Co-chair Abrams, Co-chair Steinberg and members of the Committee on Public Health. My name is Judah Prero, and I am here today representing the American Chemistry Council and its North American Flame Retardant Alliance (NAFRA).

We appreciate the opportunity to testify today and look forward to additional opportunities to provide information to the Legislature on the issues of flame retardants, fire safety, and chemical safety.

Our member companies represent the cutting edge of fire-safety chemistry and technology, and are dedicated to improving fire safety performance in a wide range of products. Our industry is also committed to strong chemical safety regulation, to protect users and those who may be exposed to our products, while also protecting that same population from the dangers of fire by promoting fire safety.

I am respectfully speaking today in opposition to HB 6516. I would like to highlight three primary objections:

First - Fire safety is a real issue and flame retardants are an important tool to help reduce fires, fire deaths and property damage. HB 6516, in its current form, could undermine overall product safety and increase fire risk for Connecticut’s citizens, communities and emergency responders.

Second - This legislation prohibits the use of a huge class of substances without any consideration of the actual safety or risk posed by any specific product. This is not supported by the state of the science. Flame retardants include a broad range of products with differing characteristics, formulations and intended uses, so it is not appropriate to make broad conclusions or impose a one-size-fits-all regulatory approach for this wide range of substances.

And third - Flame retardants are reviewed for their safety by regulators around the world. This legislation would not only ban substances that government regulators have already determined do not present a risk, but also new, innovative substances to be developed in the future that may be approved by regulators for use. A blanket ban that fails to acknowledge science-based regulatory processes and future developments is not good public policy.

To my first point:

- Fires have dropped significantly over the past 40 years. A major contributor to the decline in fires and fire deaths since the 1970s was the development of a comprehensive set of fire-safety measures that include flame retardants.

- At the same time, fire still represents a very real danger in the United States and this is equally true for Connecticut. In 2016, there were almost 4,000 fire incidents, 88 civilian-related injuries and 8 civilian fire-related deaths in Connecticut. The total property loss due to fire damage and destruction was more than $32.5 million.
One area of particular relevance to this Committee is the fire safety risk to children. According to the U.S. Fire Administration’s 2016 data on fire risk to children, 309 children younger than 15 died as a result of fires and almost 50 percent of all child fire deaths affected children age 4 or younger. Also, fire injuries affected an estimated 1,465 children in 2016 and 50 percent of child fire injuries occurred to children age 4 or younger.\(^5\)

The reality is that the changing nature of our homes and consumer products has increased the fire risk of many products. Our homes and offices have more synthetic materials than they did 30 years ago. On their own, many of these synthetic materials can be quite fast burning. This has changed the nature of fire risk by increasing the potential flammability of products. It is worth noting that in recent years there have been upwards of 7,000 product recalls of consumer products due to fire hazards.

Because of the danger of fire, NAFRA supports robust fire protection measures and multiple layers of protections to address the risk of fire, including flame retardants. Flame retardants have been proven effective in preventing fires or if a fire does occur, slowing the fire’s progression, giving individuals and families extra time to escape from potentially dangerous fire situations.

Secondly, all “flame retardant chemicals” are not the same.

- A variety of different chemicals, with different properties and structures, act as flame retardants. A variety of flame retardants is necessary because the materials that need to be made fire-resistant are very different in their physical nature and chemical composition, as are the end-use performance requirements of the final product.

- The hazard and risk profile of various flame retardant compounds is very different. It is scientifically incorrect to apply the same profile for all and this has been repeatedly recognized by government regulators.

Lastly, regulatory agencies with scientific expertise have reviewed and made pronouncements on the safety of some of the substances – and will continue to do so for new, improved, and innovative substances that have yet to be developed.

- This legislation would restrict a broad range of substances, including substances that government authorities have determined do not present a significant risk to human health or the environment.

- This legislation would also restrict all new flame retardant chemicals, including those not even developed yet. Our industry has invested millions of dollars to develop new technologies that improve fire protection and have an enhanced environmental, health and safety profile. Yet, these new products would also be banned. The approval process for new chemicals globally, including in the US, is extremely rigorous. It is unclear why Connecticut would want to prevent the development and use of new, innovative and sustainable products.

- HB 6516 in its current form would remove the possibility for furniture manufacturers and product designers to use products in the R&D pipeline that have not yet come to market and could be essential to helping meet current and future fire safety and product safety standards. Does Connecticut really want to remove forever and always the possibility of using new technologies that could help save lives and property from fire?
**Conclusion** – In conclusion, ACC and the North American Flame Retardant Alliance support a strong, transparent, and science-based regulatory system that provides both strong fire protection and chemical safety. We look forward to additional opportunities to provide information to the Legislature on the issues of fire safety, chemical safety and flame retardants.

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1 NAFRA members include Albemarle Corporation, LANXESS Corporation, and ICL Industrial Products who manufacture flame retardants used in a wide variety of industrial and consumer applications.
2 Connecticut Department of Public Safety, U.S. Fire Administration