

Alkylphenols & Ethoxylates Research Council

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APERC Urges Risk-Based Evaluation of NPEs Under California Safer Consumer Products Program

The Alkylphenols & Ethoxylates Research Council (APERC) fully supports both the intent of the [California Safer Consumer Products Regulations](#) to promote the use of safer alternatives for hazardous ingredients in consumer products, and the mandate that the Safer Consumer Products program focus on [Priority Products](#) that pose “significant and widespread adverse impacts” in the state of California.

In California, designation of a [Priority Product](#) sets into motion a process of state-mandated alternative assessment and product reformulation that is significant and burdensome to both affected businesses and the California Department of Toxic Substances Control (DTSC). Recognizing this, the Safer Consumer Product regulations include a provision that “it is necessary to ensure that the limited resources of DTSC, responsible entities, and other interested parties are focused on Product-Candidate Chemical combinations that are of high priority ...” and pose risk of “significant and widespread adverse impacts” in California. In support of this goal, APERC urges the use of a Priority Products assessment process that is anchored in a strong science-based understanding of the hazards and an assessment of exposures in California that is based on the principles of risk assessment.

It is APERC’s view that the DTSC discussion document [Product-Chemical Profile for Nonylphenol Ethoxylates in Laundry Detergent](#) overstates the persistence and bioaccumulation potential of NPEs and their degradants. NP and NPE are not persistent or bioaccumulative and this has been confirmed in various governmental assessments specific to these properties and in risk assessments generally. Also, the discussion document is not sufficiently grounded in the principles of risk assessment to justify a concern that “significant or widespread adverse impacts” exist in California due to exposures to nonylphenol ethoxylates, or their environmental degradants, from their use in laundry detergents or any other product.

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The Alkylphenols & Ethoxylates Research Council has been in existence for over 25 years and is composed of manufacturers and processors of alkylphenols and alkylphenol ethoxylates, including Nonylphenol and Nonylphenol Ethoxylates. Its mission is to promote the safe use of AP and AP derivatives through research, product stewardship and outreach efforts, within the framework of responsible chemical management.