



CAL DOOLEY
PRESIDENT AND CEO

June 17, 2014

Mr. Bernard J. Tyson
Chairman and CEO
Kaiser Permanente
One Kaiser Plaza, 1550 Ordway
Oakland, California 94612

Re: Kaiser Permanente's new furniture standard

Dear Mr. Tyson:

The North American Flame Retardant Alliance (NAFRA) of the American Chemistry Council is troubled by Kaiser Permanente's recent announcement that it will stop buying furniture that contains flame retardants. NAFRA represents major manufacturers of a wide variety of flame-retarding substances¹ who are committed to offering products that enhance fire safety without negatively impacting human health. We believe that Kaiser's recent decision warrants further review given that the flame retardants mentioned in the announcement are no longer in commerce, and in light of recent statements from the United States Environmental Protection Agency (EPA) regarding the safety of a number of flame retarding chemicals. We respectfully ask that you carefully consider the following facts on flame retardants, and request an opportunity to meet with you to discuss the issue further.

Flame Retardants Help Save Lives

Flame retardants are an important tool in the fire safety tool box. They represent an important layer of fire protection in hospitals, health care facilities, and medical offices. Their use has helped the health care industry achieve a low incidence of fire-related deaths and injuries, despite the fact that an estimated 6,240 fires (about 17 fires per day)² occur in health care facilities annually. The use of flame retardants in upholstered furniture can help prevent fires from starting and/or slow the rate at which small fires become big fires, providing valuable time for persons to escape danger. By prohibiting flame retardants in furniture at its facilities, Kaiser will increase its reliance on technologies designed to reduce the effects of a fire after it has started (e.g., sprinklers), rather than preventing fires from starting in the first place.

¹ NAFRA members include Albemarle Corporation, Chemtura/Great Lakes Solutions, and ICL Industrial Products. These companies manufacture flame retardants based on bromine, phosphorous nitrogen, and inorganic chemicals.

² Ahrens M. Fires in Health Care Facilities. National Fire Protection Association. Quincy, MA. (November 2012, Revised April 2013).



Flame Retardants are Subject to Regulatory Review

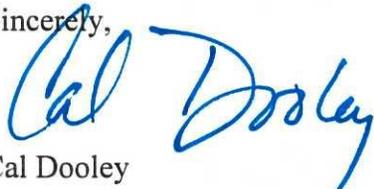
In its announcement, Kaiser Permanente lists potential health effects that have been associated with exposure to a group of flame retardants, called polybrominated diphenyl ethers or PBDEs, that were voluntarily phased out by the leading manufacturers as long as a decade ago.³ It is important to note that many of the concerns about these chemistries are not based on solid science. In fact, several studies of the potential effects of PBDE exposure have been conducted, and a recent review of these data concluded that the evidence that PDBEs cause adverse health effects remains “weak and inconclusive.”⁴

As is the case for all chemicals introduced into commerce since the mid-1980s, flame retardants developed to replace PBDEs have been subject to review by EPA. In a recent assessment, EPA identified approximately 50 flame retardants that the agency said were “unlikely to pose a risk to human health.” Included in this category are flame retardants that are designed to virtually eliminate the potential for exposure.

This Issue Deserves Further Discussion

Given the variety of flame retardant products available to furniture manufacturers and the important contribution these products can make to fire safety, we urge you to give further consideration to the recently announced policy for purchasing upholstered furniture. We would like to meet with you and your staff to further discuss the information outlined in this letter. In the meantime, please feel free to contact me or Steve Risotto (Steve.Risotto@americanchemistry.com) if you require additional information about the safety and efficacy of today’s flame retardant products.

Sincerely,



Cal Dooley

³ <http://www.epa.gov/oppt/existingchemicals/pubs/ganda.html>.

⁴ Kim YR et al. Health consequences of exposure to brominated flame retardants: A systematic review. *Chemosphere* 106:1-19 (2014). Kim et al reviewed 36 studies that investigated the potential health effects of exposure to PBDEs and other brominated substances.