



AMERICAN PUBLIC HEALTH ASSOCIATION

For science. For action. For health.

April 1, 2016

International Residential Code - Building Code Committee

RE: 2016 Group B – Proposed changes to the International Residential Code – Building; RB152-16

Dear IRC-Building Code Committee member:

On behalf of the American Public Health Association, a diverse community of public health professionals who champion the health of all people and communities, I write in strong support of RB152-16, the proposed addition to International Residential Code Section 316. The proposal would maintain fire safety and enable the safe use of foam plastic insulation without flame retardants below finished exterior grade, which would reduce the potential for human health and environmental harms.

We believe that proposal RB 152-16 is an important opportunity to meet a growing demand for safe, alternative high-performing insulation used below grade without compromising fire safety. The flame retardants currently used in foam plastic insulation are associated with serious, human health risks, including neurological and reproductive impairment, damage to the liver and kidneys, and disruption of the hormone system. The production and disposal of foam plastic insulation releases harmful flame retardants and their toxic combustion by-products to the environment. Workers who manufacture or install these materials, or who demolish buildings, are routinely exposed to flame retardants in insulation and are not warned of the potential for long-term adverse health effects. Furthermore, firefighters and other populations may be adversely affected by combustion products from fires involving foam plastic insulation. By making this update to current code, we can maintain fire safety of buildings while reducing the exposure of individuals and the environment to toxic chemicals.

Reductions in flame retardants in foam plastic insulation where they are not needed would result in large public and worker health benefits by reducing human and environmental exposure to hazardous flame retardants as well as their harmful breakdown and combustion by-products. We therefore urge you to adopt the proposal RB152-16.

Sincerely,

A handwritten signature in black ink that reads "Georges C. Benjamin". The signature is written in a cursive, flowing style.

Georges C. Benjamin, MD
Executive Director