

May 27, 2009

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Via email: existing.substances.existantes@ec.gc.ca, riskmanagementprograms@ec.gc.ca

Re: State of the Science and Revised Risk Management for PDBEs (*Response to Canada Gazette, Part I, Vol. 143, No. 13 – March 28, 2009*)

The **Canadian Partnership for Children's Health and Environment (CPCHE)** is an innovative and multi-sectoral collaboration of medical, environmental, public health and child care organizations, formed in 2001. Our main focus is to reduce and prevent fetal and childhood exposures to toxic substances by promoting advancements in research, policy and practice.

Our research indicates that consumer products are a significant source of the toxic substances of concern for children, *in utero* and throughout childhood.

Using the results of a year-long, cross-Canada National Policy Consultation that we convened in 2007 involving representatives of government, industry, public interest groups and other stakeholders, CPCHE partners developed *First Steps in Lifelong Health – A Vision and Strategy for Children's Health and Environment in Canada*, released in December 2008. Among this report's recommendations is a major focus on consumer product safety. The report and associated media release are available on the CPCHE website at:
http://www.healthyenvironmentforkids.ca/english/special_collections/fulltext.shtml?x=4025.

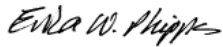
By way of response to the consultation documents concerning DecaBDE, we wish to make specific reference to the position taken by CPCHE in *First Steps in Lifelong Health*. We specifically recommended that immediate action is needed to fully ban all PBDEs, including DecaBDE (pages 5 and 26). CPCHE partners continue to hold this position.

We are very encouraged by the proposal to revise the Risk Management Strategy for DecaBDE and bring Canada in line with the European Union Restriction on Hazardous Substances (RoHS) Directive.

This move to essentially ban PBDEs in electronics is most welcome. However, we believe that the **remaining uses of DecaBDE, largely in plastics and textiles, are equally in need of phase-down and phase-out.** As the revised Risk Management Strategy notes, much of the releases of DecaBDEs associated with textiles occur during the “product service life.” Hence, these releases are occurring indoors and likely making significant contributions to the levels of PBDEs in dust that recent studies are linking directly to the unacceptably high levels of PBDEs in human serum and breast milk.

Thank you for the opportunity to provide input on this important issue.

Yours sincerely,



Erica W. Phipps
Partnership Director
on behalf of the CPCHE Partners

CPCHE PARTNERS

