

Phenol-4,4'-isopropylidenebis(2,6-dibromo — Comments of Environmental Defense

(Submitted via Internet 6/24/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Phenol-4,4'-isopropylidenebis(2,6-dibromo (CAS#79-94-7).

As pointed out in the Test Plan phenol-4,4'-isopropylidenebis(2,6-dibromo (CAS#79-94-7) also known as tetrabromobisphenol A (TBBPA), is a data-rich chemical. The Test Plan submitted for by the American Chemistry Council's Brominated Flame Retardant Industry Panel (BFRIP) is both thorough and well written to accurately and concisely summarize data on TBBPA toxicity's and persistence in the environment. TBBPA has been the subject of more study than most other flame retardants and other industrial chemicals because it is widely used in consumer products and because its unbrominated form, bisphenol A, has been shown to have estrogenic properties.

The literature review included in the Test Plan is very thorough and a number of the studies have been published in the open literature. Most significant among published documents is Environmental Health Criteria Document #172 that provides an excellent summary of work on TBBPA. Studies of TBBPA indicate that, unlike many flame retardants, it is readily degraded in the environment. Thus persistence and bioaccumulation should not present the problems that have resulted from use of some other halogenated chemicals. Studies conducted to date also indicate that TBBPA also has very low toxicity to fish, invertebrates, algae and mammals. On release into the environment, TBBPA partitions almost exclusively in soil and sediment where it is degraded. It is also readily metabolized and excreted by mammals.

Our review of the Test Plan submitted for TBBPA indicates that all required SIDS elements are addressed and the studies described are adequate. Therefore, we concur in the sponsor's conclusion that no additional data are needed.

Thank you for this opportunity to comment.

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