

# EASTMAN

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Eastman Chemical Company

P.O. Box 431

Kingsport, TN 37662

Office of the Secretary

FOI

March 1, 2010

Office of the Secretary  
U.S. Consumer Product Safety Commission,  
4330 East West Highway,  
Bethesda, Maryland 20814

**Re: Section 108 of the Consumer Product Safety Improvement Act: Phthalates in Children's Products; Request for Comments and Information**

Dear Sir,

Eastman Chemical Company (Eastman) submits the following information to the U.S. Consumer Product Safety Commission for consideration by the Chronic Hazard Advisory Panel (CHAP) charged with assessing potential health risks from phthalate alternatives, as directed by Section 108 of the Consumer Product Safety Improvement Act of 2008.

Eastman Chemical Company manufactures Eastman™ 168 plasticizer and Eastman TXIB™ Formulation Additive which are both used in the manufacture of flexible vinyl toys. The American Chemistry Council, Non-Phthalate Esters Panel, of which Eastman is a founding member, notified the Consumer Product Safety Commission of the use of these non-phthalate plasticizers in these markets in its letter dated January 12th 2009.

Eastman™ 168 is a primary plasticizer used to soften vinyl and is a leading phthalate alternative. Eastman TXIB™ Formulation Additive is a secondary plasticizer that is used to reduce the viscosity of PVC plastisols in the manufacture of toys. It is used in conjunction with primary plasticizers at levels approximately ten times lower than that of the primary plasticizer.

Eastman encloses toxicology summaries for Eastman™ 168 plasticizer and Eastman TXIB™ Formulation Additive to assist the CHAP in performing risk assessments on these two materials. Robust summaries in IUCLID format may also be made available to assist the CHAP provided that their confidentiality could be properly safeguarded.

Office of the Secretary,  
U.S. Consumer Product Safety Commission

Eastman would also like to draw the CHAP's attention to the existence of various independent risk assessments that have already been performed on the use of Eastman™ 168 plasticizer and Eastman TXIB™ Formulation Additive in toys. In particular, we would direct the CHAP to risk assessments conducted by the U.S. Toy Industry Association on Eastman™ 168 plasticizer, and the Dutch Food and Consumer Product Safety Authority (Voedsel en Waren Autoriteit or VWA) risk assessment of non-phthalate plasticizers used in toys and childcare articles in the Netherlands, which evaluated both Eastman™ 168 and Eastman TXIB™ Formulation Additive.

Please feel free to contact us if you require any additional information or clarification.

Yours faithfully,



Dr. SR Cullen  
Business Manager, Plasticizers Business Unit  
Eastman Chemical Company