



SAFER  
CONSUMER  
PRODUCTS

SCP | COMPLYING WITH  
TRAINING | PRIORITY PRODUCT  
SERIES | REGULATIONS

# Final Alternatives Analysis (FAA)

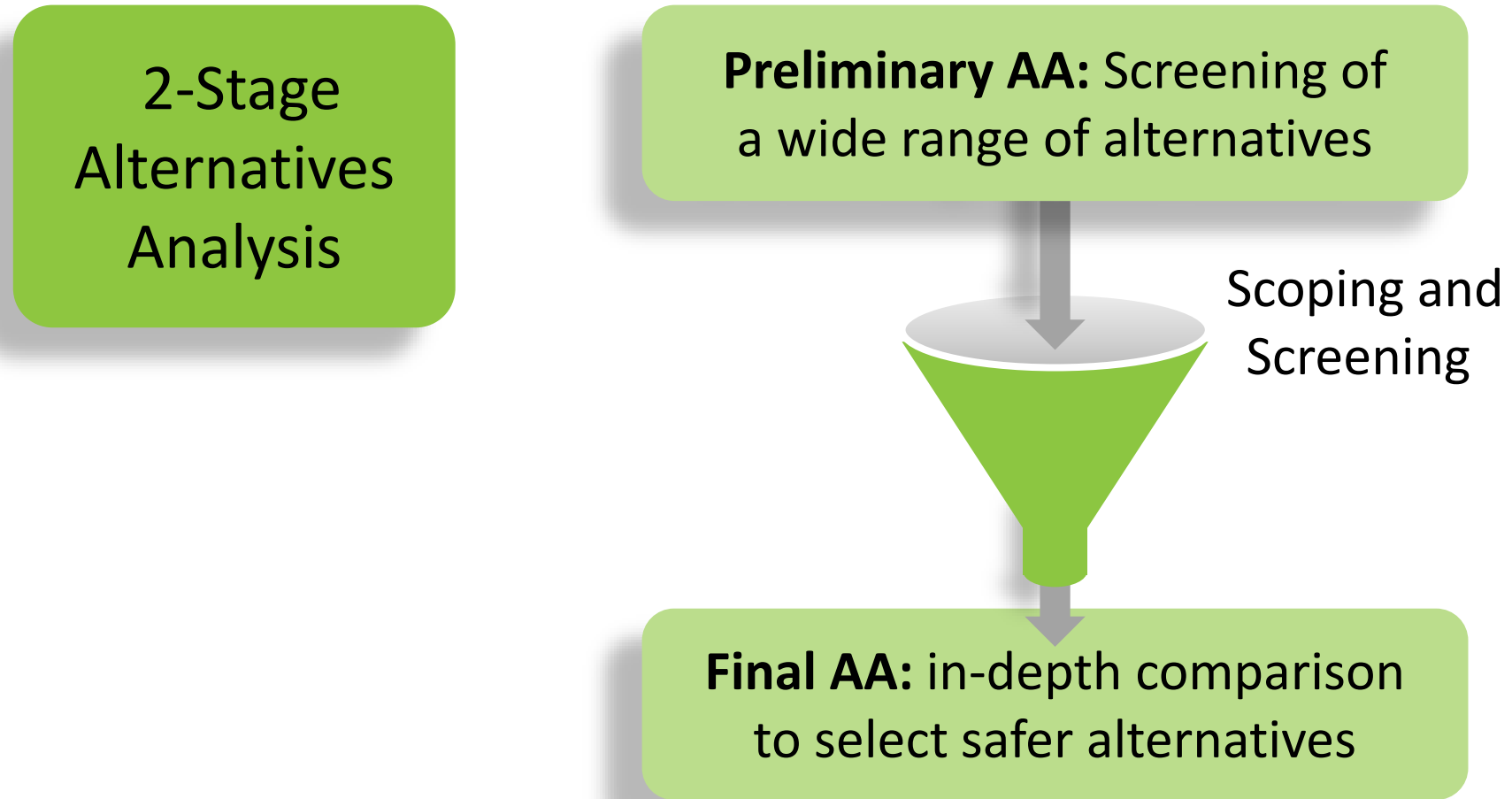


Department of Toxic Substances Control

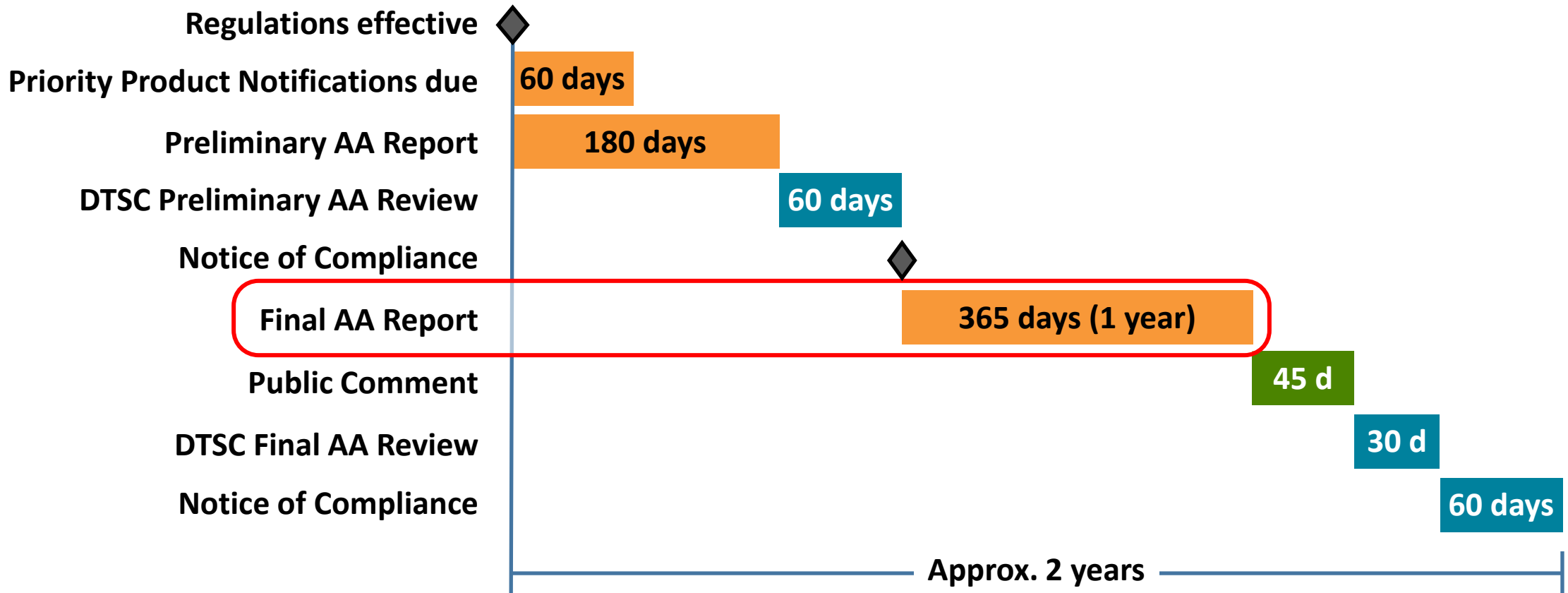


CalEPA

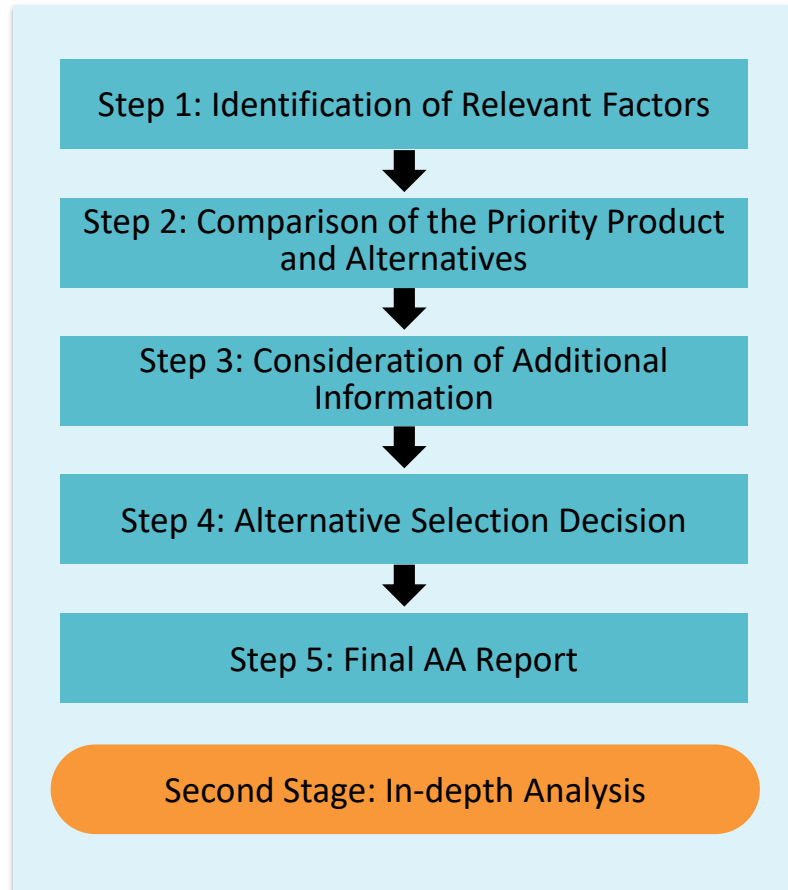
# Two-Stage SCP AA Framework



# Timeline of Report Submission



# Final Alternatives Analysis



## Key Concepts

- In-depth comparative analysis of the alternatives selected in the Preliminary AA (PAA)
- What alternatives are safer and feasible – a trade-off analysis
- Inform selection decision on safer alternative
- Continuous improvement

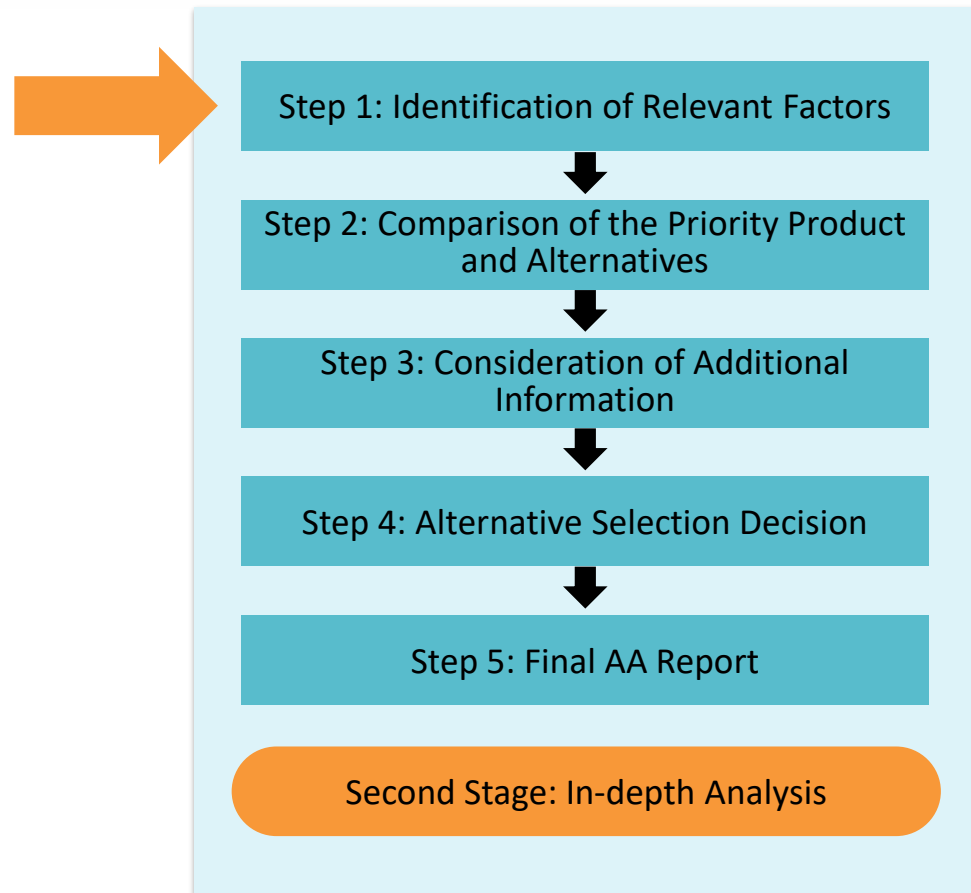


# Leverage with Lessons learned from Others

- Engage subject experts and key players early in the process
- Use the best available data and choose the tools that work best for your situation and consider uncertainties
- Incorporate life cycle thinking and systematic thinking to address trade-offs (hazard, exposure, life cycle impacts, technical performance, internal and external cost)
- Focus on transparency and documentation = show your work!



# FAA Step 1: Identification of Relevant Factors

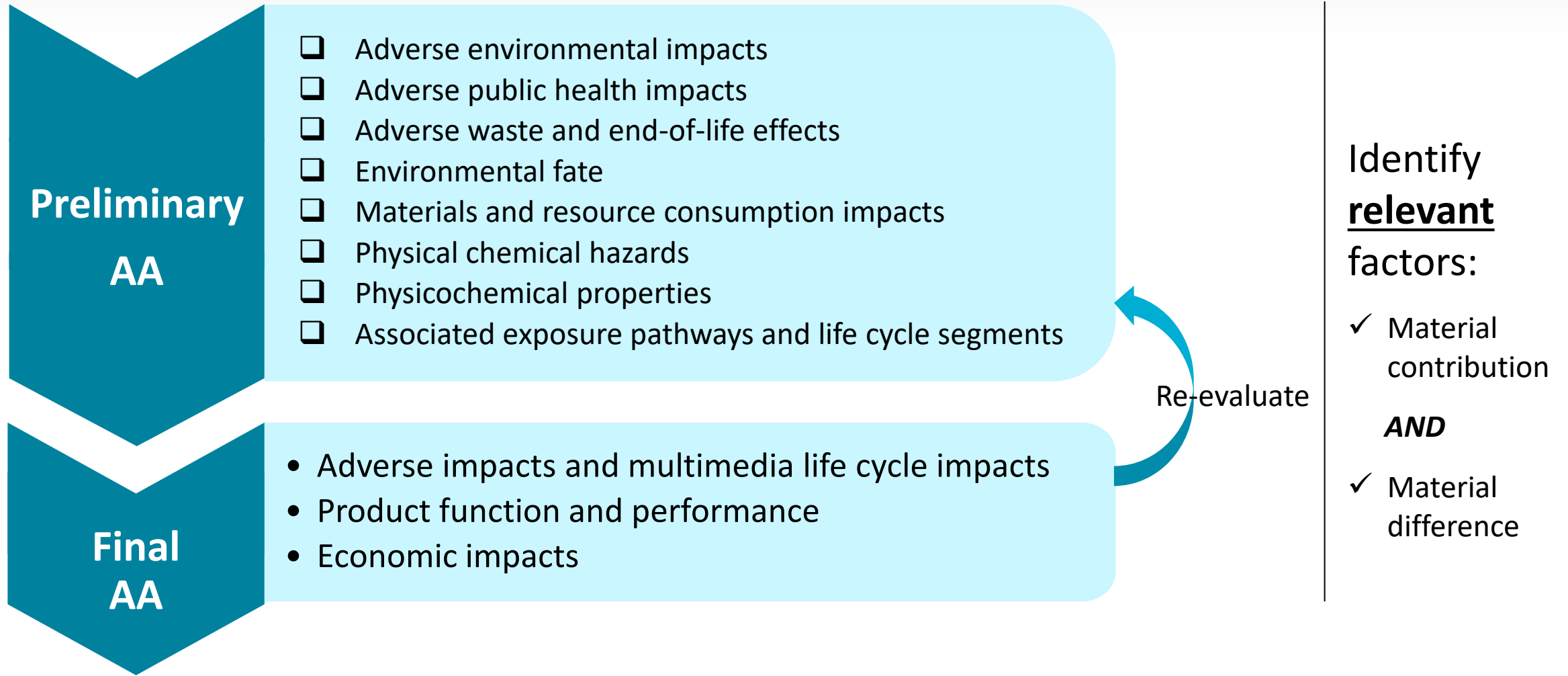


## Key Concepts

- Re-evaluate relevant factors identified in the Preliminary AA
- Consider additional factors in the Final AA
- DTSC guidance document – SCP AA Guide



# FAA Step 1: Identification of Relevant Factors (continued)



# Re-evaluate relevant factors identified in the PAA

**Adverse Environmental Impacts**

**Adverse Public Health Impacts**

**Adverse Waste and End-of-life Effects**

**Environmental Fate**

**Materials and Resource Consumption**

**Physical Chemical Hazards**

**Physicochemical Properties**

Domestic Animal Toxicity

Eutrophication

Impairment of waste management organisms

Loss of genetic diversity, including biodiversity

Phytotoxicity

Wildlife development impairment

Wildlife growth impairment

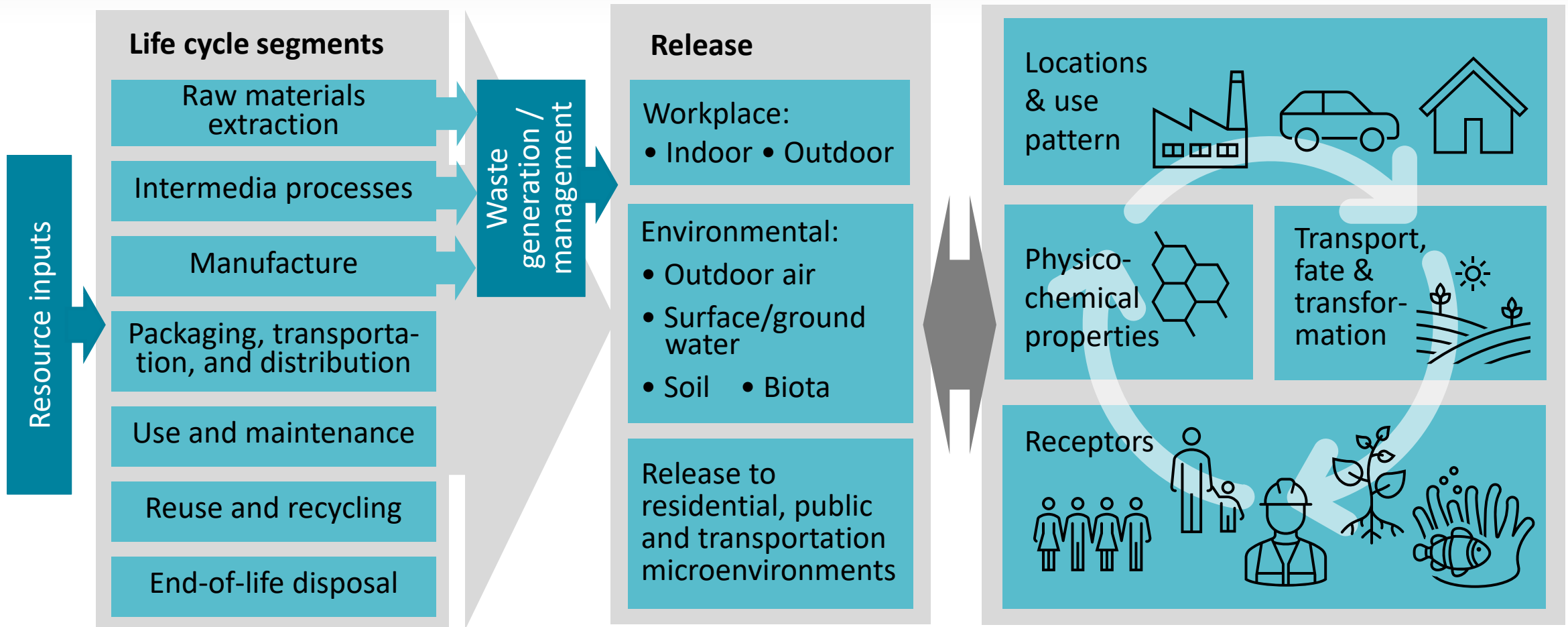
Wildlife reproductive impairment

Wildlife survival impairment





# Relevant factors associated with exposure and life cycle



# FAA Step 1: Identification of Relevant Factors (review)



# Additional factors requiring consideration in the FAA

## Product Function and Performance

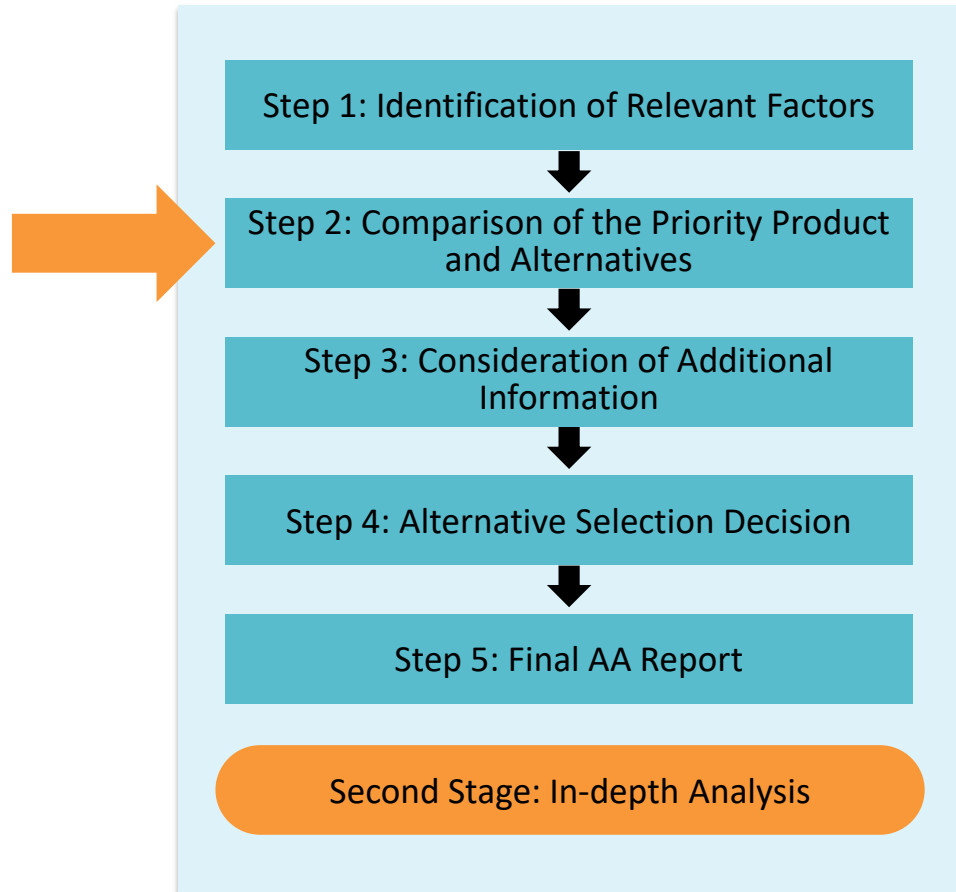
- Principal manufacturer-intended uses or applications
- Functional and performance attributes, and relative function and performance
- Applicable legal requirements
- Useful life of the product
- Whether an alternative exists that is functionally acceptable, technically feasible, and economically feasible

## Economic Impacts

- Public health and environmental costs
- Costs to governmental agencies and non-profit organizations that manage waste, oversee environmental cleanup and restoration efforts, and/or are charged with protecting natural resources, water quality, and wildlife
- Internal cost impacts



# FAA Step 2: Comparison of the Priority Products and Alternatives



## Key Concepts

- Use available information and analytical tools
- Comparative analysis
- Use the same relevant factors for comparison
- Show your work



# FAA Step 2 (cont.): Example Summary Table

Comparison of Adverse Public Health Impacts

	Raw Materials Extraction	Intermediate Materials Process	Manufacturing	Packaging and Transportation	Use	End of life
Priority Product	◆	✦	✦	●	✦	▲
Alternative 1	✕	◆	▲	●	◆	✕
Alternative 2	✦	✕	◆	●	▲	●
Alternative 3	✕	▲	✦	●	▲	◆



High impact



Medium impact



Low impact



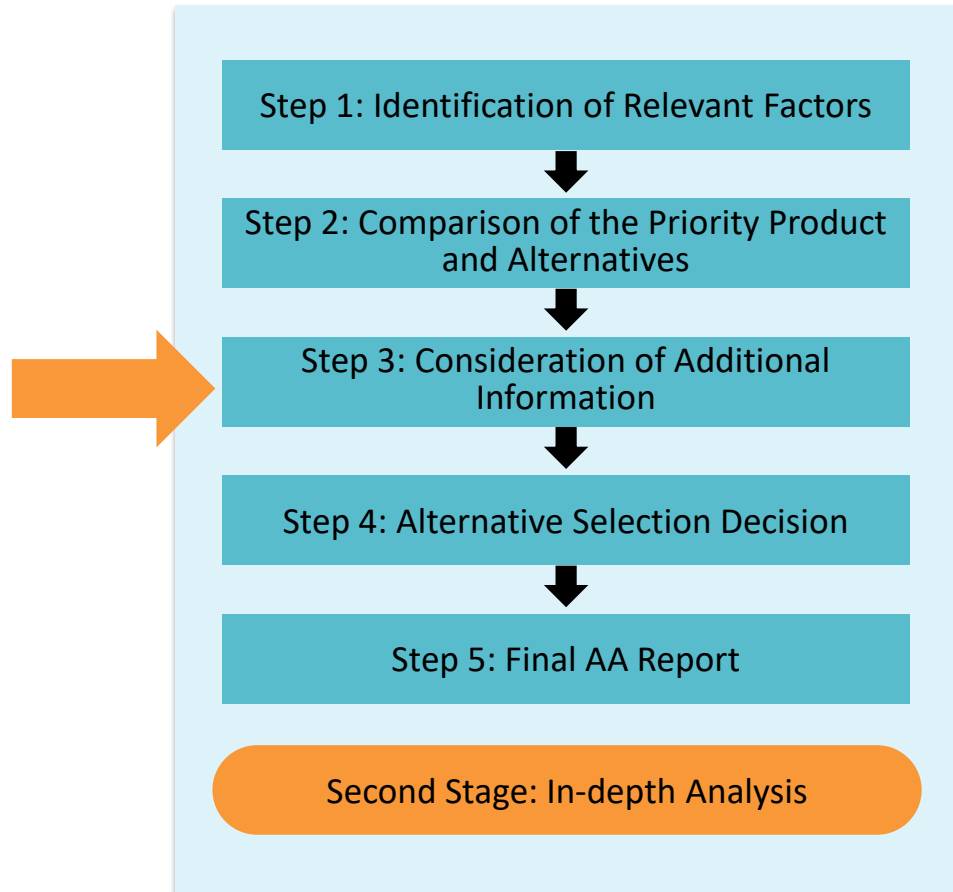
Impact not quantifiable (limited data available)



Data not available



# FAA Step 3: Consideration of Additional Information

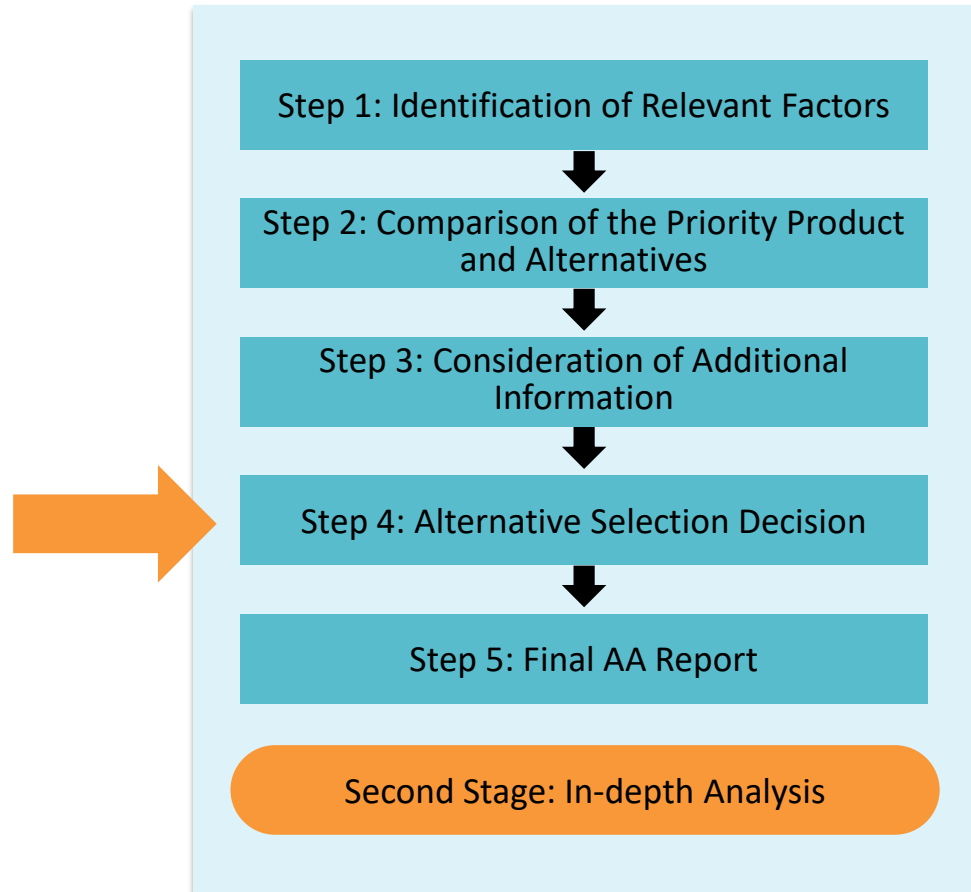


## Key Concepts

- This is an optional step.
- You may consider other relevant information not identified in the previous steps.
- This may include (but is not limited to) reconsideration of the factors and information that were identified in the Preliminary AA.



# FAA Step 4: Alternative Selection Decision



## Key Concepts

- Select the “safer” alternative, not the “safest” or “safe” one
- Support your decision with the comparative analysis



# FAA Step 4: Alternative Selection Decision (cont.)

Initial list of alternatives from the PAA

- Re-evaluate relevant factors identified in the PAA
- Consider and identify relevant factors required in the FAA

Comparative analysis of the Priority Product and alternatives

Adverse impacts and multimedia life cycle impacts  
• Hazard • Exposure • Life cycle impacts

Performance and function

Economic impacts

Additional information (optional)

Decision-making analysis (need to explicitly indicate decision-making approaches and decision rules)

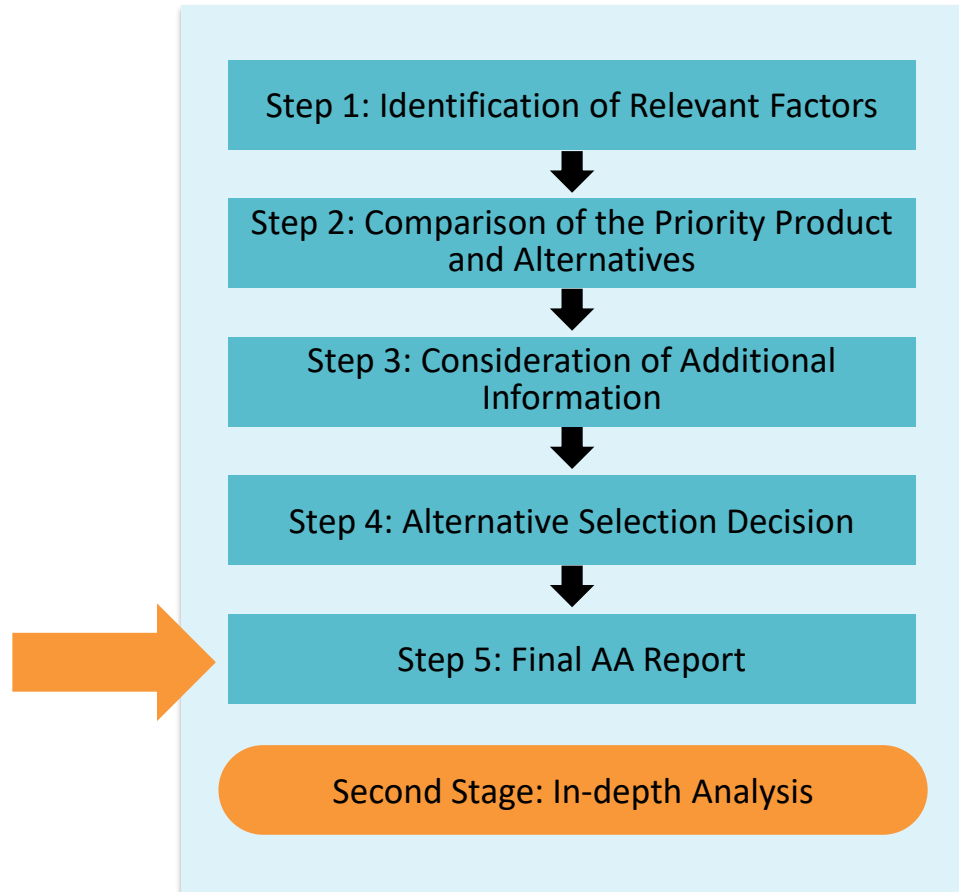
Final selection of alternative(s)

Retain the Priority Product



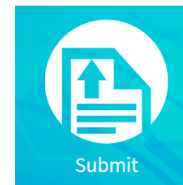


# FAA Step 5: Final AA Report



## Key Concepts

- Documentation and transparency
- [CalSAFER](#), web portal to submit AA Reports



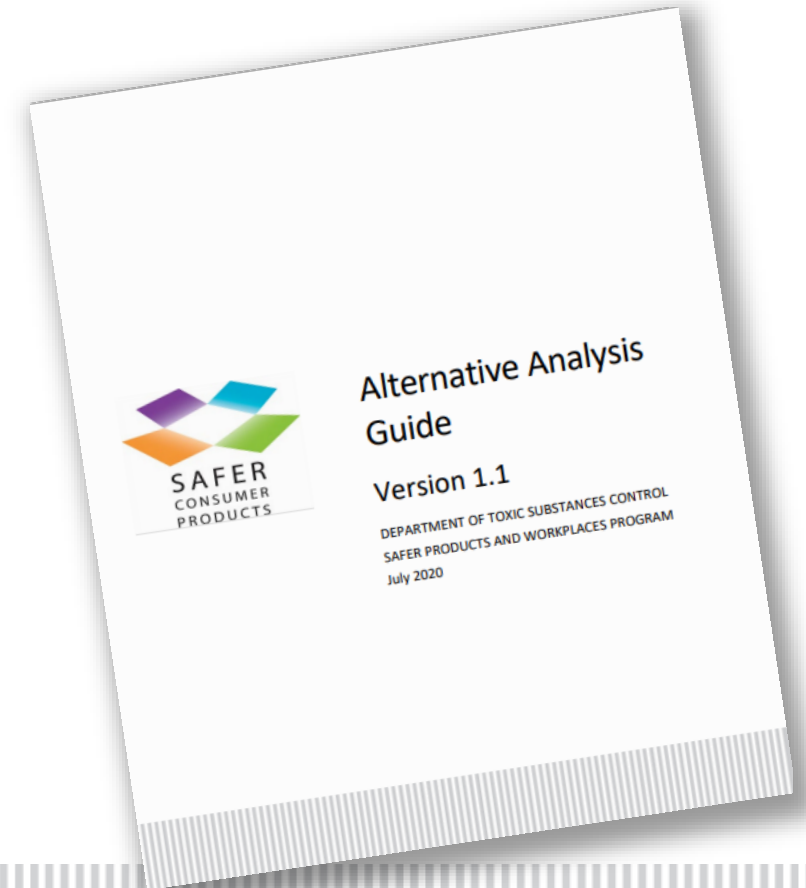
# FAA Step 5: Final AA Report Requirements

- 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 Alternative(s)
- Work Plan and Implementation
- Bibliography/ References



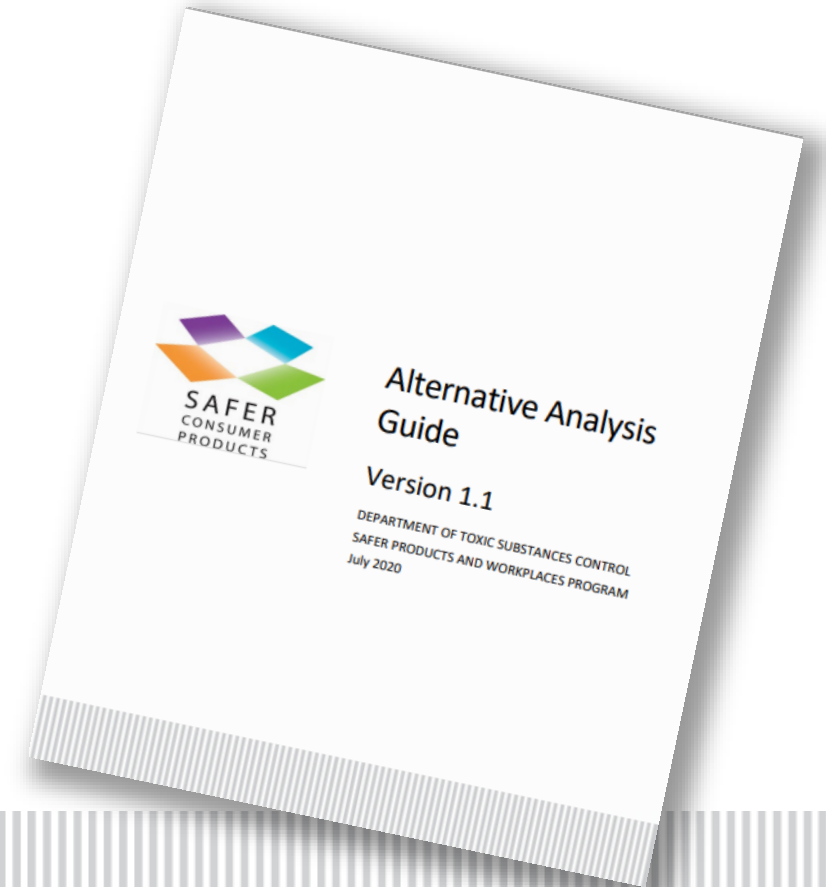
# Other Resources

- [SCP Alternatives Analysis Resources webpage](#)
  - AA Guide (version 1.1)
  - AA examples
  - AA Report templates
  - Frequently asked questions
  - Other AA training videos



# AA Guide

- Approaches to identify viable alternatives
- Advisory resource book to identify relevant factors and research potential impacts
- Tools, databases, and examples for:
  - Hazard assessment
  - Qualitative or comparative exposure assessment
  - Investigate impacts across the product life cycle
  - Economic impact analysis
  - Trade-off analysis and decision making



## 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](mailto:SaferConsumerProducts@dtsc.ca.gov)

**Thank you!**

