Following the completion of the Alternatives Analysis, each responsible entity may elect to take one or more actions, which may include, but are not limited to, selecting an identified alternative to the Priority Product (for example, removing or replacing the Chemical of Concern in the Priority Product) or retaining the Priority Product. This decision may result in additional costs or cost savings to the responsible entity. The additional costs or cost savings associated with these decisions are not calculable because they are dependent on the specific factors relevant to each responsible entity's Alternatives Analysis. DTSC cannot pre-determine the outcome of any Alternatives Analysis or the subsequent actions of any responsible entity.

(Attachment to STD 399: Page 7)

In the Estimated Benefits section of the Economic and Fiscal Impacts Analysis, DTSC states a reduction in exposure to PFASs could benefit the health of California's

residents and wildlife. A full description of the potential adverse impacts of PFASs and factors related to potential exposure to PFASs is presented in DTSC (2019) *Product-Chemical Profile for Carpets and Rugs Containing Perfluoroalkyl and Polyfluoroalkyl Substances*, a reference listed in the Initial Statement of Reasons.

(STD 399: Page 1)

A.1.g. Uncheck the box.

(STD 399: Page 2)

B.1. Update years to 2021-2023.

(STD 399: Page 3)

D.3. Costs or savings associated with actions taken after the AA is completed are not calculable because such actions cannot be pre-determined.

E.5. A reduction in exposure to PFASs could benefit the health of California's residents and wildlife. See attachment and DTSC (2019) *Product-Chemical Profile for Carpets and Rugs Containing Perfluoroalkyl and Polyfluoroalkyl Substances*.