



SCP | COMPLYING WITH
TRAINING | PRIORITY PRODUCT
SERIES | REGULATIONS

Preliminary Alternatives Analysis (PAA)

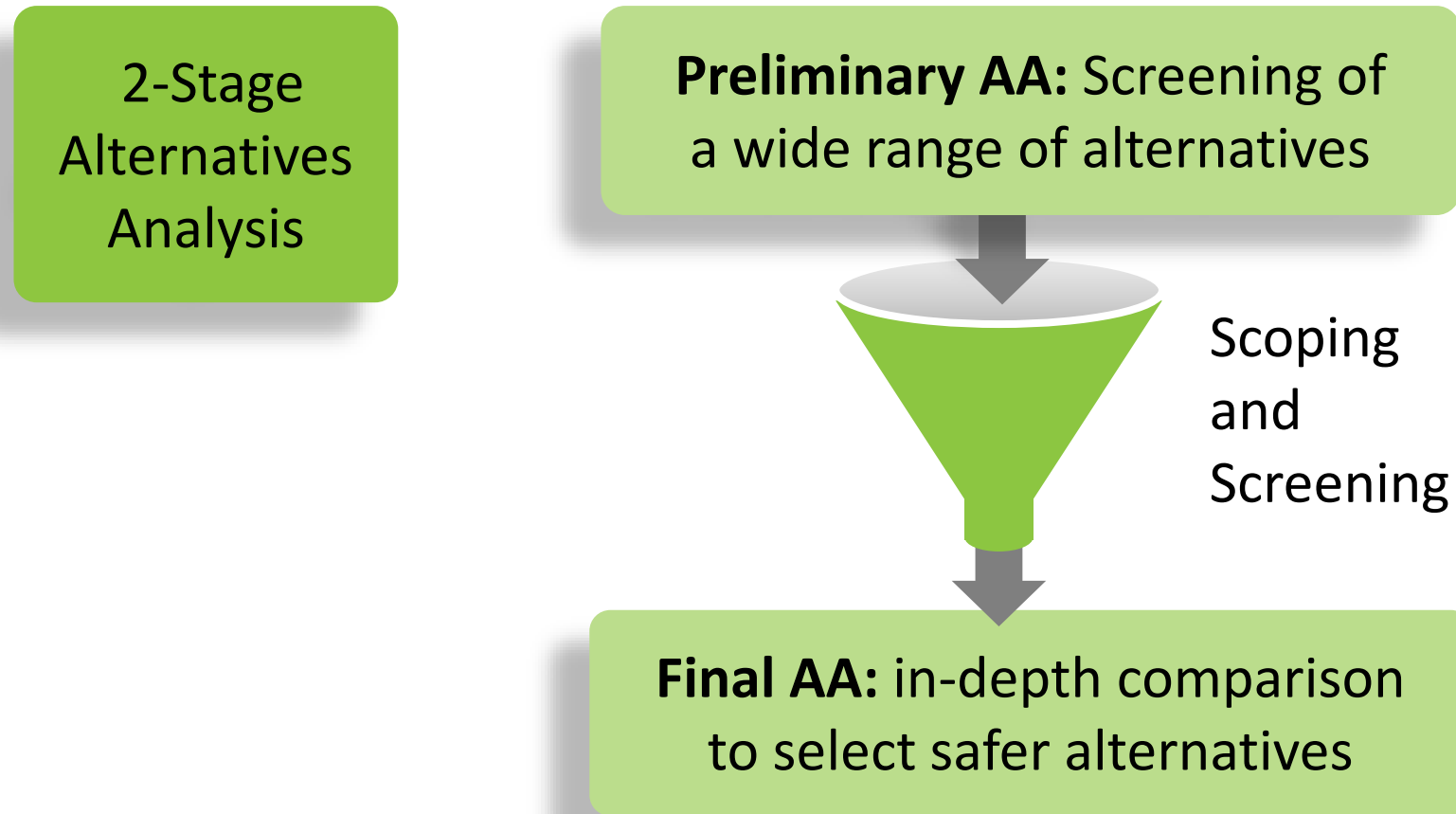


Department of Toxic Substances Control

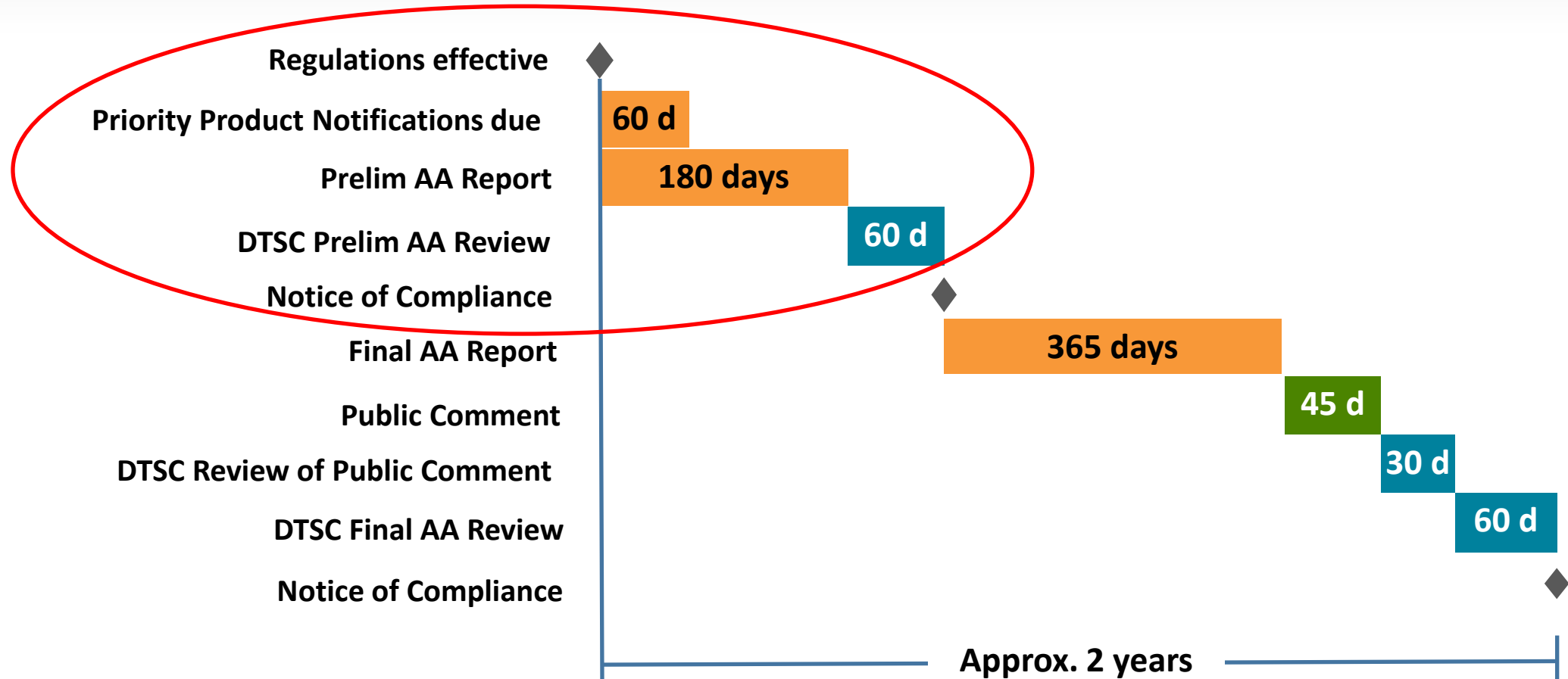


Cal/EPA

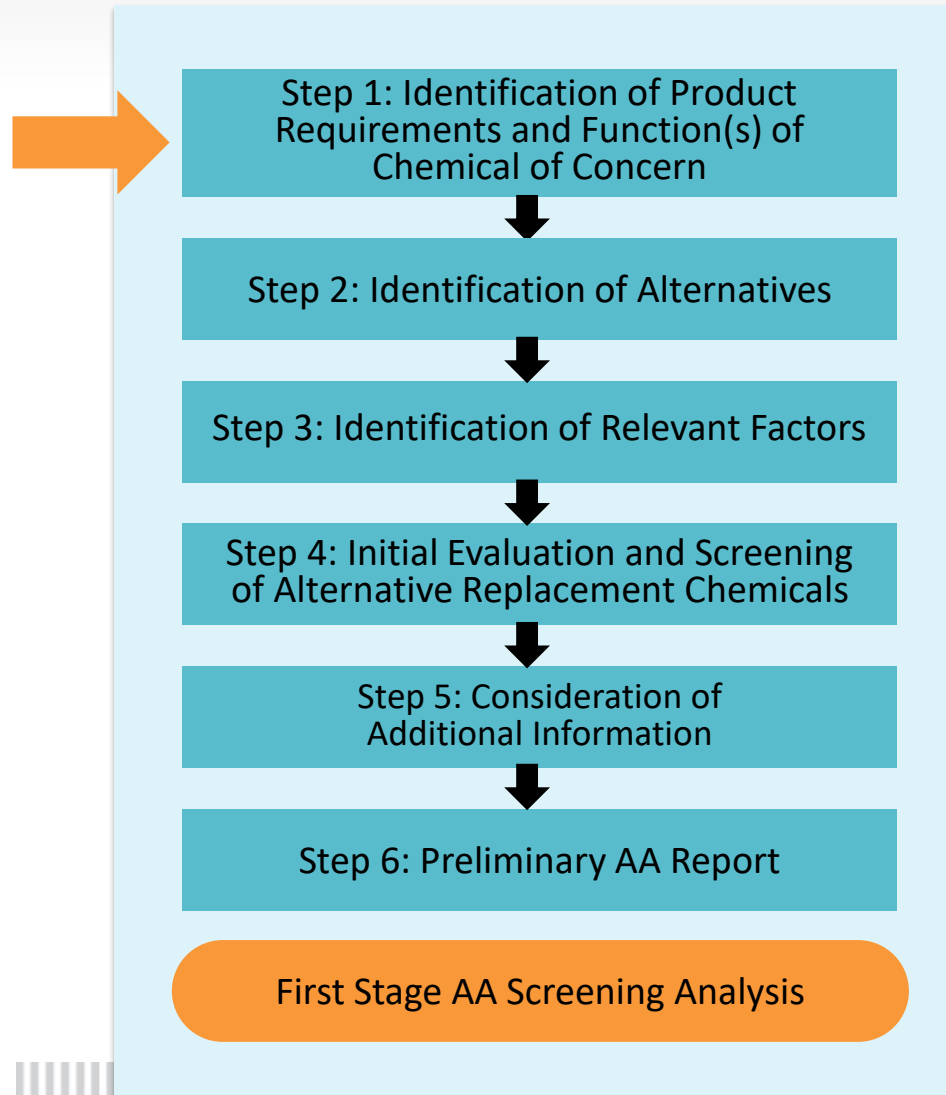
Two-Stage SCP AA Framework



Timeline for the Preliminary AA



Preliminary Alternatives Analysis – Step 1

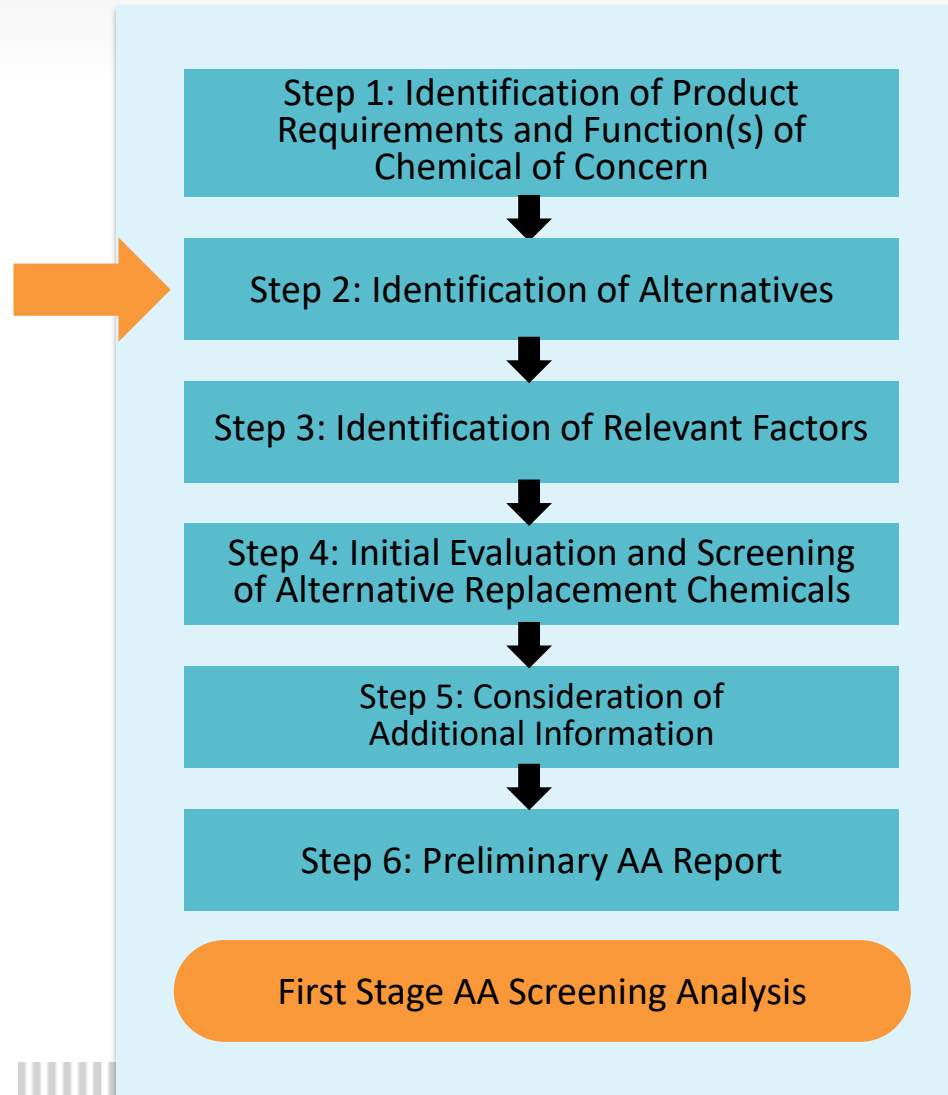


Key Concepts

- Is it necessary?
- Functional use to guide the identification of alternatives

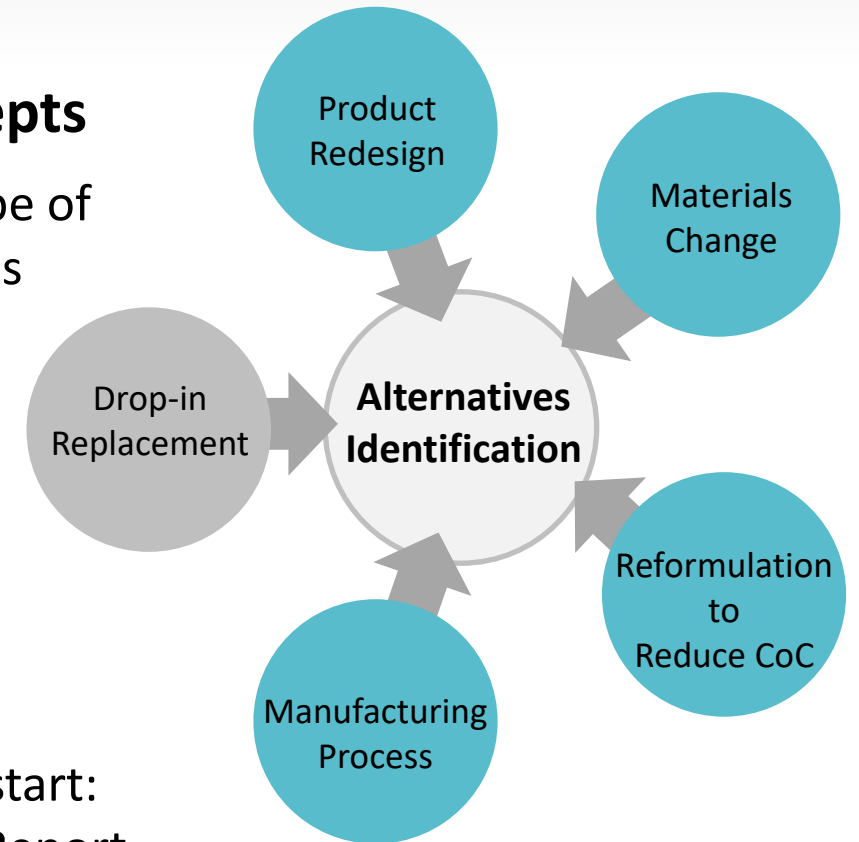


Preliminary Alternatives Analysis – Step 2



Key Concepts

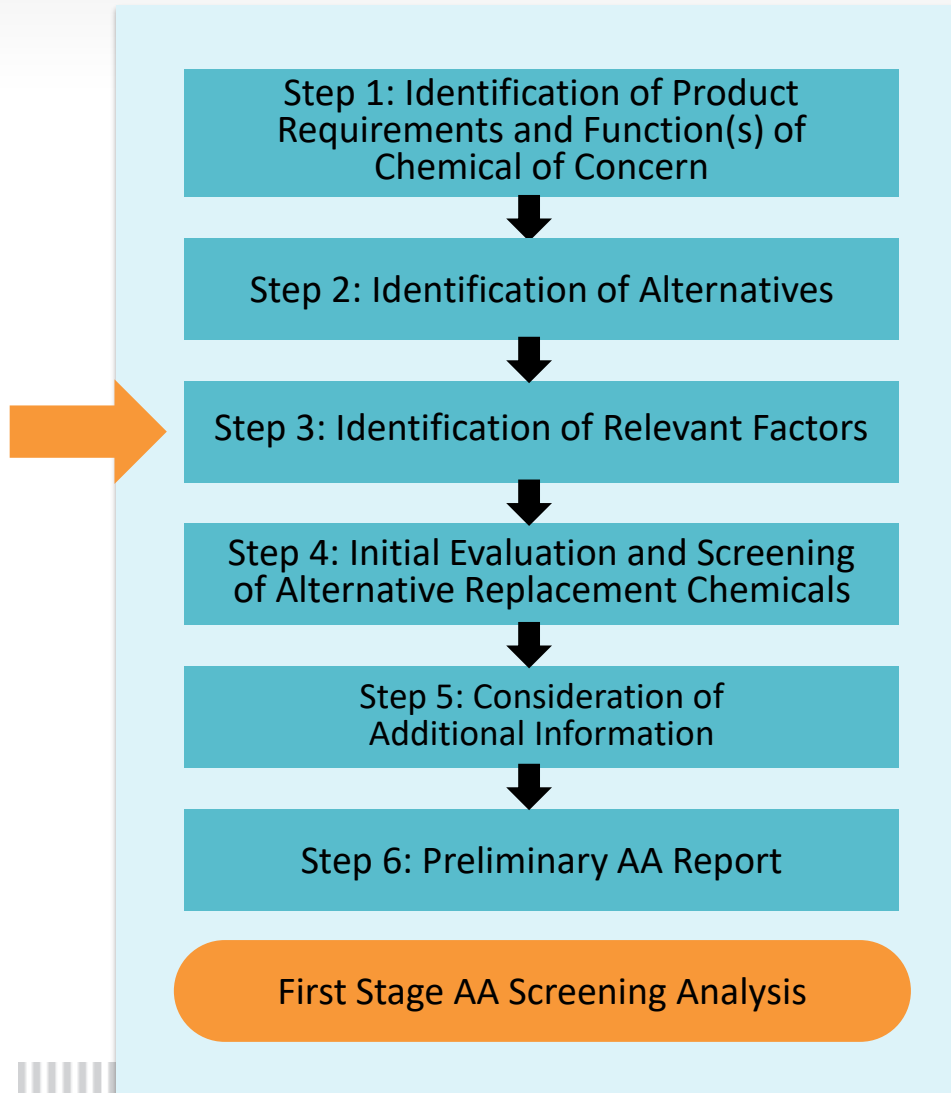
- Broad scope of alternatives



- Where to start:
Technical Report
(the [product-chemical profile](#)) and the SCP website

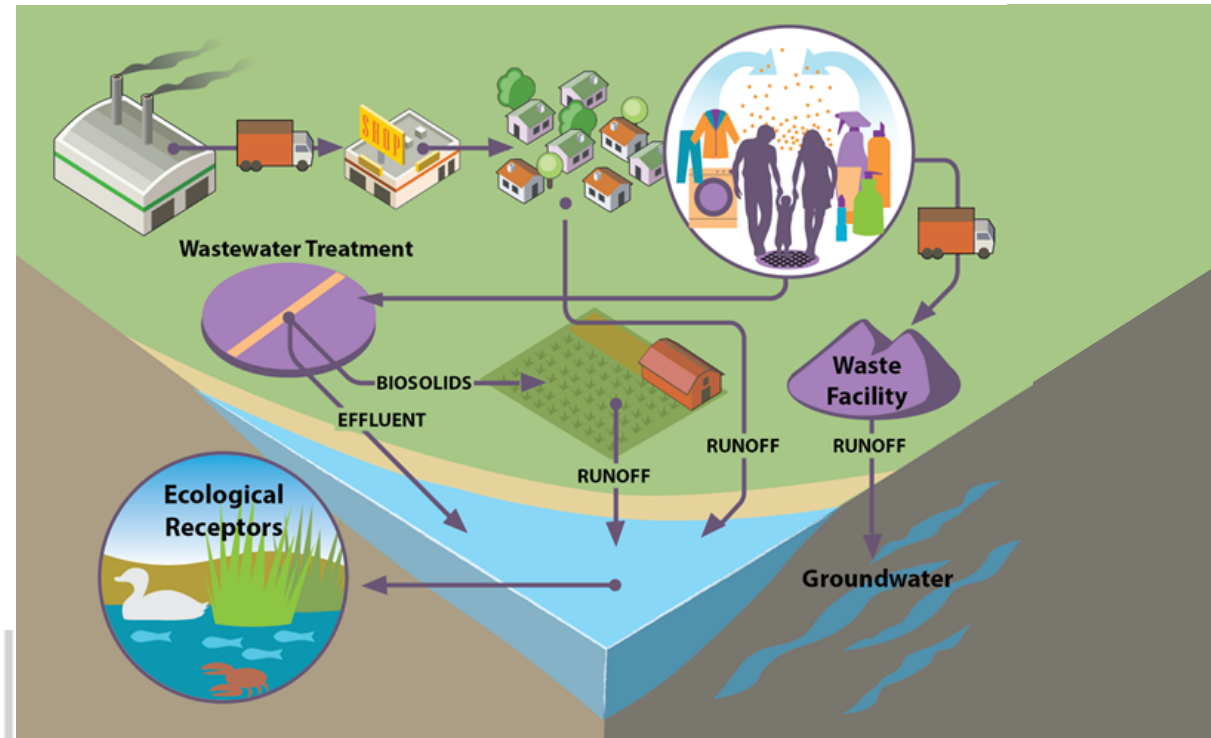


Preliminary Alternatives Analysis – Step 3



Key Concepts

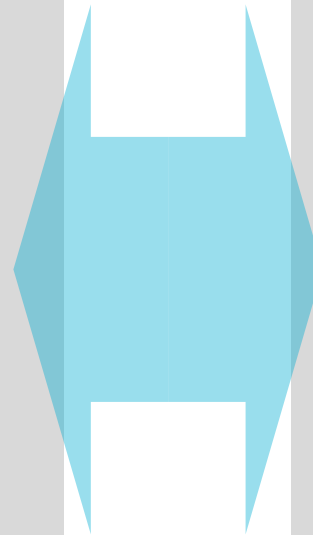
- Life cycle thinking
- Focus the assessment on the important hazard traits, exposure pathways, and life cycle segments



Identification of Relevant Factors

Factors to be considered

- Adverse Public Health Impacts
- Adverse Environmental Impacts
- Environmental Fate
- Adverse Waste and End-of-life Effects
- Materials and Resource Consumption
- Physicochemical Properties
- Physical Chemical Hazards



- **Hazard**
- **Exposure**
- **Life cycle thinking**



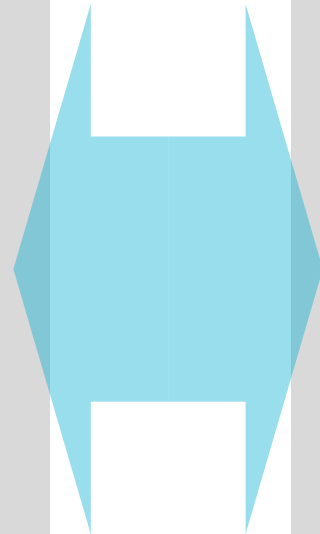
Integrate with Life Cycle Thinking

Factors are relevant if:

- **Material contribution** to any of the adverse impacts

AND

- **Material difference** between the Priority Product and alternatives

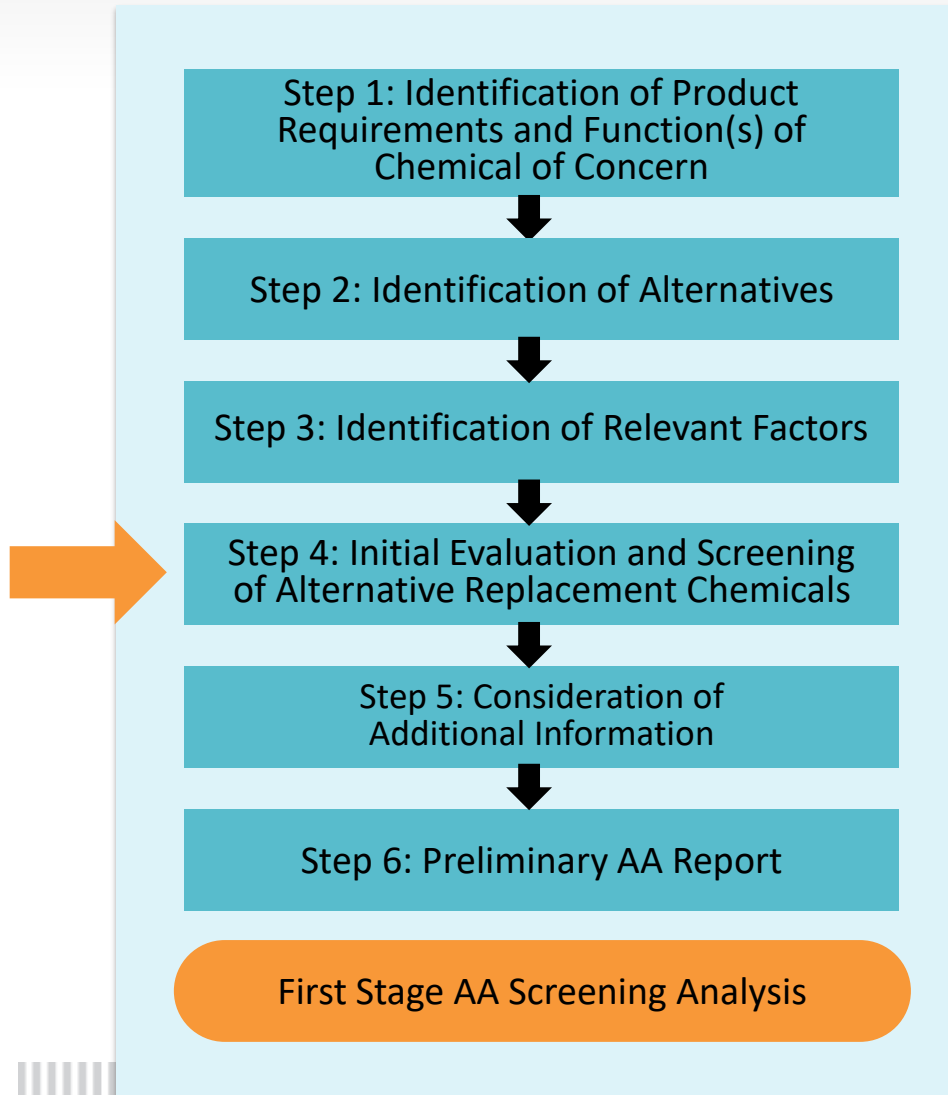


Life Cycle Stages

- Raw material extraction
- Resource inputs and other resource consumption
- Intermediate materials processes
- Manufacture
- Packaging
- Transportation
- Distribution
- Use and operation
- Waste generation and management
- Re-use and recycling
- End-of-life disposal



Preliminary Alternatives Analysis – Step 4

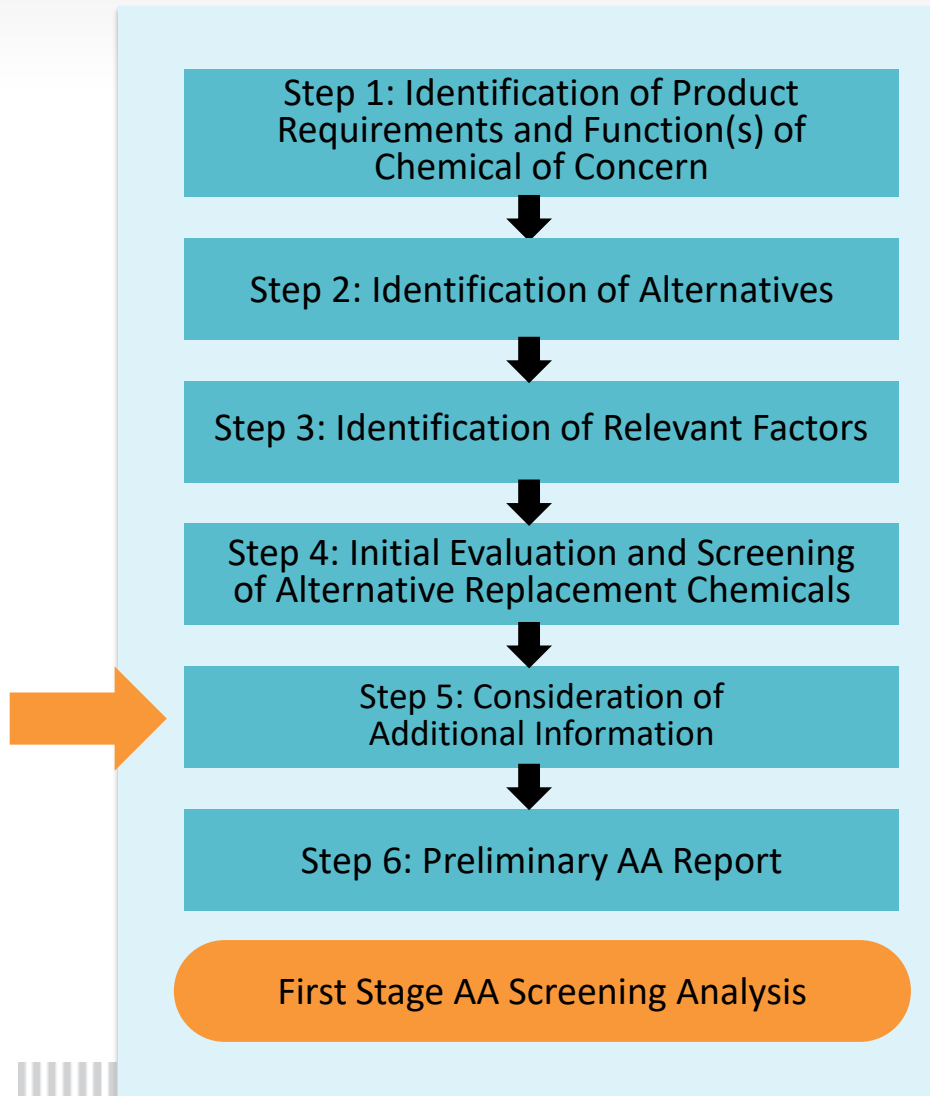


Key Concepts

- Avoid regrettable drop-in substitutes
- Select alternatives for further analysis in the Final AA



Preliminary Alternatives Analysis – Step 5

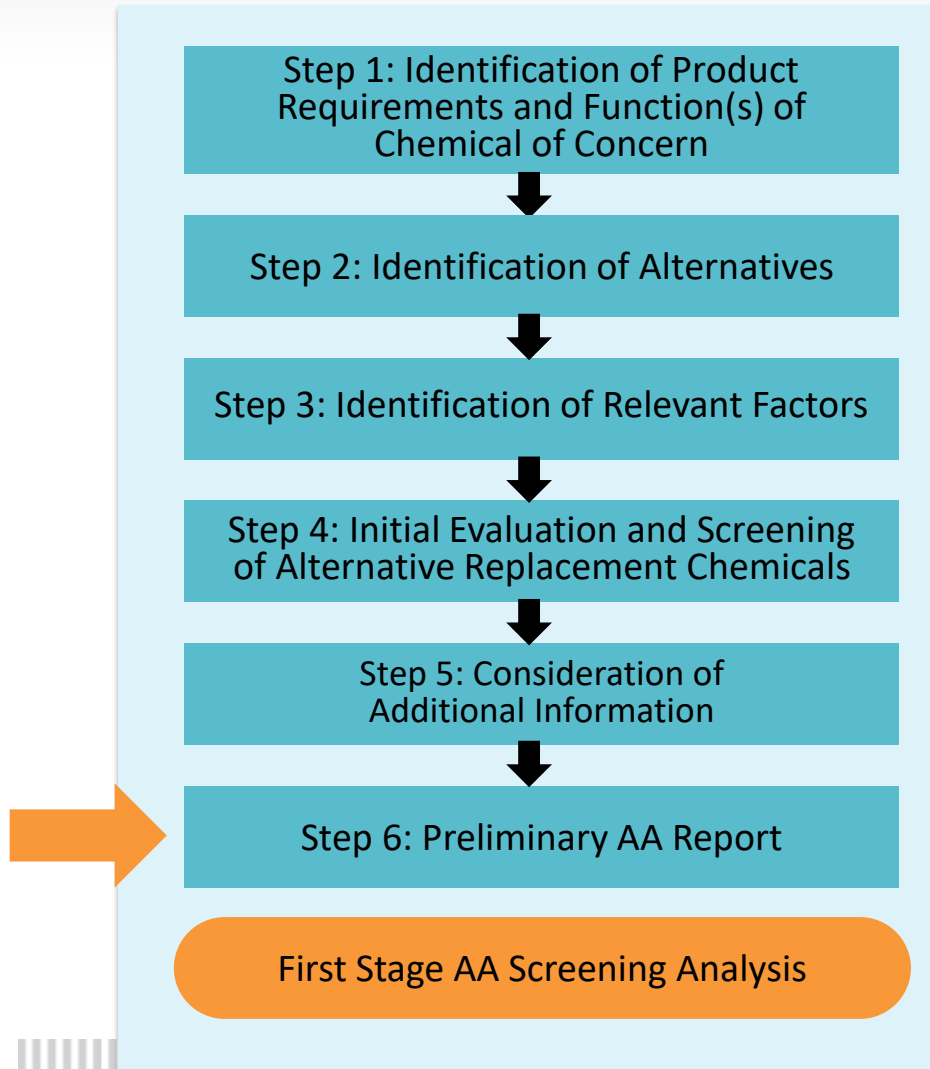


Key Concepts

- Document the rationale to eliminate alternatives
- Flexibility of the AA process



Preliminary Alternatives Analysis – Step 6



Key Concepts

- PAA Report and work plan for the Final AA
- Documentation and transparency



Where to Submit Preliminary AA Report

- [CalSAFER website](#)

- Trade secrets
- Previously submitted PAA Reports
- CalSAFER training videos



Other Resources

[SCP Alternatives Analysis Resources webpage](#)

- AA Guide (version 1.1)
- AA examples
- Frequently asked questions
- Other AA training videos



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!

