August 4, 2025

Department of Toxic Substances Control (DTSC)
Safer Consumer Products Program
P.O. Box 806
Sacramento, CA 95812-0806
calsafer@dtsc.ca.gov

Re: Support for proposed addition of microplastics to the Candidate Chemicals List

The Environmental Working Group (EWG) strongly supports the Department of Toxic Substances Control's (DSTC) proposed addition of microplastics to California's Candidate Chemicals List as part of its Safer Consumer Products Program.

EWG is a nonprofit public health and environmental research and advocacy organization with offices in Sacramento, Minneapolis and Washington, D.C. EWG's research focuses on understanding health risks from chemical contamination of water, food, consumer products and the environment, supporting a healthy indoor and outdoor environment for all communities.

Adding microplastics to the Candidate Chemicals List would let the DTSC consider options for protecting public health from plastic particle exposures under the Safer Consumer Product Program. Inclusion on the list, once finalized, would represent an important step forward in protecting all Californians, especially children, from exposures to microplastics. It would also boost efforts to address the health harms of chemical additives that are frequently associated with and leach from microplastics.

EWG first expressed support for the proposed addition in a July 2023[1] letter to the DTSC, and we reiterate our position in this letter.

Adding microplastics to the Candidate Chemicals List is supported by their environmental persistence, widespread occurrence in indoor and outdoor environments from many sources, and potential for toxicity and harm to different organs and tissues in humans.

[1] EWG comments to California DTSC on proposed inclusion of microplastics to the Candidate Chemicals List. Submitted by Bill Allayaud and Tasha Stoiber, Ph.D. https://www.ewg.org/news-insights/official-correspondence/2023/07/ewg-comments-california-dtsc-proposed-inclusion

Research shows that every day people unknowingly swallow, inhale and are dermally exposed to large quantities of plastic particles in the nano- and micro- size range[2] and these particles are accumulating in our bodies[3].

While more research is urgently needed, existing data support a conclusion that exposure to plastic polymer particles can threaten human health. Studies link exposure to plastic particles with a greater risk of stroke or heart attack[4], and a variety of additives are associated with plastics and plastic fragments[5].

Five key reasons for supporting microplastics' addition to the Candidate Chemicals List are:

1) Californians, including children and vulnerable populations, have a right not to be exposed to, and harmed, by microplastic pollution.

2) There is an urgent need to review microplastic detection methods and support method development to ensure analytical testing for microplastics is adequately sensitive to reliably detect and quantify all plastic particles – from monomers and oligomers to nano and micron sized plastics in environmental and biological media.

3) With increasing evidence of human exposure to microplastics, identifying and reducing sources of exposure is an imperative action. EWG's recent analysis of microplastic exposure found sea salt[6], cutting boards[7] and other types of kitchen

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[2] Morgan SE, Romanick SS, DeLouise L, McGrath J, Elder A. Understanding Human Health Impacts Following Microplastic Exposure Necessitates Standardized Protocols. Curr Protoc. 2024;4(7):e1104. doi:10.1002/cpz1.1104

[3] Nihart AJ, Garcia MA, El Hayek E, Liu R, Olewine M, Kingston JD, et al. 2025. Bioaccumulation of microplastics in decedent human brains. Nature Medicine 31:1114-1119. doi.org/10.1038/s41591-024-03453-1

[4] Marfella R, Prattichizzo F, Sardu C, et al. Microplastics and Nanoplastics in Atheromas and Cardiovascular Events. N Engl J Med. 2024;390(10):900-910. doi:10.1056/NEJMoa2309822

[5] Symeonides C, Aromataris E, Mulders Y, et al. An Umbrella Review of Meta-Analyses Evaluating Associations between Human Health and Exposure to Major Classes of Plastic-Associated Chemicals. Ann Glob Health. 2024;90(1):52. Published 2024 Aug 19. doi:10.5334/aogh.4459

[6] Yang D., Shi H., Li L, et al. Microplastic Pollution in Table Salts from China. Environmental Science & Technology 2015 49 (22), 13622-13627, DOI: 10.1021/acs.est.5b03163 and Nilawati, Sunarsih, Sudarno. Microplastic pollution from sea salt: its effect on public health and prevention alternatives - a review. E3S Web Conf. 202 06018 (2020), DOI: 10.1051/e3sconf/202020206018.

[7] Yadav H., Hasan Khan R., Quadir M, et al., Cutting Boards: An Overlooked Source of Microplastics in Human Food? Environmental Science & Technology 2023 57 (22), 8225-8235, DOI: 10.1021/acs.est.3c00924.

equipment[8] and manufacturing and food storage in plastic are significant contributors to human exposure.

4) The listing and subsequent action is necessary to ensure that microplastics are not causing adverse effects to wildlife as well as aquatic and terrestrial ecosystems[9].

5) As detailed in EWG's 2023 letter to the DTSC, the listing of microplastics is critical due to their (i) persistence, (ii) ubiquitous occurrence and (iii) potential toxicity and exposure to plastic additives[10].

The assessment and regulatory action taken on polymers and plastics by authoritative national and international agencies has not adequately considered the environmentally persistent and potential harm from small particles and oligomers formed from plastic production and degradation. This lack of oversight has contributed extensively to the microplastic pollution of the global environment.

Inclusion of microplastics on California's Candidate Chemicals List is a critical step toward addressing this long-standing problem and protecting the health and the environment for all Californians.

Sincerely,

Bernadette Del Chiaro
Senior vice president for California
EWG

Tasha Stoiber, Ph.D.
Senior scientist
EWG

[8] Snekkevik, Vilde K. et al. Beyond the food on your plate: Investigating sources of microplastic contamination in home kitchens. Heliyon, Volume 10, Issue 15, e35022

[9] Coffin S, Weisberg SB, Rochman C, Kooi M, Koelmans AA. 2022. Risk characterization of microplastics in San Francisco Bay, California. Microplastics and Nanoplastics 2:19. doi.org/10.1186/s43591-022-00037-z

[10] EWG comments to California DTSC on proposed inclusion of microplastics to the Candidate Chemicals List. Submitted by Bill Allayaud and Tasha Stoiber, Ph.D. https://www.ewg.org/news-insights/official-correspondence/2023/07/ewg-comments-california-dtsc-proposed-inclusion