



European Flame Retardants Association

International Sleep Products Association
501, Wythe Street
Alexandria VA 22314-1917
USA

Brussels, 1 June 2001

RE : **THE APRIL EDITION OF BEDTIMES MAGAZINE**

Dear Sirs,

EFRA, the European Flame Retardants Association, is a trade association like yourselves and it is one of our tasks to represent the flame retardant industry as a whole to the outside world. Some of our member's customers are manufacturers of furniture and mattresses. One of these companies drew our attention to the article on page 36 of your April 2001 magazine. The article was entitled "**Burning Issues and planetary comfort**".

There was a quote in the article referring to flame retardants : "Besides damaging the environment, tests certify that these chemicals also affect human health".

The chemical industry in general is regularly faced with sweeping statements such as these, which categorise a family of products (different products with the same functionality) under one umbrella. EFRA supports dissemination of information into the public domain as long as this is correct and balanced information. Each flame retardant has its own profile and must be treated on an individual basis.

There is a lot of attention at the moment in Europe on chemicals which are found in the environment or in buildings. In most cases the levels detected are many thousands of times below accepted safe levels but nevertheless are detectable using recently developed analytical techniques. The chemical industry works with a voluntary initiative called "responsible care" and if there is evidence that a product is dangerous for the environment or dangerous to human health, then under this programme it is withdrawn. There are many on going and planned risk assessments being carried out in Europe at this time on a variety of chemicals including some flame retardants. Certain flame retardants which proved to be accumulating at detectable levels in biological systems have been phased out, even though there is no evidence that this represented a health or environmental hazard. The National Academy of Science (NAS) in the USA recently published toxicological risk report which concluded with a list of flame retardants which could safely be used in furniture, this was mainly targeted at textiles but in many cases these products are also relevant for upholstery foam. Other flame retardants considered in this report did not receive the all clear because only data in the public domain was considered. Unpublished company data was not accepted. If this had been the case more flame retardants would have been on their list of safe products.

A SECTOR GROUP OF



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We are anxious to balance the argument with respect to flame retardants and would draw your attention to the number of lives saved by the use of these products in, for example furniture. The statistics from the state of California and for the UK clearly show the lives saved by the introduction of regulations to control the fire safety of upholstered furniture [References (1) and (2)]. We also see it as our mission to try to correct incomplete or inaccurate information such as that which appeared in your magazine. Mattress manufacturers, furniture manufacturers, and other industries, have used flame retardants to reduce the fire risk of their products for many years now, and it is important that they should continue to make decisions in this important area for public safety.

Finally, this is not meant as a criticism of your magazine but merely an attempt to put the record straight and point out that flame retardant mattresses can – and should, for reasons of product safety! - be produced without endangering human health or the environment.

Yours faithfully,



Dr. Brigitte DERO
Secretary General EFRA

References :

- (1) Effectiveness of the furniture and furnishings Fire safety regulations 1988.
Published by the Department of trade and industry UK. June 2000

- (2) "California Upholstered furniture Fire Losses vs. the rest of the U.S. Bea Harwood
Paper obtainable from the NASFM website at :

http://www.firemarshals.org/issues/home/home_pdf/furn_pdf/cal_vs_us_furn.pdf