

From: [Bob Raymer](#)
To: [P65Public Comments](#)
Subject: Re: HID – DINP
Date: Monday, November 18, 2013 11:53:17 AM

Ms. Cynthia Oshita
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010

Re: HID – DINP

The California Building Industry Association (“CBIA”) represents approximately 3,000 member companies that collectively are responsible for a substantial percentage of the production of all new homes each year in California. Our members are homebuilders, subcontractors, architects, engineers, sales agents, lawyers, insurers, product manufacturers, planners, land developers, lenders and title companies. Collectively, our industry adds tens of billions of dollars to the state’s economy while employing over one hundred thousand Californians. The following comments are being submitted in opposition to the proposed listing of Diisononyl Phthalate (DINP) to the Proposition 65 list.

The very products that the proposed listing identifies as possibly containing DINP actually make buildings safe and long-lasting.

The listing of DINP could have a significant adverse effect on our industry both in the quality of construction and the jobs we create. A listing will also threaten safety of the buildings since products that may contain DINP also serve a fire-safety function. The removal of DINP from electrical wiring and cable will lead manufacturers to use less tested and safe alternatives – alternatives about which we do not yet know the safety, sustainability or performance.

California’s Office of Environmental Health Hazard Assessment should take a careful and considerate look at the body of science supporting the safety of DINP. Numerous agencies, including the U.S.’s Consumer Product Safety Commission, have all found DINP safe for its intended uses. Recently, the European Union and Australia’s NICNAS agreed with these findings.

The Carcinogen Identification Committee (CIC) should examine the complete range and breadth of science available to them and make a decision that is based on science rather than political theater. Any listing by the CIC should have deep roots based on sound science rather than public opinion as any listing will have far-reaching implications for Californians.

CBIA strongly believes that the listing of DINP is unfounded in both science and policy. We urge the CIC to not list DINP on the Proposition 65 list as the science has shown that carcinogenic effects are unfound in humans.

Sincerely,
Bob Raymer

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Senior Engineer/Technical Director

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