



# WOMEN'S VOICES FOR THE EARTH

OUR HEALTH. OUR FUTURE. TOXIC FREE.

Department of Toxic Substances Control  
Safer Consumer Products  
P.O. Box 806  
Sacramento, CA 95812

November 29, 2016

Re: Priority Products Workplan Implementation : Potential Aquatic Impacts and Continued Uses of Nonylphenol Ethoxylates and Triclosan.

To whom it may concern:

I am writing on behalf of Women's Voices for the Earth, a non-profit women's environmental health organization. Our mission is to eliminate the toxic chemicals that harm our health and communities, and we are particularly concerned about the toxic chemicals found in fragrances.

Regarding the DTSC's request for information on Potential Aquatic Impacts and Continued Uses of Nonylphenol Ethoxylates, we would like to bring to your attention our concerns about the use of nonylphenol and nonylphenol ethoxylates in fragrance. The use of these chemicals in fragrance is infrequently discussed, we noticed, for example, that it is not mentioned in DTSC's documents on NPEs. However, despite the traditionally secretive nature of the fragrance industry, there is clear evidence that nonylphenol ethoxylates are used in fragrance. Specifically, the International Fragrance Association publishes a Transparency List of nearly 3,000 fragrance ingredients used in consumer goods by their customers worldwide. The Transparency list is found here: [www.ifraorg.org/en-us/ingredients](http://www.ifraorg.org/en-us/ingredients)

We identified the following Nonylphenol ethoxylates on the IFRA Transparency List.

9016-45-9	Nonylphenolethoxylate
37205-87-1	Poly(oxy-1,2-ethanediyl), a-(isononylphenyl)-w-hydroxy-
68412-54-4	Poly(oxy-1,2-ethanediyl), .alpha.-(nonylphenyl)-.omega.-hydroxy-, branched
127087-87-0	Poly(oxy-1,2-ethanediyl), .alpha.-(4-nonylphenyl)-.omega.-hydroxy-, branched

Two forms of nonylphenol are also found on the IFRA Transparency list.

25154-52-3	Nonylphenol
84852-15-3	Phenol, 4-nonyl-, branched

As would be expected, we were also able to find SDSs for fragrances which indicate that they contain NPEs at levels ranging from 1-10% of the product. Note that SDSs for fragrances most often merely state that the components are proprietary, and thus the examples below represent the rare few which offer more specific details. These are not the result of an exhaustive search, but rather a few examples to indicate that NPEs are currently used in fragrances in significant amounts. We also found numerous examples of SDSs containing NPEs for products labeled as “odor-counteractant” products.

Examples of SDS for fragrances and odor-counteractant products containing NPEs:

Link to a company manufacturing fragrances for car care products which include NPEs CAS # 127087-87-0 on the SDS for the fragrances.

[http://hilustre.com/index.php?category\\_rewrite=shampoo-fragrances&controller=category](http://hilustre.com/index.php?category_rewrite=shampoo-fragrances&controller=category)

Example of New Care Scent interior fragrance SDS containing CAS#: 127087-87-0

<http://hilustre.com/sds/SDS-1090.pdf>

Link to SDS for a company manufacturing automotive Air fresheners containing NPEs: 9016-45-9 in the fragrance.

<http://trans-mate.com/sds/>

Example of Apple Cinnamon Automotive Air Freshener SDS containing CAS # 9016-45-9:

<http://trans-mate.com/pdfs/sds/TM408M.pdf>

Link to odor-counteractant product containing NPE CAS #: 68391-01-5

[http://www.fiberlock.com/sds/Recon%20Extreme%20Duty%20OC-\(3041\)-SDS.pdf](http://www.fiberlock.com/sds/Recon%20Extreme%20Duty%20OC-(3041)-SDS.pdf)

Link to odor-counteractant product containing NPE CAS #: 127087-87-0

[http://www.sunbelt-labs.com/catalog/msds/CINNAMON%20\\_SL-611\\_.pdf](http://www.sunbelt-labs.com/catalog/msds/CINNAMON%20_SL-611_.pdf)

Link to odor-counteractant products containing NPE CAS #:9016-45-9

<http://ridgwayindustries.com/website/wp-content/uploads/2015/05/Classic-Scents.pdf>

<https://images.hillyard.com/IMAGES/MSDS/MSDSHIL00187.pdf>

Summary: NPEs found in fragrance on SDS:

9016-45-9      Poly(oxy-1,2-ethanediyl),  $\alpha$ -(nonylphenyl)- $\omega$ -hydroxy-

127087-87-0      Poly(oxy-1,2-ethanediyl),  $\alpha$ -(4-nonylphenyl)- $\omega$ -hydroxy-, branched

68391-01-5      Nonylphenol ethoxylate

We hope this information is useful to you in further determining the full universe of products that may contain NPEs..

We are especially concerned due to the ubiquity of the use of fragrances in consumer products. The full extent of the use of NPEs in fragranced products, particularly consumer products is currently unknown and needs to be more fully investigated.

Thank you for the opportunity to comment on the implementation of this workplan.

Sincerely,

A handwritten signature in black ink, reading "Alexandra Scranton". The signature is fluid and cursive, with the first name "Alexandra" and the last name "Scranton" clearly distinguishable.

Alexandra Scranton  
Director of Science and Research  
Women's Voices for the Earth

