

Dear CHAP,

I would like to thank the Chronic Hazard Advisory Panel for the opportunity to comment on this important review process of phthalates and the available alternatives. The Child Safety Task Force applauds the panel's scientific integrity and commitment to reviewing these chemicals; however, we want to continue to encourage a balanced and thorough risk assessment of all plasticizing chemicals.

It is important that all chemicals present in consumer products are held to the same standard of safety, and we must ensure that the proposed "safer alternatives" are truly safer and adequately studied.

There are serious unintended consequences to replacing proven safe substances with less studied alternatives. The Consumer Product Safety Improvement Act (CPSIA) currently restricts the use of safe phthalates including a temporary ban on di-isonyl phthalate (DINP), a specific phthalate known to be used in children's toys. While there are approximately a dozen known alternatives to DINP, none of them have been studied by the Consumer Product Safety Commission or the National Toxicology Program. Banning safe and tested chemicals forces manufacturers to adopt less studied and potentially harmful alternatives.

The need for plasticizers in toys is still in high demand. Plastic toys that do not contain effective softeners are easily breakable and pose choking hazards. In 2004, CPSC staff warned "if DINP is to be replaced in children's products ... the potential risks of the substitutes must be considered. Weaker or more brittle plastics might break and result in a choking hazard." If we continue to keep proven safe chemicals off the market, American children will be exposed to these hazards and other unknown risks.

The Child Safety Task Force promotes more extensive review of the alternatives to ensure the safety of our children's products. Confidence in a safe product can only come from science and thorough risk assessment. In order to prevent unintended consequences and future risks, we encourage the CHAP to focus their efforts on those chemicals which have not been adequately studied.

Sincerely,

Robert Johnson, President of Child Safety Task Force