

April 3, 2019

The Honorable John Lincoln  
Co-Chair, Alaska House Resources Committee  
State Capitol Room 102  
Juneau AK, 99801

The Honorable Geran Tarr  
Co-Chair, Alaska House Resources Committee  
State Capitol Room 128  
Juneau AK, 99801

Re: CTA Comments on HB 27—Flame Retardants

Dear Chair Lincoln, Chair Tarr, and the Alaska House Resources Committee,

The Consumer Technology Association (CTA) respectfully submits these comments to voice our concerns and opposition to House Bill 27, which proposes to prohibit the use of certain flame-retardant chemicals in consumer products. CTA stands behind the intent of this bill to protect the health and wellbeing of young children and residents of Alaska, but this measure could have significant unintended consequences for electronic products and products that contain electronic components.

CTA is the trade association representing the U.S. consumer technology industry. Eighty percent of CTA's more than 2,200 member companies are small businesses and startups; others are among the world's best known manufacturing and retail brands. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design, energy efficiency, and product and packaging stewardship. The electronics sector has been voluntarily phasing out toxic chemicals in electronic devices for years – when and where technology, science, and advances in new material developments support the change.

This bill would prohibit organohalogen flame retardants and antimony from a list of consumer products which includes toys, upholstered furniture, and other products used in the home for or by a child or parent. This definition would encompass a number of electronic products or products that contain electronics components. For example, toys with internal electronic parts, motorized child swings, baby monitors, and common electronic products like phones and televisions are used “by a child or the parent or guardian of a child.”

Electrical products and electronic components often contain the chemicals listed in this bill in order to meet stringent fire safety standards, such as UL 94. Printed circuit boards,

component casings, and numerous other electronic parts that either carry currents or are near parts that carry currents can pose a fire risk and thus require these chemicals as a safety precaution. The chemicals used in these products help protect consumers from potential hazards that inherently come with internal heat sources. Given the important role these chemicals play in electronics, we respectfully ask that the definition of “consumer product” contain an exemption for consumer electronics, electronic components, and their associated casings.

Other states which have restricted flame retardants in children’s products have exempted electronics from their scope. For example, California’s recently passed Assembly Bill 2998, now [Chapter 924 of California’s 2018 statutes](#), prohibits the use of flame retardants in children’s products and upholstered furniture. Sections 19100(d) and 19101(c) of this statute clearly carve out and exclude consumer electronics and electronic components from the scope of covered products. Other states like Minnesota, Vermont, and Washington have done similarly.

For these reasons, we respectfully ask that you oppose HB 27. **If full opposition is not feasible, we specifically request that consumer electronics, electronic components and their associated casings be excluded from the scope of this bill.** Thank you for the opportunity to provide these comments. If you have any questions about our concerns, please do not hesitate to contact me at [dmoyer@cta.tech](mailto:dmoyer@cta.tech).

Sincerely,

Dan Moyer  
Sr. Manager, Environmental Law & Policy  
Consumer Technology Association