Every baby deserves healthy gear

Where toxics are hiding – and what Babies"R"us must do

Foam-based items like this could contain needlessly added toxic chemicals
Acknowledgements

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Products were purchased by Joan Teach of Learning Disabilities Association of Georgia, Kristina Scott of New Hampshire Learning Disabilities Association, Eliza Walp of Vermont Public Interest Research Group, Tracy Gregoire of the Learning Disabilities Association of Maine, Kim LaBo of the Healthy Legacy Coalition in Minnesota, and Melissa Werle and Nathan Jones of Clean and Healthy New York. Graphic design of report and infographic by Bobbi Chase Wilding.

Financial support provided by Healthy Babies, Bright Futures.

Disclaimer

In this report we name products that likely contain chlorine-based flame retardants based on X-ray fluorescence analysis and labeling. This method does not determine specific chemical additives. It also doesn’t detect nanoscale, phosphorous, or nitrogen-based flame retardant chemicals. We did not evaluate the full range of potentially harmful chemicals known to be used in some children’s products. As such, this report does not recommend any particular product for purchase.

Icons and images

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Icons made by Freepik from www.flaticon.com
It’s not news: toxic chemicals are bad for you. Especially if you are very young. A baby. A toddler. Chemicals in our daily environment can disrupt healthy development and functioning of babies’ brains, reproductive organs, lungs, heart, and skin. We don’t know all of the chemicals that can harm our health – despite forty years of chemicals management laws, the US government only has full testing on 200 of the more than 80,000 chemicals now in the marketplace.

Some chemicals that can cause learning and developmental disabilities, cancer, and infertility are added to products as “flame retardants.” They are supposed to prevent the start of a fire. Toxic flame retardants are so common that every mother and toddler pair tested contained at least one of them. Toddlers had up to five times the levels of their mothers.

That might seem like a worthy trade-off except for this - fire safety scientists have disputed that adding chemicals to foam actually provides any meaningful fire prevention, even when they are in products that are often the first thing to burn, like couches.

Even worse, in the past, a lot of baby gear contained flame retardants, even though these products are not even commonly the first things to catch fire. When was the last time you heard that a fire started because the changing table in the nursery burst into flames?

Changing pads, bouncy seats, booster seats, high chair pads, car seats, nap mats, and portable crib pads have all been found to contain flame retardant chemicals in studies released in the last five years. This is because they are made with polyurethane foam inside, and up until very recently, polyurethane foam makers almost universally added toxic flame retardants to their product.

A recent change in California regulation has made it much easier for furniture makers to meet flammability standards without added chemicals in the interior foam. The new regulation explicitly exempts children’s and baby products from having to meet the standard at all, recognizing that they aren’t the first things to burn.

Now the market is shifting, and leading furniture makers like Ethan Allen, Ashley Furniture and others have pledged to make products without these toxic chemicals. That makes it easier for children’s product makers to access toxic flame retardant-free foam. The questions are: Are retailers ensuring that their products are now flame retardant-free? Are they making sure the safest products are now on store shelves?
Babies"R"Us as a leader?

Retailers can have significant influence over product makers, and should use that power to protect their customers and go beyond government regulation to ensure product safety. In the past, Babies"R"Us and its parent company, Toys"R"Us, have taken some steps to avoid specific toxic chemicals. For example, they removed PVC from bibs, and BPA from baby bottles. In spring 2015, they updated their website to indicate that at some point in 2014 they urged their vendors to look at chemicals identified as hazardous under laws in Washington, Maine, California and the European Union. This is farther than some retailers, but not as far along as buybuy BABY, their closest competitor, or Walmart and Target, retail giants.

But why not just make it easier for every single mom, dad, aunt, uncle, grandparent and friend who wants to get a newborn just what they need?

Given that it is now easy to for manufacturers to source flame-retardant free foam, we wrote to Babies"R"Us, urging them to set a timeline for first ending sale of foam-based products that contain toxic flame retardants, and second, identifying other products for which more work must be done to ensure safe products. (For example, electronic devices generate their own heat, and need to be designed not to catch on fire during normal use. This is definitely not true for high chairs, changing pads, mattresses and nursing pillows). To date, they have not responded.

This contrasts with the other leading baby product retailer. As of January 2015, buybuy BABY and its parent company Bed Bath & Beyond have banned the following chemicals used as flame retardants in products they will accept from vendors for sale:

- Pentabromo diphenyl ether (pentaBDE)*
- Octabromo diphenyl ether (octaBDE)*
- Decabromo diphenyl ether (decaBDE)*
- Tris (2,3-dibromopropyl) phosphate (TDBPP or Brominated TRIS)
- Tris (1,3-dichloro-2-propyl) phosphate (TDCPP)
- Tris (2-chloroethyl) phosphate (TCEP)
- Tris (chloroisopropyl) phosphate (TCPP)

* All three PBDEs are now phased out of production in the US. Penta- and octa-BDE were banned in furniture and electronics in a number of states.
What’s on the shelf?

In the past, studies have documented the presence of a range of flame retardant chemicals in children’s products. For example, in 2011, researchers testing 101 baby products found flame retardants in 80% of them.¹

In Spring 2015, we purchased items from Babies”R”Us stores in Georgia, Maine, Massachusetts, Minnesota, New Hampshire, New York, and Vermont. Using an X-Ray Fluorescence (XRF) Analyzer, we screened items for chlorine and bromine in foam and fabrics to determine if they are likely to contain flame retardant chemicals. Learn more about our methods in Appendix I.

The bad news

We detected chlorine in polyurethane foam, which together with labeling strongly suggests chlorinated flame retardants were being used, - in six items–four models of bassinet or portable crib pads, and two changing pads.

Five of these six items were Babies”R”Us brand – which means they have even greater control over their supply chain than for products made by another company. All six were labeled as complying with the old California TB-117 regulation.

The good news

A number of products we tested passed our screen for flame retardants made with chlorine and bromine. This included:

- Six toddler chairs (all that we tested)
- The foam of three “jumpers” similar to the one pictured here
- Two changing pads
- One bassinet pad
What Babies"R"Us must do

Today's babies should not be paying for mistakes of the past, and Babies"R"Us can prevent their exposure to dangerous, unnecessary chemicals. It's time for Babies"R"Us to use its power as a major retailer to do two key things to protect babies' health:

1) Make it a clear policy not to sell any new padded products with added flame retardants. This includes crib mattresses, sleeping pads (for bassinets, cribs, portable cribs, cradles, etc.), changing pads, high chairs, jumpers, strollers, and foam books.

2) Set a date by which products in these categories containing flame retardants (produced before 2014 or labeled as complying with the old TB-117) will be pulled from store shelves.

3) Hold a dialogue with vendors who provide electronics, car seats, and play tents (which have additional regulations around flammability) about how they can design children's products to meet flammability standards without use of added chemicals.

A call to other retailers

We urge all retailers who sell children's products to take these steps as well. Smaller retailers, who alone lack purchasing power but who are members of the trade association Brixy should work within that association to use that collective power. buybuy BABY, which has set limits on specific flame retardants, should also set a date by which all products they sell are free from these toxic chemicals.
How parents (and others) can take action

- **Avoid products labeled with TB-117 compliance.** This doesn’t guarantee the presence of toxic flame retardants, but it is a strong signal of such. Nor does the TB 117-2013 label guaranteed their absence, but products labeled as meeting TB-117 2013 are more likely not to contain flame retardant chemicals.

- **Ask the retailer for flame-retardant free products.** They may be able to direct you to specific products. If they don’t know, tell them that this matters to you and ask them to pass this message to the manager, or owner (if it’s a small store).

- **Look for items that are labeled as being made without chemical flame retardants.** buybuy BABY includes this information on their website for some items.

- **Ask the retailer if they’ve set a date by which all of the padded products they sell will be free from toxic flame retardants.** They probably won’t have a date – so ask them to set one. Ask them to communicate this up their chain of command, so corporate leadership – whether a small business owner or president of Babies’R’Us – knows how much this matters to their customers.

- **Look for products made in 2014 or later; the later the better.** Newer foam has fewer flame retardants.

- **Avoid older foam products at second hand sales.** PBDEs, a group of toxic flame retardants that were phased out years ago because they decrease children’s IQ, continue to be found in people’s homes and bodies.

- **Pick items that don’t contain polyurethane foam.** Polyurethane foam is made from two components – petroleum (sometimes including a small amount of soybean oil along with the petroleum as a “green” option) and a known carcinogen. Some manufacturers have started using polyethylene foam as an alternative. While it is still made from petroleum, it is an improvement.

- **Save money by minimizing the amount of baby gear you buy –** despite significant marketing efforts by manufacturers and retailers alike, babies don’t need many of the products on the market to be happy, healthy and safe. For example, consider purchasing a portable changing pad that gets used at home as well.
How policymakers can protect babies

Ban the most toxic chemicals used as flame retardants

U.S. Senator Charles Schumer (D-NY) has introduced an initiative called the Children and Firefighters Protection Act of 2015 (S. 1976). This policy would prohibit companies from making, importing, distributing, or selling any children's product or upholstered furniture that contains certain chemicals marketed as flame retardants. The language specifies the following chemicals: TDCPP, TCEP, TBBPA, decaBDE, antimony trioxide, HBCD, TBPH, TBB, chlorinated paraffins, and TCPP. The measure would also require appointment of a Chronic Hazard Advisory Panel to assess the toxicity of potential replacement chemicals.

States should clarify that children’s products should be free from these dangerous, unnecessary chemicals. To date, New York, Vermont, Maryland, Oregon, and Minnesota have banned certain chemicals as flame retardants in children’s products. More work must be done to ensure chemical flame retardants are truly a thing of the past. Known toxic flame retardants, including those made with chlorine, and bromine, and others linked to health problems such as cancer, infertility, and nervous system harm, should be formally excluded from use by law. This will help prevent situations like the use of toxic chlorinated Tris in changing pads in 2015 after it was voluntarily removed from children’s pajamas in the 1970s.
Resources

Market Resources

Getting Ready for Baby
www.gettingready4baby.org
75 partner organizations are calling for baby product retailers to limit toxics on store shelves.

Safe Markets
safemarkets.org
A national collaborative of groups working to shift the market away from hazardous chemicals and toward safer chemicals and products.

Mind the Store
mindtheshope.saferchemicals.org
National campaign working with the top 10 retailers to know, disclose and eliminate the Hazardous 100+ chemicals in products they sell.

The Business/NGO Working Group for Safer Chemicals and Sustainable Materials
bizngo.org
A collaboration of businesses and environmental groups working together for safer chemicals & sustainable materials. Their “Plastics Scorecard” details the chemical footprint of different plastics.

GreenScreen™ for Safer Chemicals
www.cleanproduction.org/Greenscreen.php
A tool for comparative hazard assessment for identifying safer alternatives.

Green Chemistry & Commerce Council
greenchemistryandcommerce.org
A business-to-business network of companies and other organizations working to advance green chemistry across sectors and supply chains.

American Sustainable Business Council
www.asbcouncil.org
The Council is the leading advocacy group working for a sustainable economy. It spans a growing network of business associations across the United States, which represent over 200,000 businesses.

State Policy

Alaska Community Action on Toxics
www.akaction.org

Californians for a Healthy and Green Economy
www.changecalifornia.org

Connecticut: Clean Water Action
www.cleanwateraction.org/ct

Coalition for a Safe & Healthy Connecticut
www.safehealthyct.org

Maine: Environmental Health Strategy Center
www.preventharm.org

LDA of Maine’s Healthy Children’s Project
www.mainhealthychildrensproject.org

Maryland PIRG
marylandpirg.org

Massachusetts: Clean Water Action
www.cleanwateraction.org/ma

Michigan: Ecology Center
www.ecocenter.org

Minnesota: Healthy Legacy
www.healthylegacy.org

Montana: Women's Voices for the Earth
www.womensvoices.org

New York: JustGreen Partnership
www.just-green.org

Clean & Healthy New York
www.cleanhealthyny.org

Oregon Environmental Council
www.oecinline.org

Vermont Conservation Voters
www.vermontconservationvoters.org

Washington Toxics Coalition
watoxics.org

Safer States
www.saferstates.org
Appendix I: Methods and Detailed Results

Products were purchased between January and April 2015 and screened using an Innov-X Alpha X-Ray Fluorescence Analyzer for the presence of bromine or chlorine at ranges between 3,000 ppm and 6%. This device is able to detect elements, not full compounds. The elements bromine and chlorine measured by XRF can serve as proxy indicators of brominated and chlorinated flame retardant chemicals, respectively. Once other likely sources of bromine and chlorine have been ruled out in a sample, the presence of significant spectral peaks for either of these elements indicates a high probability that the sample contains a flame retardant chemical containing the detected element. We used this test information together with labeling in our screen for flame retardant chemicals.

Based on comparisons between XRF analysis and laboratory testing, the Ecology Center was able to correlate chlorine at these levels with chlorinated flame retardant chemicals, as reported in June 2015. However, it is possible, though unlikely, that a different chlorinated chemical is contaminated the polyurethane foam. This is why we discuss results as passing or failing our screening test, and not as containing flame retardant chemicals. The combination of the XRF results and the date of manufacture and/or labeling as being compliant with TB-117, not TB-117 2013, along with the history of tests that found brominated or chlorinated flame retardants in foam used in children’s products, gives us confidence in our results.

Here are the products that failed our screen:

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Product name</th>
<th>Purchase location</th>
<th>Manufacture date</th>
<th>FR label</th>
</tr>
</thead>
<tbody>
<tr>
<td>Babies &quot;R&quot; Us</td>
<td>Portable Crib Pad</td>
<td>ME</td>
<td>2014</td>
<td>TB 116 and 117</td>
</tr>
<tr>
<td>Babies &quot;R&quot; Us</td>
<td>Cradle Pad</td>
<td>NY</td>
<td>2013</td>
<td>TB 116 and 117</td>
</tr>
<tr>
<td>Babies &quot;R&quot; Us</td>
<td>bassinet pad (31 in x 18 in. x 1 in)</td>
<td>NH</td>
<td>2012</td>
<td>TB 117</td>
</tr>
<tr>
<td>Babies &quot;R&quot; Us</td>
<td>Bassinet Pad (27 in x 14.5 in x 1 in.)</td>
<td>NY</td>
<td>2013</td>
<td>TB 116 and 117</td>
</tr>
<tr>
<td>Babies &quot;R&quot; Us</td>
<td>Contoured Changing Pad</td>
<td>MN</td>
<td>2013</td>
<td>TB 116 and 117</td>
</tr>
<tr>
<td>Summer</td>
<td>Change’n Play</td>
<td>NY</td>
<td>2012</td>
<td>TB 117</td>
</tr>
</tbody>
</table>
References

1 U.S. EPA issued a September 2015 hazard analysis of flame retardant chemicals. In addition to documenting health hazards for many of the chemicals, it identifies data gaps for all. 


3 ibid

4 For example: see which furniture makers report themselves flame retardant free: www.ceh.org/residential-furniture/

   pubs.acs.org/doi/full/10.1021/es2007462
The Getting Ready for Baby campaign is a collaborative effort of 75 organizations calling on the nation’s largest baby product retailers to use their position as market leaders to protect babies from toxic chemicals. Everyone, regardless of their budget or their knowledge about toxicity of products, should be able to walk into a baby product store and be confident that their purchases will not pose threats to children's health. The campaign calls upon baby product retailers – especially market leaders Babies”R”Us and buybuy BABY – to adopt policies that require product makers to know and disclose the chemicals and materials they use, and to phase out the use of toxic chemicals.

www.gettingready4baby.org

Clean and Healthy New York is an environmental health advocacy organization with a mission to advance policy and market changes that promote safer chemicals, a sustainable economy, and a healthier world.

www.cleanhealthyny.org
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