

**Testimony In Opposition to HB 6332
An Act Concerning Toxic Fire Retardants
In Children's Products**

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February 21, 2010

Senator Bartolomeo, Representative Urban, Senator Linares, Representative Betts and members of the Children's Committee:

My name is Thomas Osimitz. I have a doctorate degree in toxicology and am certified in toxicology by the American Board of Toxicology and am European Registered Toxicologist. I have spent over 30 years in the safety assessment of a wide range of chemicals. I am here today to speak against HB 6332, An Act Concerning Toxic Fire Retardants in Children's Products.

I am here to comment of the toxicology of the organophosphate flame retardants, with particular attention to TCPP. To start with, the naming of these molecules, while it conforms to a convention that chemists understand (TCCP, TCEP, TDCPP, TDBPP) can be confusing. It is tempting to group them all together, referring to them as simply "flame retardants" or "OPFRs" and treat them as identical with respect to their health and environmental properties. That is too simple of a solution and may lead to the unnecessary restriction of a chemical that lacks the undesirable properties that have led to the elimination of other chemicals.

Of most interest to me is TCPP, (2-Propanol, 1-Chloro-, Phosphate (3:1)), an important industrial fire retardant. It's been in commerce for many years and has a much science that supports its efficacy and safety. TCPP is used primarily in polyurethane foam insulation. Its use there enables builders to meet building codes that are in place to the risk of fire. TCPP is *not* used in children's products, nor will it be. Unfortunately, it has been inaccurately lumped with similar sounding chemicals into the current chemical legislative debate due to comparisons to other flame retardant, some of which are no longer made or sold in the US.

TCPP has been through all required health and safety testing procedures and is approved for use worldwide. I have reviewed much of the data that supports the safety of TCPP. Most significant is the 400 plus page European Union Risk Assessment Report, a document that I consider to be the most comprehensive and carefully done assessment of TCPP.

In contrast other molecules to which it is related and with which it is often discussed, it is not considered neurotoxic (toxic to the nervous system) nor is it toxic to the reproductive system. Speaking in regulatory terms, it is not "classified" as a CMR (carcinogen, mutagen, or reproductive toxicant) or a PBT (persistent, bioaccumulative, toxic chemical). This is important, because it those properties:

CMR, PBT that have led to the elimination from commerce of several of the other flame retardants.

The EU carried out a full multi-year risk assessment for TCPP and for consumer exposure and concluded that at present there is no need for further information and/or testing and no need for risk reduction measures beyond those which are being applied. A finding that was reaffirmed in a 2011 independent study done for the EU Consumer and Health Authorities (DG-SANCO).

Conclusion...

Therefore, please be sure to make the distinction between molecules that have a demonstrated undesirable profile and TCPP, a molecule with flame retardant efficacy, a use pattern that does not include children's products, and a favorable safety profile.

I thank you for the opportunity to speak to you today and am willing to answer any questions that you may have.