

Appended Comments (**after December 13 deadline**)  
to Legislative Report: *Options to Reduce and Phase-  
out Priority Chemicals in Children's Products and Promote  
Green Chemistry*

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# Property Rights Association of Minnesota

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February 17, 2011

Ms. Jennifer Holstad  
Minnesota Pollution Control Agency  
525 Lafayette Road  
St. Paul, MN 55101

Jennifer,

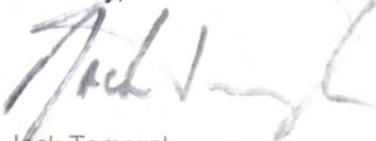
Thank you for allowing public comments on the "Options to Reduce and Phase-Out Priority Chemicals in Children's Products and Promote Green Chemistry" report to the legislature.

One of the chemicals the PCA has called out is DIDP. DIDP is a type of phthalate, a plasticizer, used to make plastic soft and flexible, which is on the list of chemicals of high concern. The reality is that, DIDP has been subjected to a number of independent assessments, including one from the National Toxicology Program (NTP) which expressed minimal to negligible concern for toxicity of DIDP. Additionally, the European Union and the Organization for Economic Co-operation and Development (OECD) have risk assessed these chemicals. The European Commission confirmed that DIDP poses no risk to either human health or the environment from any current use.

DIDP is used primarily for wire and cable insulation and jacketing and automotive protective undercoating. DIDP is used for multiple reasons including its low volatility, its durability, extraction resistance, and insulation properties – all of which are crucial for safe construction and building. Replacing such a valuable chemical could negatively impact our economy and consumers. There are simply not enough alternatives that exist to replace phthalates; so these products would not be able to be produced at current levels.

It would be more helpful if our regulators weighed both the risk and the benefit of each chemical under review, while also considering the safety of the alternative products. Our property owners are concerned for the well being of their businesses and safety of their clients should DIDP be replaced with a less dependable and less tested substance.

Sincerely,



Jack Tomczak  
Executive Director  
Property Rights Association of Minnesota