



100 North 20th Street, 4th Floor; Philadelphia, PA 19103-1443 (215) 564-3484
FAX: (215) 564-2175 Email: tsa@fernley.com www.tinstabilizers.com

The Tin Stabilizers Association's response to "Sick of Dust"

Certainly, questions about the health hazards of household dust are not new. Lots of research has been done on this subject and more is underway. While this new report adds to that body of knowledge by helping quantify some of the many, many substances found in the dust in our homes, it does not add anything new or substantive regarding organotins. Furthermore, although the report's data gathering and analysis techniques appear solid, the conclusions it reaches about potential health risks are not – specifically the possible health risks associated with the presence of tin stabilizers in dust. Here's why:

First, the report ignores the fact that the quantities of organotins found are miniscule, which means that real exposure is negligible. As is often the case with reports of this type, the authors have failed to make the required connection between *exposure* and *risk*. In fact, the organotin industry has supported a number of risk assessment efforts examining the issue of dust exposure, and from all of the work done so far there is no indication that the levels of organotins cited in "Sick of Dust," or other reports on dust, pose a health threat. Indeed, within the past year, the European Commission's Scientific Committee on Toxicity, Ecotoxicity and the Environment (CSTEE) completed a wide-ranging and extensive review of tin stabilizers as part of the EU's risk assessment of organotin products. CSTEE identified no areas of concern for most uses of tin stabilizers, with the exception of tin stabilizers in food contact applications, which the committee decided to examine more closely. Our counterpart in Europe, ETINSA, is working with CSTEE on this question and we are confident these applications will be cleared of any concern as well once the committee reviews the most recent market data for food contact applications involving tin stabilizers.

Second, the report is very misleading in lumping all organotin products together – both those used as tin stabilizers and those used as biocides and catalysts. The chemistry of these classes of products is very different, as are their uses, and one type of product is never substituted for another. To broadly assign health effects and risk potential across this range of chemistries and request broad regulatory action is totally inappropriate.

Third, the report implies that tin stabilizers need more careful regulation. In fact, tin stabilizers have been reviewed and approved for use by numerous third-parties throughout the world, including NSF International, the UBA (Germany's equivalent of the U.S. Environmental Protection Agency) and BgVV (Germany's federal institute for health protection of consumer and veterinary medicine). Study after study, by both industry and third parties, reveals no credible evidence that tin stabilizers pose a health

risk for consumers who use products manufactured with these additives. Tin stabilizers have been used safely for more than 50 years. Most importantly, regulatory agencies like the U.S. Food and Drug Administration (FDA) and others throughout the world have issued clearances for the use of certain tin stabilizers in critical applications like food packaging and pipes that carry drinking water.

Finally, the report recommends phasing out tin stabilizers, products that are well-tested and have been used safely for decades, and replacing them with less tested substitutes touted to be “safer.” Such a strategy fails to examine the implications of such a move. Tin stabilizers are preferred because they provide performance properties other products cannot, and do so with significant research behind them.

Issued April 2005