

U.S. Tire Manufacturers Association (USTMA) Statement
November 3, 2023

USTMA Pledges to Work with EPA on Appropriate TSCA Risk Management Approach for 6PPD

The U.S. Environmental Protection Agency (EPA) announced yesterday that it will initiate a risk management proceeding for 6PPD under the Toxic Substances Control Act (TSCA). The U.S. Tire Manufacturers Association (USTMA) will work closely with EPA to ensure an orderly and effective risk management process. Since learning of the effects of a newly discovered transformation product of 6PPD in late 2020, USTMA and its members have been working closely with federal and state regulators, materials suppliers, academic and government research teams, industry associations and other partners. A robust analysis organized by USTMA evaluating whether there is an available alternative to 6PPD in tires is already underway. USTMA looks forward to continuing this effort by working with EPA to identify an alternative to 6PPD and to implement it on a time-frame consistent with public safety.

6PPD is an antioxidant and antiozonant that helps prevent the degradation and cracking of rubber compounds caused by exposure to oxygen, ozone, temperature fluctuation, and flexing induced fatigue. Protection materials, such as 6PPD, are essential for tire performance and safety and any potential alternative must continue to ensure compliance with Federal Motor Vehicle Safety Standards (FMVSS) and other consumer, vehicle and tire manufacturer requirements. It is not a simple process to change the composition of tires; any change could affect the stopping distance of tires, durability, vehicle fuel economy, tire wear and other safety-related components.

As a science driven industry, committed to safety and environmental stewardship, U.S. tire manufacturers take the environmental impact of 6PPD-Quinone seriously. In December 2020, USTMA requested that the California Department of Toxic Substances Control (DTSC) include 6PPD in tires on the 2021-2023 Priority Products Work Plan. With full support from USTMA, DTSC listed motor vehicle tires containing 6PPD as Priority Products in California effective October 1, 2023. Well before this date, USTMA members began a comprehensive Alternatives Analysis to seek an effective alternative.

USTMA pledges to coordinate closely with EPA to provide appropriate information about the performance, safety, and environmental characteristics of 6PPD, 6PPD-Quinone, and potential alternatives to 6PPD. We appreciate EPA's recognition in the letter granting the petition that "that TSCA Section 6(c)(2)(C) requires EPA to 'consider, to the extent practicable, whether technically and economically feasible alternatives that benefit health or the environment, compared to the use so proposed to be prohibited or restricted, will be reasonably available as a substitute when the proposed prohibition or other restriction takes effect.'"

During this time, our ongoing robust Alternatives Analysis will continue. At present, 6PPD presents a critical and essential use in tires. While many potential alternatives are being considered, none has been demonstrated to be technically feasible for meeting federal safety requirements. Any premature prohibition on the use of 6PPD in tires would be detrimental to public safety and the national economy.