Connecticut Public Health Association
Promoting Public Health in Connecticut Since 1916

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General Assembly's Children's Committee
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TESTIMONY IN FAVOR OF H.B. No. 6332
AN ACT CONCERNING TOXIC FIRE RETARDANTS IN CHILDREN'S PRODUCTS

The Connecticut Public Health Association supports **House Bill 6332 AN ACT CONCERNING TOXIC FIRE RETARDANTS IN CHILDREN'S PRODUCTS** as a public health initiative for our state. The bill in its current form would ban the sale, manufacturing or distribution of any children's products containing Tris fire retardants within Connecticut, therefore protecting children from the health risks associated with exposure to these toxins.

The Tris flame-retardants referred to within the text of this bill (TDCPP, TDCP, TCEP and TCPP) are a family of flame-retardants often used by manufacturers in many baby products and household furniture. In 1977, one if these chemicals, chlorinated Tris (TDCPP), was voluntarily removed from children's clothing after the U.S. Consumer Products Safety Commission found it to be a probable carcinogen in laboratory studies. In its 2006 report, the Consumer Product and Safety Commission found that chlorinated Tris posed a threat to human health, designating the chemical as a probable carcinogen [1] and since then the flame retardant has been named a carcinogen by the State of California. [2].

Chlorinated Tris has been shown to be a neurotoxin to brain cells in animal studies—animals exposed to Tris were noted to have decreased memory, learning deficits, altered motor behavior and hyperactivity [3]. And yet amazingly, the chemical is still widely used in many baby products such as changing table pads, sleep positioners, portable mattresses, baby carriers, rocking chairs, high chairs and home furnishings. Due to its chemical makeup, chlorinated Tris escapes or off-gasses from the foam padding in these products and settles in household dust, thus exposing children and adults through inhalation or ingestion [4]. An obvious conclusion is that children would be especially prone to exposure when sleeping, crawling or placing hands in their mouths. Why are we exposing our youngest and most vulnerable population to such a risk?

Animal studies have shown that exposure to multiple Tris chemicals have a variety of health effects such as increased incidence of liver, renal, testicular, and adrenal tumors. [4] Animal research also suggests that multiple Tris chemicals can negatively affect hormone levels and semen quality including sperm count, motility and morphology in males [5].

TCEP, one of the chemicals named in this bill, was identified as a substance of very high concern by the European Chemicals Agency in 2009 [6]. The Government of Canada, through its Chemical Management Plan, determined children under the age of three to be at the most risk from exposure to TCEP and in response have proposed regulations to prohibit the use of TCEP in products intended for children under the age of three. [7]

The Connecticut Public Health Association strongly supports Connecticut joining New York, which has already imposed a ban to protect children, and other nations that have banned chlorinated Tris and other Tris chemicals.

In closing, CPHA supports **HB 6332** because not doing so poses a health risk to Connecticut's youngest population. The American Public Health Association defines public health as the practice of preventing disease and promoting good health within groups of people, from small communities to entire countries. Good public health policies save money because a healthier public spends less on health care. And more importantly, healthier children mean a healthier future for our state. [8]

References:

1. Babich, MA (2006). CPSC Staff Preliminary Risk Assessment of Flame Retardant Chemicals in Upholstered Furniture Foam. U.S. Consumer Product Safety Commission.
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3. Dishaw LV, Powers CM, Ryde IT, Roberts SC, Seidler FJ, Slotkin TA, Stapleton HM. (2011). Is the PentaBDE Replacement, tris (1,3-dichloro-2-propyl) phosphate (TDCPP), a developmental neurotoxicant? Studies in PC12 cells. Toxicology and Applied Pharmacology.
4. Faust, JB and August, LM, California Environmental Protection Agency (2011). Evidence on the Carcinogenity of Tris (1,3-Dichloro-2-Propyl) Phosphate. Retrieved January 11, 2012 from http://oehha.ca.gov/prop65/hazard_ident/pdf_zip/TDCPP070811.pdf.
5. Inchem (1998). United Nations Environmental Programme International Labour Organisation. World Health Organization: International Programme on Chemical Safety, Environmental Health Criteria 209 Flame Retardants: Tris (chloropropyl) phosphate and Tris-(2-chloroethyl) phosphate. Geneva.

6. European Chemicals Agency. 2009. Support Document for Identification of Tris (2-chloroethyl) phosphate as a Substance of Very High Concern because of its CMR Properties.
7. Health Canada Fact Sheet: TCEP in Products for Young Children – http://www.hc-sc.gc.ca/ahc-asc/media/nr-cp/_2012/2012-168fs-eng.php
8. American Public Health Association website http://www.apha.org