



Gezondheidsraad

# Reactie Gezondheidsraad op commentaar conceptadvies Tricresylfosfaat

Response Health Council to comments  
draft report *Tricresylphosphate*

## Reactie op commentaar Dr. Daniels (NIOSH)

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Op 13 november 2023 heeft de Gezondheidsraad per brief gereageerd op het commentaar van Dr. Daniels van het NIOSH op het concept van het advies *Tricresylfosfaat*. De reactie staat hieronder, in dezelfde taal als het oorspronkelijke commentaar (Engels).

*On November 13th, 2023, the Health Council sent a letter to Dr. Daniels, Associate Director of Science, NIOSH/World Trade Center Health Program, in response to the comments on the draft report on Tricresylphosphate. The response is displayed below.*

Dear Dr. Daniels,

Thank you for accepting the invitation to comment on the draft report 'Tricresylphosphate' (TCP) that the Health Council published for public review in June 2023. I send you a response on your comments on behalf of the Council's Subcommittee on the Classification of Substances Toxic to Reproduction of the Dutch Expert Committee on Occupational Safety (DECOS).

The Subcommittee appreciates your thorough review of the report. You made several literature suggestions. The data described in the NTP study and the data published by Chapin et al. (1988) are identical. A reference to the NTP report is now added to section 2.2 of the DECOS report.

The other literature suggestions refer to pure tri-ortho-cresyl phosphate or TCP containing o-isomers. The presence of one or more o-tolyl groups among the three phenolic moieties of TCP can cause toxic effects. The interpretation of potential effects on development or reproduction by TCP can therefore be complicated by o-tolyl groups. For this reason, the presence of these o-isomers can complicate the evaluation of TCP for classification. According to the guidelines for classification (see section 1.2), a multi-constituent substance is classified as category Repro 1B if a constituent is already classified as category Repro 1B and is present at more than 0.3% in the substance. If a constituent is classified as category Repro 2, the limit is 3%. Given these guidelines and to avoid adversities caused by TOCP, the Committee considers only studies where TCP contains <0.3% TOCP in this advisory report for TCP. This explanation is included in section 2.2 of the DECOS report.