

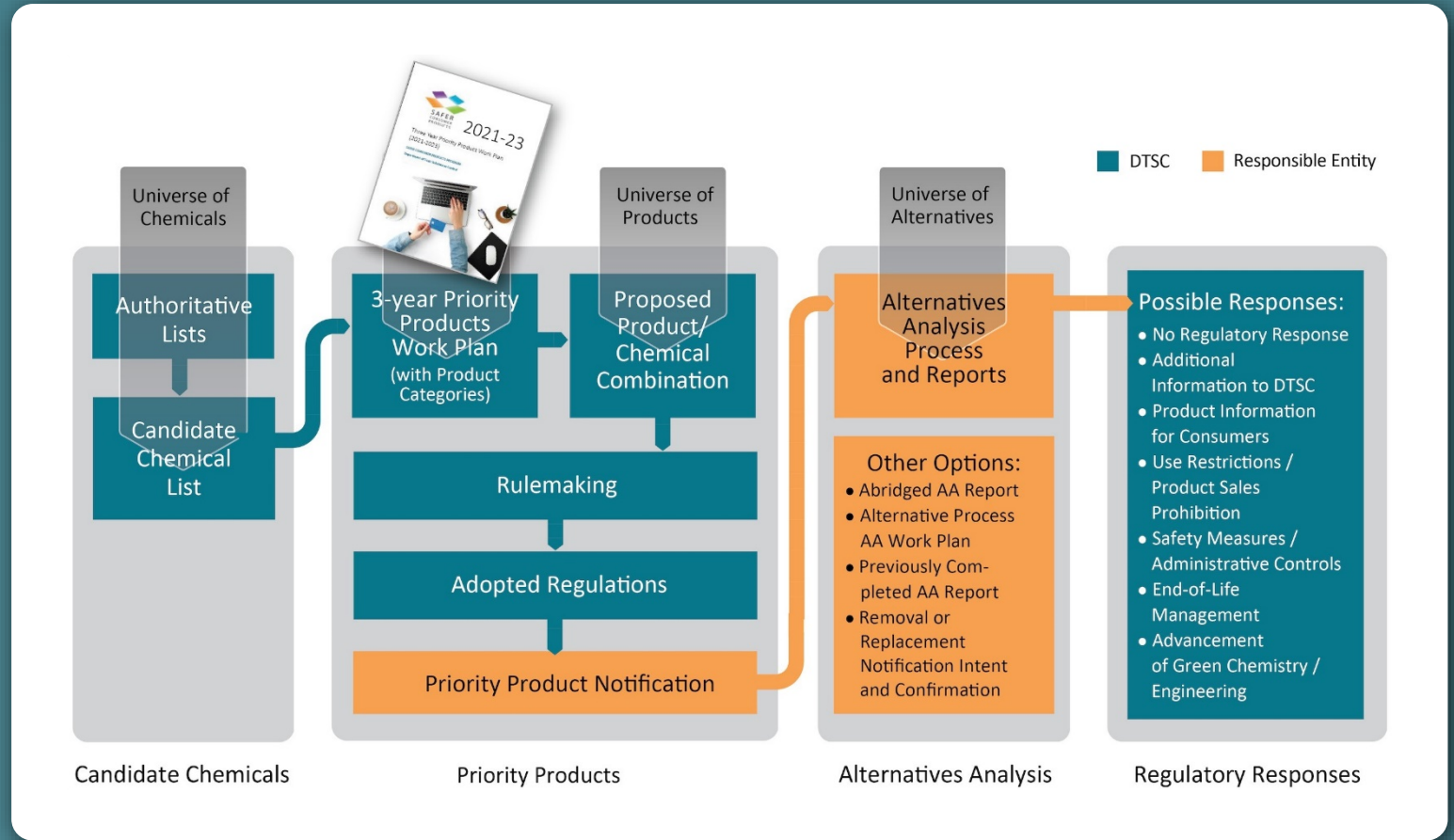


SAFER
CONSUMER
PRODUCTS

SCP
TRAINING
SERIES

COMPLYING WITH
PRIORITY PRODUCT
REGULATIONS

Who is a Responsible Entity?

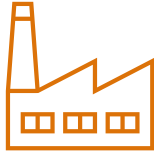


Department of Toxic Substances Control



Cal/EPA

Responsible Entities include:



Manufacturers



Assemblers



Importers



Retailers



The primary duty to comply falls on Priority Product manufacturers

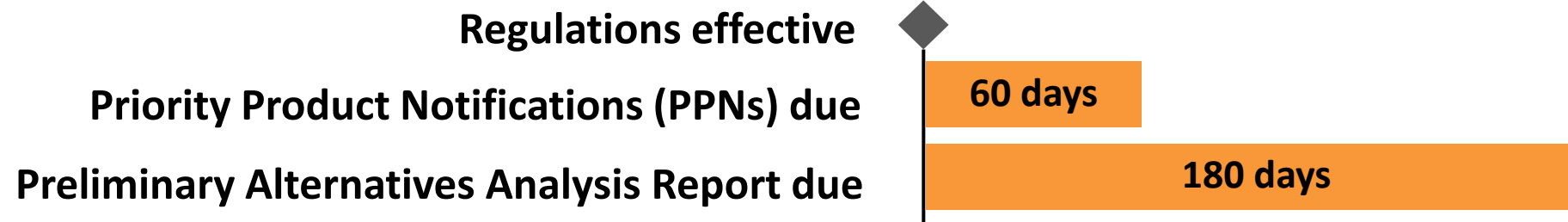
Regulations effective
Priority Product Notifications (PPNs) due



- Submit on calsafeforproducts.com
- Include:
 - Contact information
 - List of all Priority Products manufactured by your company available for sale in California
- Submit only one PPN for all your products.



The PPN submission starts the manufacturers' compliance workflow



Who is a manufacturer?

- “Manufacturer” = any person who:
 - manufactures a Priority Product available for purchase in California (including online)...
 - controls the Priority Product’s manufacturing process...
 - specifies the chemicals to be included in the Priority Product
- **Regardless of where manufacturers are located** (inside or outside U.S.), they must comply if their products are for sale in California.



A tale of two rugs (available for purchase in California)



Rug that contains PFASs:
Manufacturer must submit a PPN



Rug that does NOT contain PFASs:
Manufacturer does not need to submit a PPN

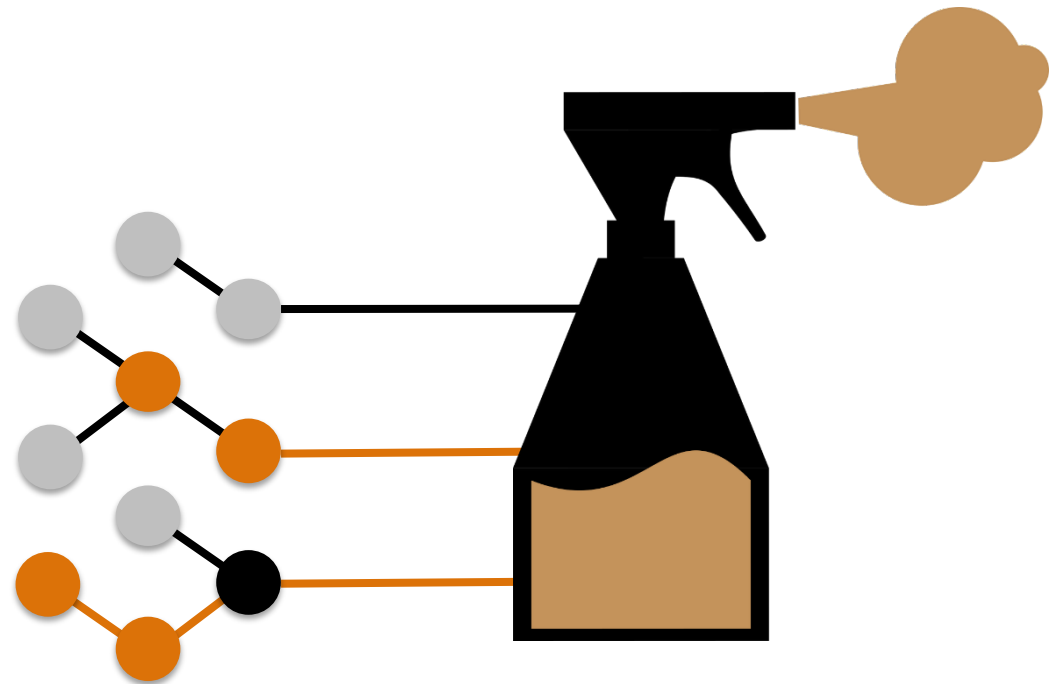
- **Exception:** When DTSC issues an Alternatives Analysis Threshold (AAT), all manufacturers need to demonstrate that the concentration of the Chemical of Concern in their product is below the threshold set by DTSC (see AAT training module).



Who is a manufacturer?

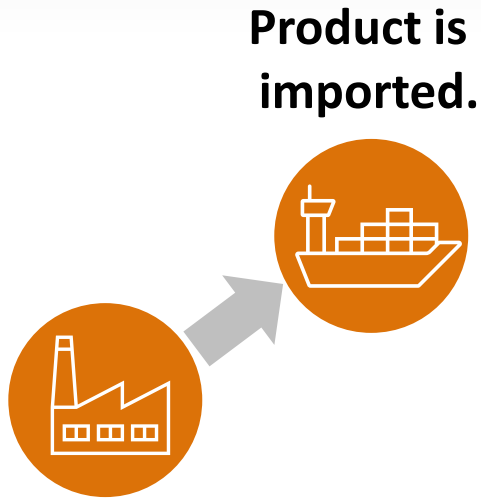
- **Multiple entities along the supply chain** may be considered manufacturers for the purpose of compliance.

- **PFAS-free formulation**
- **Known PFASs**
- **Proprietary formulation**
If unknown PFASs in formula,
its manufacturer must comply
under the SCP regulations



How about importers, assemblers, and retailers?

Product is manufactured.
If manufacturer fails to comply, DTSC places manufacturer on Failure to Comply list

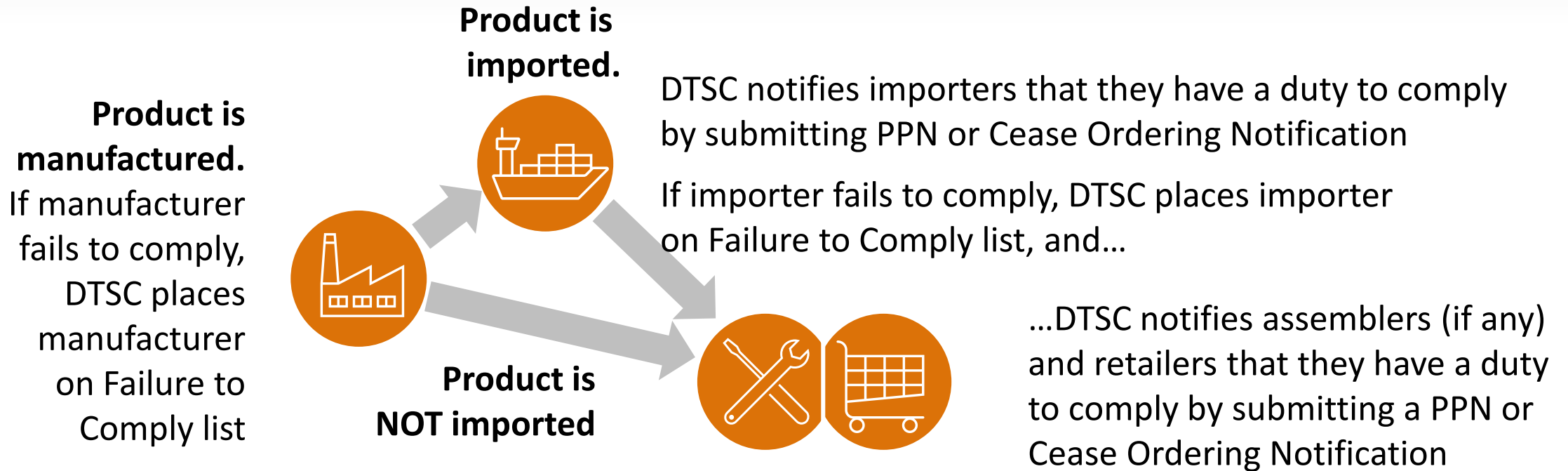


DTSC notifies importers that they have a duty to comply by submitting a PPN or Cease Ordering Notification

- “Importer” means a person who brings, or arranges to bring, a Priority Product into the United States for the purpose of placing the product into the stream of commerce in California.
- “Importer” does not include a person who imports a product solely for use in that person's workplace if that product is not sold or distributed to others.



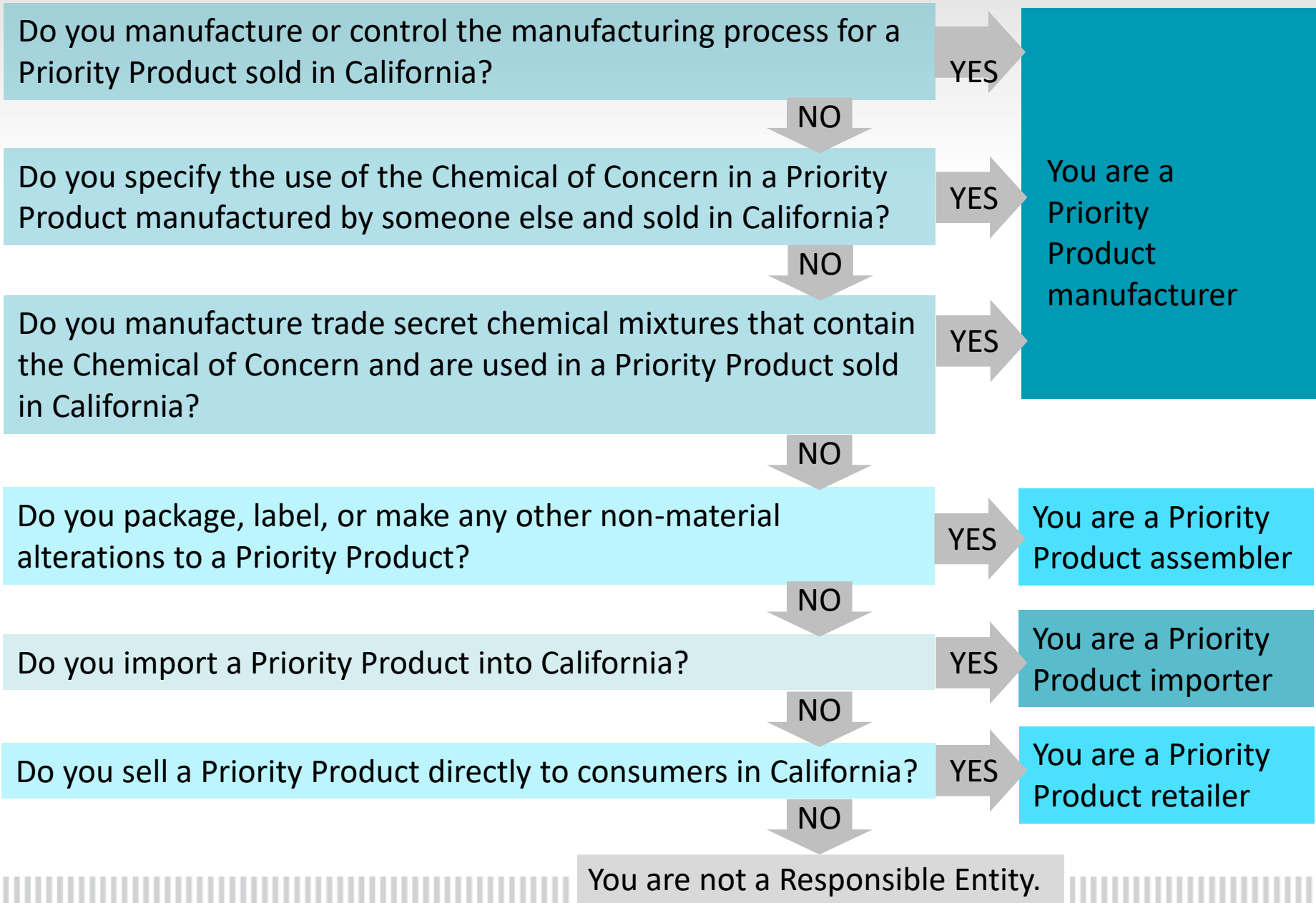
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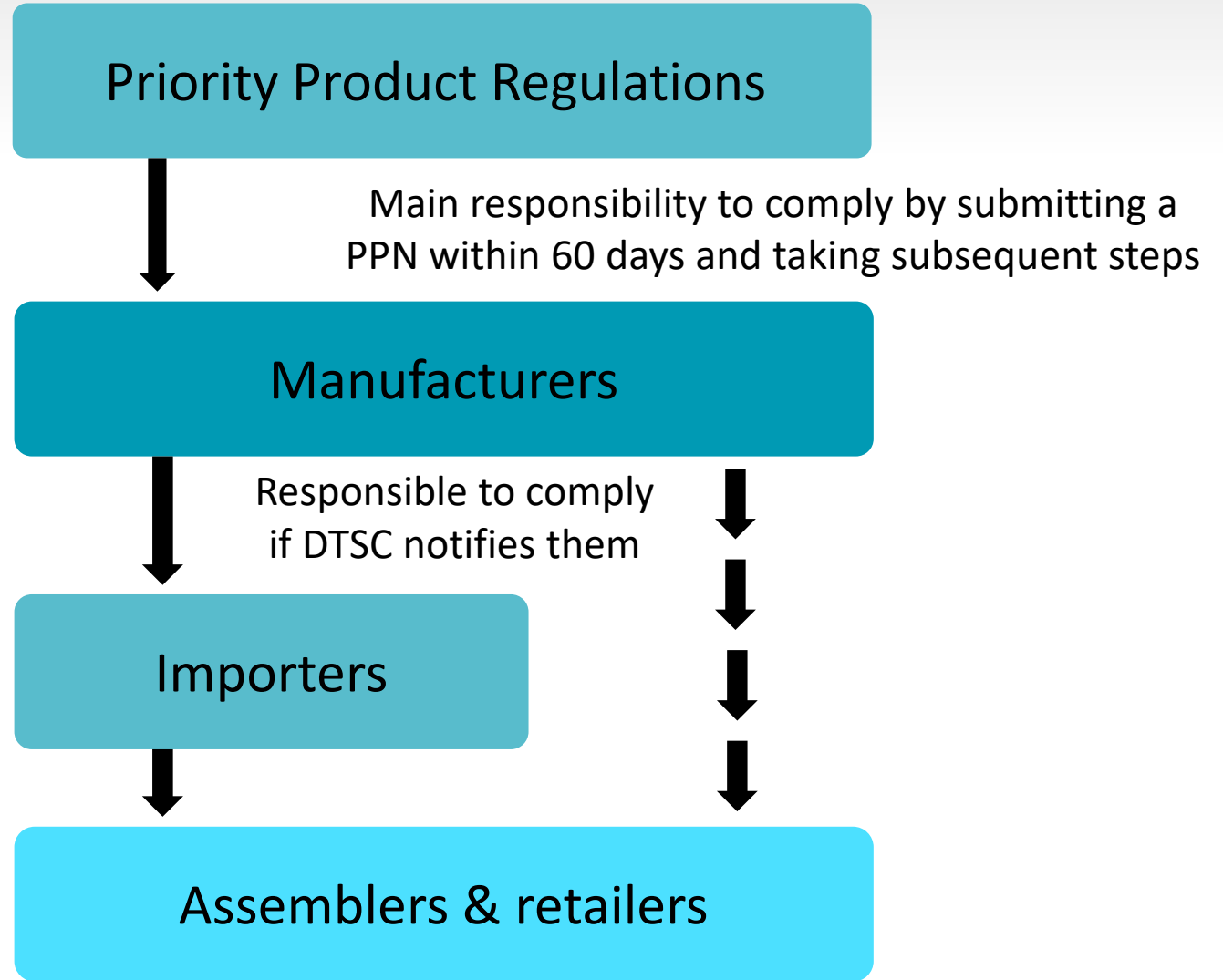
- "Assembler" means any person who fits, joins, puts, or otherwise brings together components to create, repair, refurbish, maintain, or make non-material alterations to a Priority Product.

- "Retailer" means a person to whom a Priority Product is delivered or sold for purposes of sale or distribution to a consumer.

Summary: Who's who?



Summary: Duty to comply



Further Information

- Safer Consumer Products [Regulations](#)
- SCP E-mail List ([E-List](#)):
 - Upcoming regulations, events, workshops
- Further questions? Email us at SaferConsumerProducts@dtsc.ca.gov

Thank you!

