



December 3, 2010

California Department of Toxic Substances Control
Office of Legislation & Regulatory Policy
Jeff Woled, MS 22A
P.O. Box 806
Sacramento, CA 95812

RE: SAFER CONSUMER PRODUCT ALTERNATIVES
Department Reference Number: R-2010-05
Office of Administrative Law Notice File Number: Z-2010-0908-01

To Whom It May Concern:

On behalf of the American Apparel & Footwear Association (AAFA) – the national trade association of the apparel and footwear industries, and their suppliers – I am submitting these comments relating to the above-captioned item, in which the Department of Toxic Substances Control (DTSC) is proposing to adopt regulations, by January 1, 2011, that would establish a process to evaluate, report on, and manage the use of chemicals of concern in consumer products sold in California.

AAFA's members include numerous companies that design, manufacture, distribute, and sell apparel and footwear in California. Collectively, they employ thousands of people throughout California.

As we noted in previous comments, we wish to stress our association's support for the broad goals of the Safer Consumer Product Alternatives Regulation to develop tools that will assist companies in their ongoing efforts to ensure that they make and market safe consumer products, and to ensure that consumers are aware of and have confidence in these efforts.

AAFA and its members feel regulations can be most effective only when they are transparent, predictable and clear. For this reason, AAFA has signed on to and fully supports the comments from the Green Chemistry Alliance (GCA) submitted under this request for comment. GCA's comments accurately capture the concerns of our industry within regard to the transparency, predictability, and clarity previously mentioned. We urge you to consider the comments from the GCA as you continue the regulatory process.

We appreciate the opportunity to comment on these rules and the Department's consideration of these comments. AAFA and its members look forward to continued dialogue on this important matter. For further information, please contact me at slamar@apparelandfootwear.org or 703-797-9041.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Lamar". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen Lamar
Executive Vice President