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TOX/2019/23

COMMITTEE ON TOXICITY OF CHEMICALS IN FOOD, CONSUMER PRODUCTS AND THE ENVIRONMENT (COT)

Committee statement on phosphate-based flame retardants and the potential for neurodevelopmental toxicity – second draft

1. This paper presents a second draft COT statement on the potential for developmental toxicity, in particular neurodevelopmental toxicity, of phosphate-based flame retardants, following the discussion at the October 2018 and March 2019 meetings. This draft incorporates as tracked changes the amendments requested at the March 2019 meeting.
2. We are aware of a recent longitudinal birth cohort study by Doherty et al (2019) that investigated PFR metabolites in maternal urine during pregnancy and behavioural development in their offspring at 36 months. 199 mother-child pairs were recruited in the study from pre-natal clinics before 20 weeks of gestation. Women were recruited if they were English-speaking, older than 16 years of age, carrying a singleton pregnancy and intending to deliver at a North Carolina hospital. PFRs and metabolites were measured in urine samples collected at 26-29 weeks' gestation. The children's behaviour was assessed using the Behavioural Assessment System for Children (BASC-2) parent-rating scale for pre-school children (PRS-P). The PRS-P is a parent-completed questionnaire that reflects the parent's perceptions of their child's behaviour, including both positive and negative behavioural qualities. It is unclear whether data were adjusted to control for exposure to other neurotoxicants. Authors reported that bis(1,3-dichloro-2-propyl phosphate) (BDCIPP) and diphenyl phosphate (DPHP) concentrations were associated with adverse effects, isopropyl-phenyl phenyl phosphate (ip-PPP) concentrations with protective effects, and 1-hydroxyl-2-propyl bis(1-chloro-2-propyl) phosphate (BCIPHIPP) with no behavioural effects. Overall, authors concluded that greater maternal exposure to some PFRs during pregnancy may be associated with adverse behavioural development in children such as withdrawal, attention problems and other behavioural issues.
3. This finding correlates with other epidemiological data described in previous papers [TOX/2018/39](#) and [TOX/2019/09](#). A short sentence has been added in paragraph 25 of the statement alongside the summary of the other epidemiological data.
4. Members are invited to comment on the structure and contents of the draft statement.

**NCET at WRc/IEH-C under contract supporting the PHE Secretariat
May 2019**

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TOX/2019/23 Annex A

COMMITTEE ON TOXICITY OF CHEMICALS IN FOOD, CONSUMER PRODUCTS AND THE ENVIRONMENT (COT)

Committee statement on phosphate-based flame retardants and the potential for neurodevelopmental toxicity

Second draft Committee statement.

**NCET at WRc/IEH-C under contract supporting the PHE Secretariat
May 2019**

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COMMITTEE ON TOXICITY OF CHEMICALS IN FOOD, CONSUMER PRODUCTS AND THE ENVIRONMENT (COT)

Committee statement on phosphate-based flame retardants and the potential for neurodevelopmental ~~developmental~~ toxicity v0-2

Background

1. Due to the stringent requirements of the Furniture and Furnishings (Fire) (Safety) Regulations introduced in 1988 in the UK, the use of flame retardants is greater in the UK than the rest of Europe.
2. Until recently, brominated flame retardants (BFRs) such as polybrominated diphenyl ethers (PBDEs) were the most common chemical flame retardant used for furnishing and textiles (Hendriks and Westerink, 2015). In 2004, penta-BDE and octa-BDE were banned in the European Union (EU) based on their neurotoxic properties, bioaccumulation and persistence (Noyes and Stapleton, 2014); mixtures of deca-BDE have been restricted in the EU since 2008; and in 2009, PBDEs were included in the Persistent Organic Pollutants (POPs) list (Noyes and Stapleton, 2014).
3. The restrictions on PBDEs have led to an increase in alternative chemical flame retardants (Dodson et al., 2012; Stapleton et al., 2011), some of which include phosphate-based flame retardants (PFRs), or commercial mixtures of PFRs and non-PBDE BFRs, e.g. Firemaster 550®¹ (Dodson et al., 2012; Rock et al., 2018).
4. PFRs show some structural similarity to other classes of organophosphates, such as organophosphate (OP) pesticides, which have been shown to interfere with neurodevelopment by cholinergic and noncholinergic pathways (Pope, 1999). Reviews of available toxicity data for some PFRs have been conducted and where adequate data were available, health based guidance values have been derived (ATSDR, 2012; CPSC, 2006; IPCS, 1997). Furthermore, a hazard screening of 88 PFR components has also been conducted (Danish EPA, 2016). The United States Consumer Product Safety Commission (CPSC) and the Agency for Toxic Substances and Disease Registry (ATSDR) identified children as a potentially susceptible population to PFR exposure (ATSDR, 2012; CPSC, 2006).
5. Therefore, the Committee was asked for an opinion on the potential for PFRs to cause developmental toxicity, and in particular neurodevelopmental toxicity.

¹ Firemaster 550® is a mixture of two brominated compounds (bis (2-ethylhexyl)-2,3,4,5-tetrabromophthalate (TBPH) and 2-ethylhexyl-2,3,4,5-tetrabromobenzoate (TBB)) and two phosphate-based compounds (triphenyl phosphate (TPHP) and a mixture of isopropylated triarylphosphate isomers (ITPs)) (Rock et al., 2018).

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Introduction to PFRs

6. PFRs have a structural similarity with OP pesticides as they share the same generic OP chemical structure (Dishaw et al., 2014) (Figure 1). The generic structure is comprised of a central phosphorus atom (P) with a phosphoric (=O) bond, a leaving group (X) and two other side groups (R1 and R2) (Elersek and Filipic, 2011).

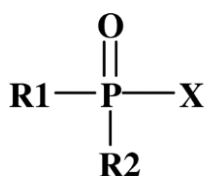


Figure 1. Generic structure of organophosphates

7. PFRs may be grouped into non-halogenated (e.g. triphenylphosphate (TPHP) and tricresylphosphate (TCP)), and halogenated PFRs (e.g. [tris\(2-chloroethyl\) phosphate \(TCEP\)](#), [tris \(2-chloroisopropyl\) phosphate \(TCPP\)](#), and [tris \(1,3-dichloro-2-propyl\) phosphate \(TDCPP\)](#) (IPCS, 1997). More information on the chemical structures and physico-chemical properties of these compounds is presented in [TOX/2018/39](#).

Cholinergic and non-cholinergic mechanisms of neurotoxicity

8. OP compounds ~~such as OP pesticides and PFRs~~ have been associated with both cholinergic and non-cholinergic mechanisms of neurotoxicity as described in [TOX/2018/39](#) and [TOX/2019/09](#).

9. The cholinergic mechanism functions via inhibition of AChE and is generally well researched and described (Elersek and Filipic, 2011). OP neurotoxicity occurs via the phosphorylation and subsequent inhibition of AChE due to a nucleophilic reaction of the leaving group to a critical serine residue within the AChE active site. The reverse hydrolysis reaction to reactivate the AChE is slow resulting in AChE inhibition. This inhibition causes an accumulation of the neurotransmitter acetylcholine and an overstimulation of cholinergic receptors (Pope, 1999).

10. The inhibition of AChE is dependent on three main factors; 1) the affinity of the OP for the AChE binding site; 2) strength of the bond between the phosphor moiety and the leaving group; and 3) the rate of the hydrolysis reaction between the active site serine and the phosphor moiety that leads to regeneration of the activity of the enzyme. Potent neurotoxins, such as nerve agents, have a high affinity for the AChE inhibition binding site, as they have an easily cleaved bond between the phosphor moiety and the leaving group and slow hydrolysis of the serine-phosphor bond once formed (Elersek and Filipic, 2011; Moshiri *et al.*, 2012). In contrast, the leaving groups of less toxic OP compounds, such as pesticides, have a low affinity for the AChE active site, usually due to the presence of alkyl or aryl functional groups

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or side groups, resulting in less potent neurotoxicity (Elerseck and Filipic, 2011). In addition, some PFRs generally have functional larger alkyl chains in the leaving/side groups, not present in PFRs, that require metabolic activation before exerting effects at AChE (Elerseck and Filipic, 2011). As PFRs generally have larger alkyl chains in the leaving/side groups, they have may also exhibit reduced affinity for AChE and therefore limited neurotoxicity of PFRs via inhibition of AChE may be anticipated. Dishaw (2015) suggested that PFRs do not have a strong binding affinity for AChE and exhibit low acute toxicity compared with OP pesticides.

11. An early study tested the inhibitory activity of various halogenated and non-halogenated PFRs on AChE, isolated from organs of the electric ray *Torpedo ocellata*, at concentrations that were considered to be realistic in terms of likely human exposure. The PFRs tested showed 70-115 % of AChE activity and 75-110 % AChR binding compared to OP pesticide control diisopropyl phosphorofluoridate with 0.3 % AChE activity and 99.8 % AChR binding. Authors therefore reported that PFRs are not potent AChE inhibitors, when compared to the OP pesticide diisopropyl phosphorofluoridate used as the control (Eldefrawi et al., 1977)(see also TOX/2018/39).

12. Other factors that influence the interaction of OPs with AChE are discussed in TOX/2019/09. The Committee considered that, in general, PFRs were only weak inhibitors of AChE and therefore this mechanism was not of importance for PFRs. Other authors noted that human exposure to PFRs is usually chronic, low level exposure, rather than acute exposure to high doses that are associated with OP pesticide cholinergic toxicity (Abou-Donia et al., 2016). Other factors that influence the interaction of OPs with AChE are discussed in TOX/2019/09. The Committee considered that, in general, PFRs appear to be, at most, only weak inhibitors of AChE.

13. The non-cholinergic mechanisms of OP neurotoxicity are less understood. Some non-cholinergic mechanisms are thought to include the inhibition of neuropathy target esterase (NTE), which leads to Organophosphate Induced Delayed Neurotoxicity (OPIDN), a neurodegenerative disorder characterised by a latent period of several weeks between exposure and the manifestation of neurological effects (e.g. ataxia or paralysis) (Abou-Donia et al., 2016). Sufficient NTE must be irreversibly inhibited before OPIDN develops (Ehrich et al., 1997). Therefore the delay in initiation of neurological effects is thought to be due to this progressive inhibition of NTE by reaction with OP compounds (Jokanovic et al., 2011).

14. A number of structural features appear to be essential for the neurotoxicity observed in OPIDN including the presence of an ortho-methyl group in an aromatic series, (as seen in ortho-TCP). This is readily metabolised to a cyclic phosphate which is similar in structure to the potent neurotoxin, saligenin, that inhibits NTE. Such metabolism must occur for the chemical to induce OPIDN. Ortho-TCP does have such a structure, but it is not used as a flame retardant due to the potential for neurotoxicity, though it may be present as a minor contaminant of the mixed-isomer

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~~TCP PFR be neurotoxic.~~ Esters with no ortho-substituents, such as TPHP, are not neurotoxic ~~by this mechanism as the necessary~~as metabolism does not occur. In addition, ~~this type of~~ neurotoxicity is decreased by further substitution on the phenyl ring with additional methyl groups in the meta or para positions, ~~e.g. meta- or para-TCP,~~ by providing alternative hydroxylation pathways without the formation of a cyclic ester due to steric hindrance. ~~Finally, the (i.e. meta-TCP).~~ The size of the substituent on the ortho position also affects the neurotoxicity potency. Larger and more branched substituents e.g. a butyl group, interfere with metabolic activation to neurotoxic metabolites, due to steric hindrance (ATSDR, 2012; Weiner and Jortner, 1999). ~~The Committee noted that the chicken is a model for assessing the development of OPIDN and the available study of some PFRs showed that they generally do not induce OPIDN in chickens (Weiner and Jortner, 1999).~~

15. Other non-cholinergic mechanisms may include the neurotransmitter gamma-aminobutyric acid (GABA), as various studies have demonstrated ~~some PFRs such as TCEP and TPHP~~ exert antagonistic effects on GABA. ~~Umezū et al. (1998) reported that TCEP was a GABA antagonist and not a cholinergic agonist in mice. (Umezū et al., 1998).~~ Gant et al. (1987) ~~investigated the effect of~~ have shown that PFRs including TPHP, ~~Antiblaze (a mixture of cyclic phosphates) and Fyrol-CEF on GABA receptors or voltage-dependent chloride channel, as well as testing ortho-TCP.~~ Authors reported that TPHP and ortho-TCP can bind to the GABA regulated chloride channel with IC₅₀s 18 and ~~< 10 µM less than 10µM,~~ respectively. This property is unrelated to AChE inhibition and is not shared by the OP neurotoxic agents with the exception of soman that had an IC₅₀ of 24 µM. ~~The authors concluded that although some PFRs inhibit GABA receptor function and binding to chloride channels, there is a poor correlation with delayed neurotoxicity. Nevertheless, such inhibition may contribute to their toxicity.~~

16. Dishaw et al. (2011) compared the ~~effects neurotoxicity~~ of a number of PFRs to chlorpyrifos using PC12 cells ~~by investigating differentiation into cholinergic or dopaminergic phenotypes, changes, an in DNA synthesis, oxidative stress and cell growth. vitro model for neurodevelopmental toxicity.~~ Further details are described in TOX/2019/09. ~~The authors~~ TOX/2019/09. ~~Authors~~ reported that the potency of PFRs for ~~neurotoxicity neurodevelopment toxicity~~ was similar or greater than that of ~~the an OP pesticide comparator. (chlorpyrifos).~~ Overall, ~~the~~ authors concluded that PFRs may also elicit similar toxicity to OP pesticides based on non-cholinergic mechanisms. ~~(Dishaw et al., 2014; Dishaw et al., 2014).~~ The Committee noted, however, that the high concentrations (50 µM) of PFRs were used in this study ~~which~~ are not considered to be realistic compared to human exposure to PFRs. ~~Moreover, as PC12 cells do not express cytochrome P450 enzymes and no metabolic activation system was used in the cell culture, it is difficult to extrapolate these results to the in vivo situation.~~

17. In a later paper studying effects in early life stage zebrafish, PFRs were demonstrated to elicit overt and neurodevelopmental toxicity at concentrations similar to, or below that of chlorpyrifos (PFRs 3.3-10 µM; chlorpyrifos 10 µM (Dishaw et al., 2014).

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18. Overall, the Committee concluded that, based on structural considerations, a non-cholinergic mode of action was unlikely for PFRs. Based on their low potency, PFRs are unlikely to cause neurotoxicity at human exposure levels via effects on GABA receptors.

Exposure to PFRs

Potential routes of exposure

~~18-19.~~ PFR exposure occurs through inhalation and ingestion of dust released from furnishings and consumer products, and through dermal contact with the products in which PFRs are found (Ali et al., 2012; Dishaw, 2015; Schreder et al., 2016; Zheng et al., 2017). Infants and young children have a greater potential for oral exposure due to hand-to-mouth and thumb-sucking behaviour (Butt et al., 2016), as well as a greater potential for both inhalation exposure, due to increased breathing rates, and dermal exposure, due to increased contact with treated textiles (Abdallah et al., 2015) and crawling activity on carpets (Dishaw, 2015). TCEP and TPHP have been detected in human breast milk also indicating the potential for oral PFR exposure for infants during lactation (Kim et al., 2014).

~~19-20.~~ Exposure estimates and biomonitoring results are described in [TOX/2018/39](#).

~~20-21.~~ Exposure to flame retardants, not specifically PFRs, from dust has been estimated based on the US Environmental Protection Agency (EPA) ingestion rates of 100 mg dust/day and 20 mg dust/day for children and adults respectively. The average cumulative exposure to flame retardants from dust ingestion was estimated to be 16 µg/day for children (1.6 µg/kg bw/day for a 10 kg child) and 0.3 µg/day for adults (0.004 µg/kg bw/day for a 70 kg adult) (Stapleton et al., 2009). Authors reported that PBDEs and TPHP and TDCPP accounted for the majority of exposure.

Toxicity of PFRs

Sensitive groups for this assessment

~~21-22.~~ Based on the greater potential for exposure, infants and young children are being considered for this assessment, as well as potential effects on the developing fetus.

Human data

~~22-23.~~ The effect of PFRs in humans was discussed in [TOX/2018/39](#) and [TOX/2019/09](#), including the endpoints of neurotoxicity, developmental toxicity, teratogenicity, and endocrine effects.

~~23-24.~~ Limited human data indicate a ~~possiblepotential~~ correlation between PFR exposure and reduced cognitive performance and poorer social behaviours, although the Committee noted some inconsistency in the findings between studies.

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24. —Lipscomb et al. (2017), in a small cross sectional study, assessed personal exposure to flame retardants of 69 3-5 year old children for 7 days. Total PFRs (sum of TCEP, TCPP, TDCPP and TPHP) were associated with less responsibility ($p < 0.001$) and greater externalising problems ($p < 0.05$). In another cross sectional study, similar results of reduced cognitive performance and exposure to TCEP were reported in 6-8 year old children (Hutter et al., 2013). In the Center for the Health Assessment of Mothers and Children of Salinas (CHAMACOS) longitudinal birth cohort study, higher total PFR metabolites² measured in maternal urine during pregnancy and DPHP alone were associated with decreased working memory and reduced intelligence quotient (IQ) scores of the children at 7 years old. Exposures to other neurotoxicants (p,p'-dichlorodiphenyltrichloroethylene (DDT) and p,p'-dichlorodiphenyldichloroethylene (DDE) that had been found to be related to child IQ or attention-deficit/hyperactivity disorder in the cohort were controlled for in the study. Authors concluded that due to the widespread exposure to PFRs among pregnant women and children further (Castorina et al., 2017).

25. While different outcomes in the human studies are needed with a wider range of biochemical measurements to investigate the potential neurodevelopmental effects of PFRs (Castorina et al., 2017). In another longitudinal birth cohort study, Doherty et al. (2019) investigated PFR metabolites in maternal urine during pregnancy and behavioural development in their offspring at 36 months. They found bis(1,3-dichloro-2-propyl phosphate) (BDCIPP) and diphenyl phosphate (DPHP) concentrations were associated with adverse effects, isopropyl-phenyl phenyl phosphate (ip-PPP) concentrations with protective effects, and 1-hydroxyl-2-propyl bis(1-chloro-2-propyl) phosphate (BCIPHIPP) with no behavioural effects.

~~25-26. Whilst identified as significant, they all the epidemiological studies to date found some positive associations relating to cognitive function or performance of children, the specific outcomes identified were often different. The Committee commented on the limited number of epidemiological studies available, with half of them being cross sectional and thus limited by their design, the potential for multiple testing given the large number of cognitive/behavioural domains investigated against the various PFRs, and finally, that only in one study was it clear there that in some cases it was not clear whether these studies had been sufficient adjustments sufficiently adjusted for potential exposure to other chemicals or factors that may affect cognitive performance.~~

In vivo/in vitro data

~~26-27. A number of PFRs are reported to induce signs of neurotoxicity in acute and repeat dose studies (ATSDR, 2012). However, no juvenile neurotoxicity studies in experimental animals were located. ATSDR (2012) considered the results of oral embryo-fetal studies conducted in experimental animals with TCEP, TDCPP, TPHP, TCPP, TCP, tri-n-butyl phosphate (TnBP) and TBEP and concluded that PFRs are not fetotoxic or teratogenic even at doses that cause maternal toxicity (reduced body~~

² sum of bis(1,3-dichloro-2-propyl) phosphate (BDCIPP), diphenyl phosphate (DPHP), isopropyl-phenyl phenyl phosphate (ip-PPP) and tertbutylphenyl-phenyl phosphate (tb-PPP)

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weight). The highest dose tested in all studies was 1,500 mg/kg bw/day. TCEP did induce brain lesions in the hippocampus and thalamus in a 16 week study in rats (175 mg/kg bw/day TCEP), and in the brain stem and cerebral cortex in a 2 year study in rats (88 mg/kg bw/day TCEP). Females appeared to be more sensitive than males. No lesions were reported with any of the other PFRs. ATSDR derived an intermediate Minimal Risk Level (oral) of 0.6 mg/kg bw/day based on necrosis of the hippocampal neurones in female rats (ATSDR, 2012). ~~TBEP.~~

27-28. There is some evidence of limited PFR accumulation in the placenta in the rat. Rats treated with up to 3.3 mg/kg bw/day Firemaster (comprising brominated flame retardant and TPHP) accumulated TPHP in the placenta, although to a lesser degree ~~than compared with~~ the brominated components. The mean placental TPHP levels were 6.5 ± 2.02 ng/g w/w in placentas of male foetuses ~~placenta~~. However, there is no evidence of placental transfer of PFRs to the fetus as placental levels were higher than fetal levels. ~~The authors concluded that the placenta may be a critical target organ for some PFRs and may impact fetal development~~ (Baldwin et al., 2017; Phillips et al., 2016).

Discussion

28-29. PFRs are found ubiquitously in household dust and biomonitoring data suggests that exposure is widespread and increasing ~~over time~~ overtime. Young children and infants have been identified as a ~~potentially particularly~~ susceptible subpopulation ~~due to~~ for greater exposure via the oral, inhalation and dermal routes. There is little information available on the levels of exposure to PFRs, but there was concern for potential exposures e.g. to infants sleeping on new mattresses.

29-30. PFRs share a structural similarity with OP pesticides and other OP compounds. However, the presence of alkyl or aryl functional groups in PFRs results in these ~~as~~ leaving groups, ~~as seen in PFRs, is thought to result in the leaving group~~ having a lower affinity for the AChE active site, thereby causing less inhibition and subsequent neurotoxicity compared with OP pesticides. Some *in vitro* and *in vivo* studies have demonstrated AChE inhibition by PFRs but only at high concentrations. The Committee considered the concentrations used were not relevant to human exposure. Although no IC₅₀ data were available, the Members considered that PFRs ~~were~~ appear to be only weak inhibitors of ~~AChE~~ AChE, ~~at most~~, based on the ~~papers~~ paper by Abou-Donia et al. (2016) and Eldefrawi et al. (1977). ~~(Eldefrawi et al., 1977).~~

30-31. It has additionally been hypothesised that PFRs may also elicit similar toxicity as OP pesticides ~~by~~ based on non-cholinergic mechanisms. ~~although high concentrations, not representative of human exposure, were required for PFRs to elicit OPIDN. Some PFRs and OP pesticides cause OPIDN and OPICN,~~ via the inhibition of NTE. A number of structural features are essential for this neurotoxicity to occur, including the presence of an ortho-methyl group on the aromatic ring, as seen in ortho-TCP. ~~This allows metabolism to a minor contaminant of the mixed-isomer TCP PFR neurotoxic metabolite.~~ PFRs with no ortho-substituents, such as

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TPHP₁ are not neurotoxic via inhibition of NTE. Moreover, those with substituents in the meta or para positions, and larger more branched PFRs, such as those with longer chain substituents, exhibit less neurotoxicity than those with small ortho-substituents.

~~31-32.~~ TPHP and commercial TCP (isomeric mixture) are both commonly used flame retardants. Due to its structure (lack of ortho-methyl groups) TPHP is not neurotoxic via inhibition of NTE. The commercial TCP mixture contains ortho-TCP only as a contaminant at very low concentrations (<0.1 %). Studies have demonstrated that commercial TCP had reduced neurotoxic potential compared to ortho-TCP alone. Because of the activity of ortho-TCP, the Committee recommends continued efforts to keep concentrations of this isomer in commercial mixtures low. In addition, due to its structure (lack of ortho-methyl groups) TPHP is not neurotoxic via inhibition of NTE.

~~32-33.~~ There is some evidence a small potential for neurotoxicity of some PFRs to occur through inhibition of the GABA regulated chloride channel. Inhibition of this channel appears to be a property of a small number of PFR--type molecules tested at high concentrations, and is not shared with nerve agents.

34. Overall, the Committee agreed that the data presented did not support a plausible mechanism for any neurotoxic effect of PFRs at human exposure levels through inhibition of AChE, NTE or GABA receptors. Adequately conducted studies would be needed to exclude potential effects via other mechanisms.

~~33-35.~~ A number of epidemiology studies in children were presented, suggesting some potential effects on cognitive function in children. There were, however, inconsistencies between studies. The Committee considered the CHAMACOS study to be a well-designed cohort study. Different outcomes were identified as being significant across the epidemiological evidence, although all were generally related to cognitive function or performance of children.

~~34-36.~~ Although the CHAMACOS study appeared to adjust for other neurotoxicants that are related to child IQ or attention-deficit/hyperactivity disorder in the cohort, it was unclear whether other studies had adjusted sufficiently for potential exposure to other chemicals or factors affecting cognitive performance.

~~35-37.~~ Overall, the Committee noted that the mode of action for any potential neurotoxic effect is unlikely to be the same as for OP pesticides.

COT conclusion

~~36-38.~~ Overall, the Committee determined that the experimental evidence suggested that PFRs were not similar to OPs in terms of activity and therefore there was a lack of biological plausibility of the potential for PFRs to exhibit similar effects to OPs. There was no evidence of a direct developmental effect of PFRs. However, the limited epidemiological evidence available has suggested a-potential

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neurodevelopmental ~~effect~~effect, although there were limitations to this evidence and a lack of specificity in the relationships identified.

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References

- Abdallah, M.A.E., Pawar, G. and Harrad, S. (2015) Evaluation of in vitro vs. in vivo methods for assessment of dermal absorption of organic flame retardants: A review. *Environment International*, 74, 13-22.
- Abou-Donia, M.B., Salama, M., Elgama, M., Elkholi, I. and Wang, Q. (2016) Organophosphorus Flame Retardants (OPFR): Neurotoxicity. *Journal of Environment and Health Sciences*, 2, 1-30.
- Ali, N., Van den Eede, N., Dirtu, A.C., Neels, H. and Covaci, A. (2012) Assessment of human exposure to indoor organic contaminants via dust ingestion in Pakistan. *Indoor air*, 22, 200-211.
- ATSDR (2012) Toxicological profile for phosphate ester flame retardants. US Department of Health and Human Services. Public Health Service. Agency for Toxic Substances and Disease Registry. Atlanta, Georgia.
- Baldwin, K.R., Phillips, A.L., Horman, B., Arambula, S.E., Rebuli, M.E., Stapleton, H.M. and Patisaul, H.B. (2017) Sex Specific Placental Accumulation and Behavioral Effects of Developmental Firemaster 550 Exposure in Wistar Rats. *Scientific Reports*, 7.
- Butt, C.M., Hoffman, K., Chen, A., Lorenzo, A., Congleton, J. and Stapleton, H.M. (2016) Regional comparison of organophosphate flame retardant (PFR) urinary metabolites and tetrabromobenzoic acid (TBBA) in mother-toddler pairs from California and New Jersey. *Environment international*, 94, 627-634.
- Castorina, R., Bradman, A., Stapleton, H.M., Butt, C., Avery, D., Harley, K.G., Gunier, R.B., Holland, N. and Eskenazi, B. (2017) Current-use flame retardants: Maternal exposure and neurodevelopment in children of the CHAMACOS cohort. *Chemosphere*, 189, 574-580.
- CPSC (2006) CPSC Staff Preliminary Risk Assessment of Flame Retardant (FR) Chemicals in Upholstered Furniture Foam. United States Consumer Product Safety Commission. Bethesda, MD 20814.
- Danish EPA (2016) Environmental and health screening pro-files of phosphorous flame retardants. A LOUS follow-up project. Environmental project No. 1823, 2016. Ministry of Environment and Food of Denmark. The Danish Environmental Protection Agency. ISBN no: 978-87-93435-23-0. Copenhagen, Denmark.
- Dishaw, L.V. (2015) Halogenated Organophosphate Flame Retardants: Developmental Toxicity and Endocrine Disruptive Effects. Dissertation submitted in partial fulfillment of the requirements for the degree of Doctor of Philosophy in the Department of Environment in the Graduate School of Duke University.
- Dishaw, L.V., Hunter, D.L., Padnos, B., Padilla, S. and Stapleton, H.M. (2014) Developmental exposure to organophosphate flame retardants elicits overt toxicity and alters behavior in early life stage zebrafish (*danio rerio*). *Toxicological Sciences*, 142, 445-454.

This is a draft statement for discussion.

It does not represent the views of the Committee and should not be quoted, cited or reproduced.

Dishaw, L.V., Powers, C.M., Ryde, I.T., Roberts, S.C., Seidler, F.J., Slotkin, T.A. and Stapleton, H.M. (2011) Is the PentaBDE replacement, tris (1,3-dichloro-2-propyl) phosphate (TDCPP), a developmental neurotoxicant? Studies in PC12 cells. *Toxicol Appl Pharmacol*, 256, 281-9.

Dodson, R.E., Perovich, L.J., Covaci, A., Van Den Eede, N., Ionas, A.C., Dirtu, A.C., Brody, J.G. and Rudel, R.A. (2012) After the PBDE phase-out: A broad suite of flame retardants in repeat house dust samples from California. *Environmental Science and Technology*, 46, 13056-13066.

Doherty, B.T., Hoffman, K., Keil, A.P., Engel, S.M., Stapleton, H.M., Goldman, B.D., Olshan, A.F. and Daniels, J.L. (2019) Prenatal exposure to organophosphate esters and cognitive development in young children in the Pregnancy, Infection, and Nutrition Study. *Environ Res*, 169, 33-40.

Ehrich, M., Correll, L. and Veronesi, B. (1997) Acetylcholinesterase and neuropathy target esterase inhibitions in neuroblastoma cells to distinguish organophosphorus compounds causing acute and delayed neurotoxicity. *Fundam Appl Toxicol*, 38, 55-63.

Eldefrawi, A.T., Mansour, N.A., Brattsten, L.B., Ahrens, V.D. and Lisk, D.J. (1977) Further toxicologic studies with commercial and candidate flame retardant chemicals. Part II. *Bull Environ Contam Toxicol*, 17, 720-6.

Elerseck, T. and Filipic, M. (2011) Organophosphorous Pesticides - Mechanisms of Their Toxicity, Pesticides - The Impacts of Pesticides Exposure. Prof. Margarita Stoytcheva (Ed.), ISBN: 978-953-307-531-0.

Gant, D.B., Eldefrawi, M.E. and Eldefrawi, A.T. (1987) Action of organophosphates on GABAA receptor and voltage-dependent chloride channels. *Fundam Appl Toxicol*, 9, 698-704.

Hendriks, H.S. and Westerink, R.H. (2015) Neurotoxicity and risk assessment of brominated and alternative flame retardants. *Neurotoxicol Teratol*, 52, 248-69.

Hutter, H.P., Haluza, D., Piegler, K., Hohenblum, P., Fröhlich, M., Scharf, S., Uhl, M., Damberger, B., Tappler, P., Kundi, M., Wallner, P. and Moshhammer, H. (2013) Semivolatile compounds in schools and their influence on cognitive performance of children. *International journal of occupational medicine and environmental health*, 26, 628-635.

IPCS (1997) Flame Retardants: A General Introduction. Environmental Health Criteria 192. International Programme on Chemical Safety. World Health Organization, Geneva. ISBN: 92 4 157192 6.

Jokanovic, M., Kosanovic, M., Brkic, D. and Vukomanovic, P. (2011) Organophosphate induced delayed polyneuropathy in man: an overview. *Clin Neurol Neurosurg*, 113, 7-10.

Kim, J.W., Isobe, T., Muto, M., Tue, N.M., Katsura, K., Malarvannan, G., Sudaryanto, A., Chang, K.H., Prudente, M., Viet, P.H., Takahashi, S. and Tanabe, S. (2014)

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Organophosphorus flame retardants (PFRs) in human breast milk from several Asian countries. *Chemosphere*, 116, 91-97.

Lipscomb, S.T., McClelland, M.M., MacDonald, M., Cardenas, A., Anderson, K.A. and Kile, M.L. (2017) Cross-sectional study of social behaviors in preschool children and exposure to flame retardants. *Environmental Health: A Global Access Science Source*, 16.

Moshiri, M., Darchini-Maragheh, E. and Balali-Mood, M. (2012) Advances in toxicology and medical treatment of chemical warfare nerve agents. *Daru : journal of Faculty of Pharmacy, Tehran University of Medical Sciences*, 20, 81-81.

Noyes, P.D. and Stapleton, H.M. (2014) PBDE flame retardants. *Endocrine Disruptors*, 2, e29430.

Phillips, A.L., Chen, A., Rock, K.D., Horman, B., Patisaul, H.B. and Stapleton, H.M. (2016) Editor's Highlight: Transplacental and Lactational Transfer of Firemaster(R) 550 Components in Dosed Wistar Rats. *Toxicological sciences : an official journal of the Society of Toxicology*, 153, 246-257.

Pope, C.N. (1999) Organophosphorus pesticides: do they all have the same mechanism of toxicity? *J Toxicol Environ Health B Crit Rev*, 2, 161-81.

Rock, K.D., Horman, B., Phillips, A.L., McRitchie, S.L., Watson, S., Deese-Spruill, J., Jima, D., Sumner, S., Stapleton, H.M. and Patisaul, H.B. (2018) EDC IMPACT: Molecular effects of developmental FM 550 exposure in Wistar rat placenta and fetal forebrain. *Endocrine Connections*, 7, 305-324.

Schreder, E.D., Uding, N. and La Guardia, M.J. (2016) Inhalation a significant exposure route for chlorinated organophosphate flame retardants. *Chemosphere*, 150, 499-504.

Stapleton, H.M., Klosterhaus, S., Eagle, S., Fuh, J., Meeker, J.D., Blum, A. and Webster, T.F. (2009) Detection of organophosphate flame retardants in furniture foam and U.S. house dust. *Environmental Science and Technology*, 43, 7490-7495.

Stapleton, H.M., Klosterhaus, S., Keller, A., Ferguson, P.L., Van Bergen, S., Cooper, E., Webster, T.F. and Blum, A. (2011) Identification of flame retardants in polyurethane foam collected from baby products. *Environmental Science and Technology*, 45, 5323-5331.

Umezū, T., Yonemoto, J., Soma, Y. and Suzuki, T. (1998) Tris(2-chloroethyl)phosphate increases ambulatory activity in mice: pharmacological analyses of its neurochemical mechanism. *Toxicol Appl Pharmacol*, 148, 109-16.

Weiner, M.L. and Jortner, B.S. (1999) Organophosphate-induced delayed neurotoxicity of triarylphosphates. *Neurotoxicology*, 20, 653-73.

Zheng, X., Qiao, L., Covaci, A., Sun, R., Guo, H., Zheng, J., Luo, X., Xie, Q. and Mai, B. (2017) Brominated and phosphate flame retardants (FRs) in indoor dust from different microenvironments: Implications for human exposure via dust ingestion and dermal contact. *Chemosphere*, 184, 185-191.