

**Safer Choice and Design for the Environment (DfE) Programs' Potential Expansion into
New Product Categories**

Summary of Comments

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1. Document overview

This document is a summary of public comments received on EPA's proposed expansion of its Safer Choice and/or Design for the Environment (DfE) programs to certify products in additional categories beyond cleaners and disinfectants. EPA solicited public input through a Federal Register notice (88 Fed. Reg. 48463) on July 24, 2023, and held a public webinar on August 29, 2023.

The Agency is considering all responses to the July 24 request for comment as it continues to explore a potential expansion of the programs. As noted in previous communications, EPA is weighing several factors when determining which sectors to pursue, including:

- Potential human health and environmental impact of the sector;
- Potential to advance environmental justice¹ in the sector;
- Potential to address per- and polyfluoroalkyl substances (PFAS) in the sector;
- Functional uses of chemicals typically used in the sector (e.g., colorants, surfactants);
- Number of chemicals used in the sector included in EPA's Safer Chemical Ingredients List (SCIL); and
- Disposal and other life-cycle considerations.

EPA received 1,528 comments in response to the solicitation and appreciates the interest in this topic. EPA has summarized comments, organized by topic area, in sections 2-6 of this document. This summary is meant to represent the comments and does not reflect EPA positions.

Appendix A lists the comment index numbers and the commenter(s) for all comments received. Throughout this document, comment index numbers are cited at the end of each topic as sources; comment references are not exhaustive. EPA references individual commenters throughout but acknowledges there are instances where one comment represents multiple people or groups.

EPA thanks the commenters for their recommendations and input. The Agency is exploring product categories its Safer Choice and/or DfE programs will certify. As EPA makes determinations on the expansion of the Safer Choice and/or DfE programs, EPA will, at a minimum, make stakeholders aware of the change through the [Safer Choice](#) or [DfE](#) websites.

¹ EPA defines environmental justice as “the just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment.” [Visit EPA's website for more information on environmental justice.](#)

2. Overview of comments received

In response to EPA's request for input on the Safer Choice and DfE programs' potential expansion of their certification to new product categories, EPA received 1,528 comments, 42 of which were from organizations, 169 from private citizens, and 1,310 from four mass mailing campaigns. About 99% of comments received were in support of expansion of the Safer Choice and/or DfE programs. About 69% of the comments received were in support of expansion of the Safer Choice program into cosmetics.² About 26% of comments requested EPA certify fertilizers, and about 2% of comments requested EPA certify pesticides under the Safer Choice and/or DfE programs. Many other product categories and program improvements were discussed in the comments as described below.

3. General comments on expanding the Safer Choice and DfE programs

Support

Most (~99%) commenters expressed support for expanding the Safer Choice and/or DfE programs. While most commenters did not explicitly state a preference for expanding Safer Choice versus DfE, commenters generally focused on the Safer Choice program. A few commenters explicitly referenced their support of an expansion of the DfE program for specific product categories.

One commenter noted expanding the Safer Choice program would make it easier to identify and purchase safer products, while enabling brands to market their products to consumers who are increasingly concerned about the safety of ingredients and wary of greenwashing.

Another commenter expressed appreciation for the voluntary nature of the Safer Choice program and the simultaneous focus on product performance, ingredients, and packaging.

Another commenter noted expansion of the Safer Choice program would allow state and local agencies to leverage the program to advance chemical policies and environmentally preferable purchasing.

A few commenters suggested EPA avoid using the DfE logo in new product categories and instead use the Safer Choice label because it's more effective for consumer recognition. One commenter also requested EPA use the Safer Choice label on disinfectant products, which are currently eligible to carry the DfE logo. Another commenter recommended EPA use the Safer Choice label for all product categories, except disinfectants. The commenter stated Safer Choice more clearly communicates the benefits of certified products, versus DfE.

Another commenter noted the Safer Choice program does not have congressional authorization and lacks long-term stability and funding authorization. The commenter suggested EPA work with Congress to secure the program's future given the support for the Safer Choice program from chemical companies, brands, formulators, institutional purchasers, and retail consumers. The commenter noted having a long-

² EPA is using the term "cosmetics" throughout this document. Cosmetics are defined by the [Federal Food, Drug, and Cosmetic Act](#) (FD&C Act) as "articles intended to be rubbed, poured, sprinkled, or sprayed on, introduced into, or otherwise applied to the human body...for cleansing, beautifying, promoting attractiveness, or altering the appearance" [FD&C Act, sec. 201(i)]. EPA has grouped comments about "beauty and personal care products," "cosmetics," and related terms under "cosmetics" in this document.

term, stable source of funding support would encourage and promote even greater participation in the Safer Choice program.

Sources: 0011, 0013, 0015, 0016, 0036, 0215

Oppose

One commenter expressed concerns about the expansion of the Safer Choice and DfE programs, noting it will confuse consumers in a marketplace that does not need more certification standards and would be inconsistent with the National Technology Transfer and Advancement Act of 1995 and OMB Circular A-119, which require agencies to use voluntary consensus standards created by the private sector as an alternative to agency-developed standards when possible. The commenter noted EPA can better serve its mission by providing research to support alignment and harmonization of technical criteria used by existing voluntary consensus standards, including by establishing national technical frameworks and providing lifecycle analyses that all ecolabeling programs can leverage. The commenter also recommended EPA direct its limited resources to executing long-delayed, mission-critical responsibilities such as implementing the Toxic Substances Control Act (TSCA) and regulating PFAS to ensure all products are safer for Americans, not only those that pursue voluntary certification.

Source: 0044

4. Specific recommendations for expanding the Safer Choice and DfE programs

A. Cosmetics

i. Support

1. Consumer products

Many commenters recommended EPA expand the Safer Choice and/or DfE programs to certify cosmetics. While two of these commenters did not specify whether EPA should certify cosmetics under the Safer Choice or DfE programs, the other commenters recommended the Safer Choice program for this product category, with two citing increased consumer recognition of the Safer Choice label compared to the DfE logo as a rationale.

One commenter stated EPA should expand the Safer Choice program to include cosmetics to allow consumers to be more knowledgeable and intentional about reducing their exposures to toxic chemicals in cosmetics. The commenter noted cosmetics have been found to contain chemicals that are toxic and cause health effects such as endocrine disruption, neurotoxicity, and cancer and that many of these chemicals are often not listed in the product ingredients lists. Another commenter noted cosmetics can contain ingredients that are hazardous to human health and the environment, such as phthalates and heavy metals that have been linked to adverse health outcomes such as reproductive and developmental disorders. Another commenter noted concerns of ingredients in cosmetics that are associated with cancer, developmental, and reproductive harm. Another commenter cited their research that suggests cosmetics are a major source of exposure to endocrine disrupting chemicals and asthma-associated compounds. The commenter further noted they tested cosmetics and found chemicals of concern, including phthalates, parabens, cyclosiloxanes, ethanolamines, and UV filters.

Several commenters noted cosmetics have a high exposure potential given their widespread use. One commenter also stated women reported using an average of eight cosmetics per day and that there is evidence cosmetics use is increasing across all genders, races, and ethnicities, with men's use of cosmetics doubling since 2004. Another commenter noted cosmetics have considerable potential impact on all of our lives, due to daily direct exposure from products. Another commenter noted the widespread use of cosmetics among teenagers and women of childbearing age; the commenter further noted toxic ingredients used in cosmetics can also cause larger-scale pollution problems during manufacture and disposal.

Two commenters noted expanding the Safer Choice program to certify cosmetics would make it easier for consumers and retailers to identify and purchase safer products and enable brands to market their products to consumers who are increasingly concerned about the safety of ingredients in cosmetics and wary of greenwashing.

Two commenters suggested EPA consider leveraging recent state legislation to develop specific criteria for cosmetics. Other commenters noted the Safer Choice program provides a positive approach to safer chemistry that complements federal and state efforts to regulate toxic chemicals used in products; these commenters also noted many retailers have developed lists of prohibited ingredients in cosmetics that incorporate EPA's approach to safer alternatives.

Another commenter noted expansion of the Safer Choice program to include cosmetics aligns with multiple Agency priorities and directives, including environmental justice and PFAS (further comments on cosmetics and environmental justice can be found in section 4.A.i.3.). A comment associated with a mass mailing campaign also noted Safer Choice certification of cosmetics would help safeguard people from chemicals like PFAS.

Some commenters noted the market for cosmetics with safer and more transparent ingredients is growing and that EPA's Safer Choice program is a preferred program for analyzing ingredients in everyday consumer products.

A few commenters noted the U.S. Food and Drug Administration (FDA) is not mandated to independently assess potential health risks from cosmetic ingredients or products for market entry and has not published a list of recommended ingredients for formulators. Commenters noted the addition of cosmetics into the Safer Choice program, including expansion of the SCIL, could provide an important national pathway for consumers and commercial buyers seeking to purchase safer products.

A few commenters noted cosmetics can contain PFAS. One commenter noted PFAS are commonly added to cosmetics to increase their durability, make the product waterproof, or to impart texture and stated PFAS have been found in the highest amounts in foundations, mascaras, and lip products.

Sources: 0003, 0010, 0014, 0015, 0017, 0019, 0021, 0023, 0025, 0027, 0028, 0032, 0033, 0035, 0036, 0038, 0040, 0042, 0047, 0048, 0107, 0110, 0215

2. Salon-grade products

A few commenters recommended EPA expand the Safer Choice program to certify salon-grade cosmetics. Two commenters noted salon workers, which include low-income women and women of color, tend to be exposed to the most harmful cosmetics and spend more than 40 hours a week using these chemicals, often without personal protective equipment or ventilation. The commenters noted while there are limited third-party verifications for consumer-grade cosmetics, there is no third-party

verification or trusted authority vetting the safety of salon products that salon workers can turn to for product suggestions. One commenter noted products such as eyelash adhesive, nail glue, nail polish remover, nail polish, hair straightening products, hair dye, and disinfectants for cleaning tools are of particular concern.

Sources: 0017, 0028, 0030

3. Environmental justice considerations

Many commenters noted the potential impact Safer Choice certification of cosmetics could have on advancing environmental justice. A few commenters noted toxic chemicals in cosmetics disproportionately impact women of color. One commenter noted because exposure to toxic chemicals in cosmetics disproportionately impacts women of color specifically, Safer Choice certification of these products aligns with EPA's commitment to environmental justice by helping reduce disproportionate exposures and adverse health effects.

One commenter cited a study that found African American women were at greater risk of adverse birth outcomes due to exposure to phthalates. The commenter also noted the use of cosmetics that do not contain toxic chemicals will result in less 'down the drain' releases and disposal of toxic chemicals, which is an indirect route of exposure to these toxicants and an environmental justice issue because many waste and treatment facilities reside in communities with environmental justice concerns and communities of color.

A few commenters requested EPA prioritize cosmetics marketed to marginalized communities, who may suffer a disproportionate burden from chemicals of concern in cosmetics while having fewer safer options. One commenter suggested EPA certify cosmetics but focus on a subset of products, such as hair dyes and straighteners, that commonly contain chemicals of concern and represent an opportunity to support women of color. The commenter cited a study that found an elevated breast cancer risk among women who use hair dye and straightening products and noted the risk was 45% higher for Black women. Another commenter recommended EPA consider products preferred by low-income residents, and products preferred by specific cultural groups for which there are hazardous chemical concerns (e.g., mercury in skin-lightening creams).

Commenters associated with a mass mailing campaign noted a federal standard for cosmetics that consumers can trust is one step of the solution for addressing the disproportionate health effects on communities of color.

Another commenter cited their research suggesting cosmetics are a major source of exposure to endocrine disrupting chemicals and asthma-associated compounds. The commenter stated they tested haircare products used by Black women and found 45 endocrine disrupting or asthma-associated chemicals, such as cyclosiloxanes, parabens, nonylphenols, and phthalates, including in products marketed for children. The commenter stated higher levels of parabens and diethyl phthalate have been found in biomonitoring samples from Black women compared with White women. The commenter also cited their research on cosmetics used by Black women and Latinas living in California, which showed daily use products like shampoos, body lotions, and facial creams contain formaldehyde-releasing agents.

Sources: 0014, 0015, 0017, 0019, 0021, 0023, 0027, 0035, 0047, 0215

4. Considerations for the SCIL

One commenter noted several groups of chemicals known to be toxic to human health that are found in cleaning products are also found in cosmetics. The commenter provided the example of phthalates used in fragrances that are used to formulate both cleaning products and cosmetics. Another commenter noted cosmetics contain many of the functional chemical classes on the SCIL, which could be leveraged by formulators interested in Safer Choice certification. Another commenter noted the SCIL has a functional use class called "Skin Conditioning Agents," noting there is already a start to functional classes of ingredients on the SCIL related to cosmetics.

Two commenters suggested expanding the SCIL to include ingredients in cosmetics would greatly benefit industry—beyond companies pursuing certification—by providing a trusted source of safer alternative ingredients in these products. Two commenters noted if the Safer Choice program certified cosmetics, this would expand the SCIL to be increasingly representative of the chemical landscape relevant to the industry.

Sources: 0021, 0025, 0027, 0038, 0042, 0215

ii. Oppose

Two commenters recommended against EPA certification of cosmetics because they are regulated by FDA.

One commenter noted Safer Choice certification of cosmetics could potentially distract much needed attention and resources from FDA's implementation of the Modernization of Cosmetics Regulation Act of 2022 (MoCRA) and undermine consumer confidence in FDA's oversight of cosmetic products at a time when they should be reassured given the historic nature of MoCRA's enactment and implementation. The commenter noted consumers have long understood that FDA regulates cosmetics and that seeing an EPA Safer Choice label on a cosmetics product could cause them to erroneously believe that some cosmetics (labeled) are inherently safer than others (unlabeled).

In addition, the commenter noted EPA has not evaluated cosmetics under the Safer Choice program in the past and may not have the requisite experience in assessing these products, including sector-specific safety evaluation techniques and resources. The commenter noted Safer Choice certification of cosmetics may cause consumer confusion or even misinformation, which would risk simultaneously devaluing the program.

The commenter also requested clarification on the potential expansion of the Safer Choice program. The commenter asked whether EPA is proposing to expand the existing standard ("Products designed for dermal contact") to include "rinse off" cosmetics, or simply encouraging cosmetics companies to participate in the program. The commenter urged EPA to provide an additional notice and comment period for any specific changes it proposes to make to the Safer Choice program to allow stakeholders to provide input on specific proposed changes. The commenter also asked whether EPA and FDA entered into a Memorandum of Understanding (MOU) or otherwise agreed to what FDA's role might be under an expanded Safer Choice program that includes cosmetics. The commenter cited provision 4.5 of the Safer Choice Standard "Products designed for dermal contact" that notes EPA would consult with FDA in advance of implementing the provision. In addition, the commenter asked whether EPA foresees the need for a "second" label or a clarifying statement – in addition to the Safer Choice label – stating that FDA has not reviewed the product under this program. The commenter noted there is limited space on

cosmetics labels and that companies may not apply for Safer Choice certification if additional label space is needed to accommodate clarifying statements.

Another commenter noted expansion into new product categories that would include items such as over the counter (OTC) drugs, OTC drug and cosmetic combination products, and dietary supplements could interfere with current regulations regarding the manufacture, distribution, and sale of these products and cause consumer confusion. The commenter suggested using the Safer Choice label on OTC drugs and supplements may be confusing to consumers as it would imply that one product is safer than another or that one product is unsafe. The commenter also noted it would be inappropriate for a government agency without any regulatory authority over a product to assess it for safety using only certain limited criteria and to allow that product to bear a label stating that it is “safer” than others.

Sources: 0020, 0216

B. Fertilizers and soil amendments

Many commenters recommended EPA expand the Safer Choice and/or DfE programs to certify fertilizers and/or soil amendments.

Many commenters, including those associated with a mass mailing campaign, stated while EPA’s Safer Choice and/or DfE programs do an admirable job of performing alternative analyses on chemicals and identifying chemicals that are less hazardous, they do not identify systems where organic methods could be used. Many commenters stated chemical fertilizers consist of highly soluble chemical salts that feed plants directly but harm soil microorganisms, while organic systems feed plants by releasing organisms to the soil.

Many commenters stated chemical fertilizers contribute to climate change and undermine efforts to mitigate climate change because they are produced with fossil fuels and limit the ability of soil to sequester carbon. Many commenters also encouraged EPA to evaluate fertilizer for compatibility with natural systems and to protect soil organisms, plants, waterways, and human health.

Many commenters noted EPA encourages the use of biosolids, many of which are marketed as organic fertilizers, but that biosolids are making people sick; introduce resistant bacterial and viral strains; contaminate drinking water; expose crops, livestock, and people to pharmaceuticals, PFAS, and other harmful compounds; and contribute to plastic in the soil. Additionally, many commenters noted the Organic Materials Review Institute (OMRI) seal helps people avoid chemical fertilizers and biosolids but that it does not provide information on source materials, which can be contaminated with antibiotics, antibiotic resistance genes, pesticide degradants, and heavy metals. The commenters suggested the Safer Choice label could offer an additional indicator of safety.

One commenter urged EPA to list phosphorous, nitrogen, potassium, nitrate, and metals on fertilizer labels along with potential contaminants like PFAS, PCBs, pharmaceuticals, or phthalates.

Sources: 0010, 0045, 0046, 0049, 0050, 0051, 0052, 0054, 0055, 0056, 0057, 0059, 0060, 0061, 0062, 0063, 0065, 0066, 0067, 0068, 0069, 0072, 0073, 0075, 0076, 0077, 0078, 0079, 0081, 0082, 0085, 0086, 0087, 0088, 0089, 0093, 0096, 0097, 0098, 0100, 0103, 0104, 0105, 0114, 0123, 0125, 0126, 0128, 0132, 0136, 0137, 0138, 0141, 0144, 0151, 0153, 0155, 0156, 0158, 0159, 0163, 0165, 0166, 0167, 0168, 0170, 0171, 0172, 0173, 0174, 0175, 0176, 0178, 0179, 0180, 0185, 0186, 0188, 0191, 0192, 0194, 0195, 0196, 0197, 0199, 0201, 0202, 0203, 0204, 0205, 0209, 0210, 0212, 0213, 0214

C. Pesticides

Many commenters recommended EPA expand the Safer Choice and/or DfE programs to certify pesticide products.

One commenter noted including pesticides in the Safer Choice and/or DfE programs would benefit consumers by enabling them to identify pesticides that pose the least risks and would help drive innovation in the pesticide industry to develop effective products with safer ingredients.

One commenter recommended EPA expand DfE's scope to include all pesticides, not just disinfectants, with a specific focus on products most used in or around the home and in places where children are more likely to be exposed. The commenter requested EPA include criteria designed to protect children most vulnerable to pesticide exposures, consider the likelihood of increased exposures in response to the climate crisis, and include climate criteria for pesticide products.

A few commenters stated while the Safer Choice and/or DfE programs identify less hazardous chemicals, the programs do not identify systems that make chemical inputs unnecessary. For example, the commenters stated substituting a less toxic pesticide is not the same as switching to available organic methods. Commenters associated with a mass mailing campaign stated EPA could determine the registration of a toxic substance to be unreasonable if alternative practices and products identified by the Safer Choice program are available. The commenters also noted the U.S. Department of Agriculture's (USDA's) National Organic Program could have a larger impact if EPA recognized that pesticide uses are unreasonable if the goals of the use could be met by organic methods.

One commenter noted biopesticides have been recognized as a lower-risk pesticide category by EPA. The commenter stated biopesticides appear to be nominally eligible for the DfE logo but that none have been certified to date. The commenter stated EPA could update and expand the DfE program to fully encompass biopesticides.

Sources: 0010, 0014, 0029, 0030, 0034, 0045, 0054, 0064, 0067, 0095, 0097, 0112, 0113, 0134, 0140, 0182, 0184, 0211

i. Adjuvants for pesticide products

One commenter recommended EPA expand the DfE program to include adjuvants, chemicals designed to improve the performance of a pesticide that are sold separately and mixed with the pesticide prior to application. The commenter stated several adjuvants are already listed on the SCIL and, because adjuvants are intended to be mixed with a pesticide prior to use, they are disposed of in the same fashion as products already certified under EPA's DfE program.

The commenter stated there is a need for DfE-certified adjuvants that can be used flexibly across many different pesticide registrations because companies may look to use the same pesticide combined with different adjuvants across different geographies to comply with adaptable pesticide application requirements that differ by geography due to Endangered Species Act obligations and other environmental mitigation requirements. The commenter noted the availability of DfE-certified adjuvants would give purchasers more visibility into adjuvants that meet EPA's rigorous requirements and help them achieve geographic flexibility, as needed, while protecting human and environmental health.

Source: 0034

ii. Minimum risk pesticides

Two commenters recommended EPA expand the DfE program to include “minimum risk pesticides.”³

One commenter noted concerns regarding human and environmental health impacts from pesticides, particularly in underserved communities that experience disproportionate human health or environmental burdens. The commenter noted offering minimum risk pesticides to such communities could help relieve part of their daily chemical burdens.

The commenter stated minimum risk pesticides, including topical parasite treatment products for animals and pets, are disposed of in a similar fashion as the antimicrobial products that DfE already certifies. The commenter also stated the functional uses of typical minimum risk pesticide active and inert ingredients are similar or identical to those of chemicals typically used in DfE-certified antimicrobial products and that ten active ingredients and at least 102 inert ingredients are already on the SCIL.

In addition, the commenter noted while minimum risk pesticides should not contain PFAS, except potentially as impurities, concerns have been raised regarding the presence of PFAS in plastic packaging used for pesticides. The commenter stated a PFAS-free pesticide certification would have market value, provide clarity for buyers, and encourage product manufacturers seeking the certification to conduct due diligence throughout their supply chain.

The commenter stated DfE certification of minimum risk pet pesticide products would give pet owners more opportunity to find and select products that keep their pets healthy as well as meet stringent EPA criteria for efficacy and human and environmental health.

Sources: 0029, 0034

D. Paints, coatings, and sealants

Many commenters recommended EPA expand the Safer Choice and/or DfE programs to certify paint products, including paints, sealants, coatings, paint strippers or removers, graffiti removers, lubricants, and remanufactured paint. Two commenters noted retailers would like to see the program expand to include this product category.

Two commenters stated many chemicals found in paint fall into functional classes of chemicals already included on the SCIL, such as solvents, and that adding this product category could leverage existing program resources. One commenter also noted paint strippers can contain chemicals undergoing review under TSCA and that including paint products in the Safer Choice program would complement efforts by the California Safer Consumer Products program, incentivize manufacturers to have ingredients evaluated, and support the development of safer chemicals.

Several commenters noted how paint products expose workers and consumers to PFAS or other chemicals of concern. Some commenters also noted the human and environmental health risks of PFAS. Two commenters noted a report by the Healthy Building Network found that 50% of paint products

³ EPA has determined that certain “minimum risk pesticides” pose little to no risk to human health or the environment. If a pesticide meets [these six conditions outlined by EPA](#), it is considered minimum risk and is exempt from the requirement that they be registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (i.e., the pesticide product does not need to be registered with EPA). However, states may require registration of minimum risk pesticides. [Visit EPA’s website to learn more.](#)

tested were positive for fluorine, which is a potential indicator for PFAS, but that few or no PFAS-free certifications currently exist. One commenter urged the Safer Choice program to do more to test products they certify and adopt a test standard like Oeko-Tex. Another commenter explained PFAS and other chemicals may be emitted from products at all stages of their life cycles and that they often are found in indoor air and dust, thus exposing building occupants. The commenter stated expanding the Safer Choice program to the formulated building products sector would impact a large and growing industry in the United States and that there is demand for safer formulated building products driving development of new products. Another commenter noted PFAS have health effects, including hormone system disruption, risk of cancers, decreased fertility, and elevated cholesterol and contaminate bodies of water and bioaccumulate in fish and wildlife.

In addition to PFAS, several commenters noted paint products are a source of other toxins and chemicals of concern. One commenter noted paint washed from application equipment is a source of microplastics into the environment. One commenter noted paint can be a source of volatile organic compounds (VOCs), which can harm the human respiratory system. One commenter explained phthalates can be emitted from sealants and paints at all stages of their life cycles and that studies have found phthalates in indoor air and dust because of their use in building materials. The commenter stated that their own research, in partnership with Healthy Building Network and the Ecology Center of Michigan, found high levels of phthalates in 6 of 33 sealants tested but that the absence of phthalates in 27 products suggests there are alternatives available. Another commenter stated paint removers historically used dichloromethane (DCM) and n-methyl pyrrolidone (NMP), which are carcinogens, before many retailers voluntarily restricted their use. The commenter noted many manufacturers reformulate their products by replacing DCM with regrettable substitutions such as dimethyl formamide, ethyl benzene, methanol, naphtha, naphthalene, Stoddard solvent, toluene, and xylene.

Several commenters emphasized the availability of safer paint products would be impactful because paint products are widely used by residents and businesses, and the construction, adhesives, and sealants industries are growing. Several commenters also discussed the environmental justice implications of paint products. Several commenters noted paint products are widely used by underserved, low-income, or marginalized communities who are more vulnerable to chemical exposures and environmental injustices. For example, one commenter noted 59.1% of painters and paperhangers are Hispanic or Latino and are already more vulnerable to chemical exposures. Another commenter stated trade professionals, students in occupational trade schools, and do-it-yourself users of paint products often live in communities with environmental justice concerns.

One commenter recommended the Safer Choice program certify products used in buildings and grounds cleaning and maintenance occupations and construction and extraction occupations such as caulks, sealants, glues, and paints because those groups are overrepresented by racial and ethnic minoritized groups where exposures to toxic chemicals have been found or are likely. The commenter noted these occupations can be exposed to organic solvents, toluene, methylene chloride, alkanes C5-C17, and epoxies.

Sources: 0005, 0014, 0015, 0017, 0019, 0024, 0030, 0036, 0039, 0042, 0090, 0108, 0115, 0215

E. Food packaging

Several commenters recommended EPA expand the Safer Choice program to certify food packaging and food contact materials.

One commenter noted food contact materials often contain undisclosed toxic chemicals and that Safer Choice certification of these products would align with EPA priorities, including advancing environmental justice and reducing PFAS exposure. The commenter also noted as consumers become more aware of toxic chemicals in food, demand is growing for transparent, easy-to-comprehend certifications and sustainable packaging. The commenter noted many states have banned PFAS and phthalates in food contact materials, and groups like the Environmental Defense Fund and Food Packaging Forum have compiled lists of chemicals of concern to avoid and reduce in food contact materials. The commenter explained more than 2,800 chemicals have been shown to migrate from food contact materials, including Bisphenol A (BPA), phthalates, and PFAS.

Another commenter stated their own research identified over 1,800 chemicals that migrate from food contact materials and that over 14,000 chemicals have been used in the manufacturing of food contact materials. The commenter stated restricting the use of chemicals and chemical groups such as ortho-phthalates and PFAS could significantly benefit environmental and public health. The commenter suggested EPA prioritize 388 chemicals that the commenter identified in the manufacture of food contact materials that are known to be carcinogenic, mutagenic, toxic to reproduction, persistent and bioaccumulative, or endocrine disrupting, based on the European Union's Chemicals Strategy for Sustainability. The commenter also suggested the Safer Choice program could build on the Safer Products for Washington Program or use the web-based tool Understanding Packaging Scorecard to support expansion of the Safer Choice program to food packaging materials. In addition, the commenter noted including food packaging materials in the Safer Choice program would be an important step in achieving a circular economy, as the use of hazardous chemicals in the manufacture of food packaging would be perpetuated through reuse and recycling. The commenter also noted compostable food packaging could release hazardous chemicals directly into the environment, such as PFAS.

One commenter asked that EPA no longer allow the use of PFAS as a processing aid in the manufacture of polyethylene food packaging as it leaches PFAS into food. This commenter stated P2 Fresh Packaging of Minnesota calls for the use of sustainable food packaging and discontinuing the use of common fossil fuel plastic food packaging (polyethylene [PE], polystyrene [PS], polyethylene terephthalate [PET]). The commenter also stated single use plastic food packaging is not safe for U.S. Soldiers.

Sources: 0008, 0012, 0021, 0033, 0118

F. Assembled products

i. Support

A few commenters recommended EPA expand the Safer Choice program to certify construction materials, building products, and solids, including fiberboard, gypsum panels, wallboard, insulation, and sorbent. One commenter noted there are no comparable certifications for assembled products that use chemicals in their production and are formed into a specific shape for their end use as there are for chemically formulated products. The commenter stated the Safer Choice program already certifies some assembled-type products like disposable cleaning wipes and could build on that expertise to expand the program to other assembled-type product categories, such as industrial and automotive products (e.g., construction materials) and household materials (e.g., wipes and candles). Another commenter stated safer products are desired but that options are confusing for the consumer. The commenter noted labeling for building products should clarify which products are less likely to emit VOCs or contribute chemicals to indoor air and dust.

One commenter suggested the Safer Choice certify assembled-type products like physical and mechanical pesticidal devices (e.g., fly traps). The commenter acknowledged assessing raw materials for assembled-type products is complex and suggested EPA consider looking at other credentialing bodies of assembled products, such as OEKO-TEX Standard 100.

Commenters also recommended the Safer Choice program certify electronic devices, air filters, waste/trash bags, and flooring.

Sources: 0014, 0024, 0029, 0034, 0090, 0118

ii. Oppose

One commenter recommended EPA give priority to formulated products over expanding into articles, materials, and other manufactured items. The commenter stated evaluating articles may require a different methodology, which would pose challenges for hazard assessment and performance evaluation and would potentially strain EPA staff resources.

Source: 0017

G. Microbial-based cleaning products

A few commenters recommended EPA expand the Safer Choice program to certify microbial-based cleaning products.

One commenter stated microbial-based cleaners use active microbes and bacteria to target and break down dirt and grime and can also actively clean for up to seven days after application. The commenter also noted other third-party certification programs have set standards to allow microbial products within certain conditions. The commenter stated the use of microbial cleaning products instead of petrochemicals would further the Biden Administration's goal for the bioeconomy.

Another commenter emphasized the importance of microbial cleaners since they can achieve desirable cleaning performance through biological processes.

Sources: 0007, 0026, 0034

H. Industrial products

Two commenters recommended EPA expand the Safer Choice and/or DfE programs to certify industrial degreasers and cleaners, noting these products are hazardous to human and environmental health. Both commenters noted products in this category expose low-income workers and residents in surrounding disadvantaged communities to toxic materials and that substituting these products would provide an environmental justice benefit.

One commenter stated pipe cement/primer products should be considered for Safer Choice certification because they contain carcinogenic chemicals, commercially available products without these chemicals exist, and a large proportion of users include communities with environmental justice concerns. The commenter stated solvents used in these products are volatile, causing risk of exposure during manufacturing and use phases of the product life cycle.

One commenter recommended several industrial product categories where VOC solvents, toxic solvents, and global warming solvents are used, including industrial water-based cleaners, electronics water-based cleaners, non-halogenated solvents, parts cleaning water-based cleaners, wet cleaning formulations and synthetic hydrocarbons for dry cleaning, and spotting chemicals for use in garment cleaning. The

commenter also noted the Safer Choice program could assist smaller companies without significant resources in choosing safer products.

The commenter noted that for the Safer Choice program to consider certifying more industrially relevant products, several issues would need to be resolved, including VOC content restrictions, concentration, incentives, types of products, changing limitations, and approach to third-party profilers. The commenter suggested the Safer Choice program use VOC limits established by the South Coast Air Quality Management District when evaluating industrial products rather than California Air Resource Board (CARB) VOC limits because CARB is meant for consumer and institutional products. The commenter also recommended EPA consider that most industrial products would not meet the Safer Choice Standard in their concentrated form but may meet the Standard in their recommended dilution range. The commenter recommended EPA work with the U.S. General Services Administration to make the Safer Choice label mandatory for government purchasing to provide additional incentive for manufacturers certify their industrial products, as companies may not see a marketing advantage with the Safer Choice label on industrial products. The commenter also recommended certain chemicals such as acetone and benzyl alcohol be allowed at higher concentrations in industrial products in some circumstances.

Sources: 0005, 0039

I. [Other sectors/categories](#)

Adhesives

Several commenters recommended EPA expand the Safer Choice and/or DfE programs to certify adhesives. One commenter noted retailers have voiced support for the Safer Choice and/or DfE program's expansion to adhesives, including glues and sticks. Another commenter noted adhesives contain PFAS and that unused products should be disposed of as hazardous waste.

Sources: 0005, 0014, 0019, 0090, 0108

Children's Products

Some commenters recommended EPA expand the Safer Choice program to certify children's products, including cosmetics, art supplies, toys, school supplies, backpacks, lunch boxes, paints, dyes, and inks. One commenter noted children are more sensitive to the high concentrations of harmful chemicals and heavy metals that can be found in children's products, so vetted safer products would be valuable for schools, parents, and childcare programs. Another commenter stated retailers would like to see the Safer Choice program expand to school art supplies (e.g., paints, dyes, inks).

Sources: 0014, 0019, 0025, 0033

Personal Hygiene Products

Two commenters recommended EPA expand the Safer Choice program to certify personal hygiene products such as diapers and feminine products. One of these commenters suggested the Safer Choice program certify baby wipes, makeup remover wipes, and tampons. The other commenter suggested EPA certify urinary pads, toilet paper, and tissues to protect women and developing children from harmful exposures as well as environmental and climate impacts.

Sources: 0014, 0110

Air Fresheners

Two commenters recommended EPA expand the Safer Choice and/or DfE programs to certify air fresheners. One commenter noted the complete ingredients in air fresheners are not disclosed to the public due to trade secret protections for fragrances, so it is difficult for consumers to assess chemical exposure from these products.

Sources: 0030, 0118

Automotive Products

One commenter recommended EPA expand the Safer Choice program to certify fuel conditioner, coolants, grease, metal working fluids, and oils (e.g., auto, chain/cable, corrosion preventative, gear, multipurpose, penetrating oils). Another commenter recommended EPA expand the Safer Choice program to certify car products, such as washes, polishes, sealants, and stain treatments. Another commenter recommended EPA expand the Safer Choice program to certify automotive waxes and polishes as well as brake cleaners. The commenter noted workers from marginalized communities are disproportionately exposed to many occupational hazards because they tend to work in industries and occupations associated with use of hazardous products such as break cleaners.

Sources: 0014, 0017, 0090

Clothing and Textile Additives

A few commenters recommended EPA expand the Safer Choice program to certify clothing and textiles. One commenter noted consumer demand for sustainable clothing and accessories has increased and that Safer Choice certification would significantly reduce consumer confusion in this sector and encourage clothing manufacturers to reduce their health and environmental impacts. The commenter noted third-party labels already exist in this space and suggested the Safer Choice program partner with existing third-party labeling groups to bolster their use and visibility. The commenter also suggested the Safer Choice program focus on adoption by brands to reduce fashion's environmental justice impacts here and abroad.

Sources: 0014, 0024, 0118

Pool and Spa Cleaners

Another commenter recommended EPA expand the Safer Choice and/or DfE programs to certify pool and spa cleaners as they often contain hazardous materials such as hypochlorite, muriatic acid, and chlorine that can cause skin irritation, burns, damage to the respiratory system, and death. The commenter noted these products act as disinfectants and alkalinity and pH adjusters and that there are already chemicals with these functions on the SCIL.

Source: 0030

Wastewater Treatment

One commenter recommended EPA expand the Safer Choice program to certify wastewater treatment chemicals. This commenter noted that some chemicals used in wastewater treatment like chitosan are already on the SCIL.

Source: 0042

5. Specific recommendations for enhancing existing product categories and criteria

A. Disinfectants

Two commenters noted the use of disinfectants in salons. One commenter requested the DfE program help salon workers identify safer disinfectants that meet their state board's regulations. The commenter stated most of the common disinfection products found in salons nationwide are either based on chlorine bleach or quaternary ammonium compounds and that these chemicals pose considerable health hazards, which are compounded by the other chemical exposures in salons. The commenter noted providing safer disinfectant recommendations specific for salon worker audiences would be a well-used resource that could reduce harmful chemical exposures in the salon.

One commenter urged EPA to transition antimicrobial products from the DfE logo to the Safer Choice label. The commenter noted EPA's work to rebrand most product categories as Safer Choice benefits all stakeholders. The commenter noted many consumers do not know the difference between the Safer Choice and DfE logos and may be confused by two logos for similar products. In addition, the commenter noted institutional purchasers may not realize they must specify two different logos when creating specifications for janitorial and cleaning product contracts, inadvertently eliminating safer antimicrobial products from the scope of their contracts.

Sources: 0028, 0030, 0215

B. Laundry

Two commenters recommended EPA expand the Safer Choice and DfE programs to certify liquid laundry packets and dissolvable laundry sheets. One commenter noted liquid laundry packets are efficient and sustainable because they decrease raw materials and water used for product formulation and ensure consumers are using the correct measurement of detergent because packets are pre-measured. Another commenter suggested expanding the programs to certify detergent sheets, which are waste-reducing alternatives to plastic bottles of liquid detergent. One commenter suggested EPA evaluate laundry sizing agents because they are used by small businesses and workers.

Sources: 0007, 0017, 0030

C. Wipes

One commenter recommended EPA expand the Safer Choice program to certify sustainable cleaning wipes that are either flushable or biodegradable. The commenter stated this could address problems related to single use wipes that create waste and pollution and clog sewage systems.

Source: 0109

D. Considerations for the SCIL

Two commenters recommended EPA modify the Safer Choice program to allow a higher concentration of acetone in certified cleaning products, such as aerosol brake cleaners and other industrial products. One commenter proposed removing the SCIL functional use class "Specialized Industrial Chemicals" and requested EPA categorize chemicals in this category in a more descriptive class applicable to their use.

Another commenter urged EPA to exclude breast cancer-relevant chemicals from the SCIL, including over 900 that will be identified in a forthcoming scientific publication authored by the commenter. The commenter also suggested the SCIL only include chemicals if they have been tested for inducing of hormone synthesis and estrogen receptor activity and do not show evidence for increasing estradiol or progesterone synthesis or activating the estrogen receptor. In addition, the commenter also stated chemicals should be screened in the complete Organisation for Economic Co-operation and Development (OECD) battery of genotoxicity tests. The commenter noted genotoxicity should be used as a flag for hazard potential since there are gaps in chemical hazard screening and since it is not possible to conduct cancer bioassays on all chemicals under consideration.

Sources: 0005, 0035, 0042

E. Certification criteria

Climate

A commenter noted EPA should consider incorporating climate criteria into the Safer Choice and DfE programs or as an add-on to certification. The commenter explained the climate criteria should include the climate impacts of petroleum-based ingredients as well as the climate impacts of production, packaging, and disposal.

Source: 0014

Packaging

One commenter recommended EPA update its certification criteria to consider the safety of the ingredients, coatings, liners, and other materials used to package its Safer Choice-certified products. The commenter noted these updates would ensure the goals of the Safer Choice program and agency are upheld in light of new information that links contamination of packaging with chemicals such as PFAS and increasing presence of microplastics in humans and the environment.

One commenter recommended EPA consider biobased testing requirements for all naturally sourced or biobased packaging claims in any new biobased product categories included in the Safer Choice and DfE programs. The commenter noted any claims of naturally sourced ingredients or biobased packaging for products should be third-party tested or USDA BioPreferred certified.

Sources: 0006, 0033

PFAS

One commenter recommended EPA adopt a standard for intentionally added PFAS at zero, including any PFAS introduced in manufacturing. The commenter also recommended manufacturers seeking Safer Choice or DfE certification for their products should demonstrate through an approved method of testing that no PFAS are in the product. The commenter noted setting a stringent standard would provide EPA with tools to help reduce sources of PFAS in the environment and reduce costly impacts by helping consumers find PFAS-free products. The commenter added this will also require manufacturers to innovate and accelerate the switch to safer alternatives.

Another commenter noted EPA has not yet acted to prohibit PFAS in the product categories that Safer Choice currently covers and has not updated its Safer Choice standard since 2015.

Sources: 0014, 0044

Fragrances

Several commenters discussed health concerns with products containing fragrances, especially for vulnerable populations. One commenter noted fragranced products, such as air fresheners and cleaning products, can cause headaches, respiratory problems, eye irritation, and rashes and can emit VOCs that negatively impact the environment, people, and pets. Two of the commenters noted fragrance ingredients are considered proprietary and are not disclosed. Some commenters suggested EPA impose stricter requirements for products that contain fragrances. Specifically, some of these commenters urged EPA to require full ingredient disclosure of all fragrance components in a product to the public, while other commenters suggested EPA only certify fragrance-free products in the Safer Choice program.

One commenter noted the role which fragrance plays within many products and recommended EPA use the International Fragrance Association (IFRA) standards for any potential expansion by the Safer Choice and DfE programs into new product categories to help consumers' confidence in the safe use of fragrances.

Sources: 0021, 0022, 0037, 0099, 0101, 0102, 0111, 0117, 0118

Volatile Organic Compounds (VOCs)

Several commenters discussed health concerns with products containing VOCs and recommended EPA impose stricter requirements for chemicals that are VOCs. One commenter urged EPA to reconsider the current VOC criteria for industrial products, citing the current CARB VOC limits apply only to consumer and institutional products and are not appropriate limits for industrial settings.

Sources: 0005, 0021, 0037, 0099, 0111, 0118

6. Considerations for expanding the Safer Choice program into new sectors

Environmental Justice

One commenter stated the Safer Choice and DfE programs are critical for reducing harmful exposures from consumer products and achieving environmental justice since the certifications are rigorous, transparent, and allow state and local governments to easily recommend products. The commenter noted marginalized populations experience higher levels of exposure to environmental pollutants and that it is critical to identify ways to reduce exposures from consumer and industrial products in these populations. The commenter recommended EPA focus on products used by small businesses and industries overrepresented by marginalized communities as well as products used by babies, children, and pregnant people.

Another commenter recommended EPA 1) engage companies that market their products to people of color; 2) place Safer Choice labels on a broader range of products to reduce the burden of searching ingredients lists, especially for non-English speakers; and 3) identify product types used by occupational groups that are overrepresented by racial and ethnic minoritized groups where exposures to toxic chemicals have been found or are likely (e.g., buildings and grounds cleaning and maintenance occupations and construction and extraction occupations).

Sources: 0015, 0017

PFAS

One commenter expressed support for Safer Choice certification of product categories that contain PFAS such as stain/water resistance treatments, cosmetics, floor and furniture waxes and polishes, automotive waxes and polishes, ski wax, paints, and sealants. Many commenters referenced the use of PFAS as a rationale for certifying products in specific sectors as described in the above sections.

Source: 0017

Workers

Several commenters recommended EPA consider product categories used by workers in various product sectors due to increased exposure. One commenter recommended EPA explore opportunities to evaluate a wider variety of product types used in business settings where employees can be exposed to hazardous chemicals by either working with or near products such as paints, cleaning products, degreasers, and dry-cleaning chemicals. The commenter explained work settings are an important venue for hazardous exposures from consumer products since employees working with or near hazardous chemicals often experience more frequent and higher intensity exposures.

Sources: 0005, 0015, 0017, 0028, 0030, 0039

Cost

Two commenters noted the cost to apply for Safer Choice certification. One commenter suggested EPA provide third-party profilers with access to evaluations of chemicals that had been previously evaluated by other third-party profilers to reduce cost to businesses. The also commenter suggested if an ingredient is on the SCIL, the profilers should not have to reevaluate it repeatedly. Another commenter suggested EPA seek resources to help companies, particularly small businesses, to offset the costs of obtaining the Safer Choice label or to reformulate products. The commenter noted the state of Washington recently enacted legislation directing the Washington Department of Ecology to create an initiative to provide support to small businesses for making safer cosmetics in anticipation of possible expansion of the program. The commenter stated this is the kind of investment in 'clean business' that makes sense and should be supplemented by federal resources.

Sources: 0005, 0036

Other

Commenters associated with a mass mailing campaign noted the Safer Choice program would have a larger impact if expanded and incorporated into regulatory programs. The commenters noted the Safer Choice program could support the Clean Water Act by identifying priority chemicals for elimination and identifying alternative processes that could eliminate those substances and create a list of substances for which National Pollution Discharge Elimination System permits might be allowed for specified uses.

Another commenter recommended EPA "be wary of changing programs from being 'voluntary only.'" The commenter suggested if EPA is considering the Safer Choice program in any mandatory or regulatory sense, additional feedback would be needed through additional comment channels (i.e., via the TSCA program) and significant effort and resources would need to be dedicated to improving the viability and

soundness of the current programs (e.g., the current program is primarily hazard-based, and appropriate risk assessments should also consider exposure).

One commenter suggested EPA consider education initiatives about the Safer Choice and DfE programs for consumers, commercial buyers, and users of the new product categories and a third-party assessment that evaluates consumer and commercial buying preferences and how the Safer Choice and DfE logos might impact purchasing and use decisions.

Sources: 0022, 0034, 0045, 0119

Appendix A. Comment Index by Organization

Organization	Index
Adrian Dominican Sisters, Portfolio Advisory Board; Alaska Community Action on Toxics; Allergy Standards Limited; American Sustainable Business Network; Beautycounter; Black Women for Wellness; Breast Cancer Prevention Partners; Center for Environmental Health; Change Chemistry; ChemFORWARD; Clean Production Action; Clean Water Action/Clean Water Fund; Congregation of St. Joseph; Consumer Reports; Credo; Ecology Center; Environmental Defense Fund (EDF); Environmental Working Group (EWG); Green Science Policy Institute; League of Conservation Voters; McFadden and Associates; Mercury Policy Project; Mercy Investment Services, Inc.; Natural Resources Defense Council (NRDC); Naturepedic Organic Mattresses & Bedding; Oregon Environmental Council; Parnassus Investments; Pollution Prevention Resource Center; Providence St. Joseph Health; Proxy Impact; Responsible Purchasing Network; Ritual; Safer States; Sephora USA; Seventh Generation; Sisters of St. Francis of Philadelphia; Toxic-Free Future; WE ACT for Environmental Justice; Women's Voices for the Earth	0032
Alliance of Nurses for a Healthy Environment (ANHE)	0100
American Cleaning Institute (ACI)	0007
American Sustainable Business Network	0033
BASF Corporation	0011
Beautycounter	0038
Beta Analytic Testing Laboratory	0006
California Department of Toxic Substances Control (DTSC)	0215
Case Medical, Inc.	0109
Change Chemistry	0013
ChemFORWARD, Beautycounter, Credo, The Honest Company, Sephora, and Environmental Defense Fund (EDF)	0027
Chemical Sensitivity Disorders Association	0074
City and County of San Francisco Environmental Department	0030
Consumer Healthcare Products Association (CHPA)	0216
Environmental Defense Fund (EDF)	0021
Food Packaging Forum	0012
Fragrance Society & Advocacy Council (FSAC)	0022
Green Seal	0044
Hazardous Waste Management Program in King County (Haz Waste Program)	0017
Henkel Corporation	0016
Household & Commercial Products Association (HCPA)	0034
IBOW2U LLC	0041
Indoor Air Innovation & Research (iAIR) Institute	0024

isgenuity	0004
Local Food Production Initiative Inc.	0155
Mass Comment Campaign sponsored by Toxic-Free Future (917)	0048
Mass Comment Campaign sponsored by WE ACT for Environmental Justice (101)	0047
Mass Comment Campaign sponsoring organization unknown-1 (11)	0045
Mass Comment Campaign sponsoring organization unknown-2 (283)	0046
National Retail Federation (NRF)	0019
Novozymes North America	0026
Personal Care Products Council (PCPC)	0020
Pollution Prevention Resource Center (PPRC)	0042
Proctor & Gamble Company (P&G)	0029
Public Health - Seattle & King County (PHSKC)	0014
Responsible Purchasing Network	0115
Seventh Generation	0025
Silent Spring Institute	0035
Sustainability Group	0018
Toxic-Free Future	0036
Toxics Use Reduction Institute (TURI)	0039
Trillium Asset Management	0040
Washington State Department of Ecology (Ecology) and the Washington State Department of Health (DOG)	0015
WE ACT for Environmental Justice	0023
Women's Voices for the Earth (WVE) et al.	0028 , 0031
Public Citizens	0002 , 0003 , 0005 , 0008 , 0009 , 0010 , 0037 , 0043 , 0049 , 0050 , 0051 , 0052 , 0053 , 0054 , 0055 , 0056 , 0057 , 0058 , 0059 , 0060 , 0061 , 0062 , 0063 , 0064 , 0065 , 0066 , 0067 , 0068 , 0069 , 0070 , 0071 , 0072 , 0073 , 0075 , 0076 , 0077 , 0078 , 0079 , 0080 , 0081 , 0082 , 0083 , 0084 , 0085 , 0086 , 0087 , 0088 , 0089 , 0090 , 0091 , 0092 , 0093 , 0094 , 0095 , 0096 , 0097 , 0098 , 0099 , 0101 , 0102 , 0103 , 0104 , 0105 , 0106 , 0107 , 0108 , 0110 , 0111 , 0112 , 0114 , 0116 , 0117 , 0118 , 0119 , 0120 , 0121 , 0122 , 0123 , 0124 , 0125 , 0126 , 0127 , 0128 , 0129 , 0130 , 0131 , 0132 , 0133 , 0134 , 0135 , 0136 , 0137 , 0138 , 0139 , 0140 ,

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