Comments on DECOS draft document on Tricresylphosphate By: Robert D. Daniels, Associate Director of Science NIOSH/World Trade Center Health Program Cincinnati, Ohio, USA

PAGE NUMBER, LINE NUMBER	COMMENT
General comment	The Committee's recommendations appear appropriate; however, a critical study was omitted from the review, which provides additional supporting evidence of fertility effects:
	Carlton BD, Basaran AH, Mezza LE, Smith MK [1987]. Examination of the reproductive effects of tricresyl phosphate administered to Long-Evans rats. Toxicology 46(3):321-328. <u>https://doi.org/10.1016/0300-483X(87)90212-5</u>
Specific comments	
Page 5, line 23	The statement is not correct. A cursory review of the literature revealed multiple animal studies that examined fertility effects from exposure to tricresyl phosphate. For example:
	Carlton BD, Basaran AH, Mezza LE, Smith MK [1987]. Examination of the reproductive effects of tricresyl phosphate administered to Long-Evans rats. Toxicology 46(3):321-328. <u>https://doi.org/10.1016/0300-483X(87)90212-5</u>
	Liu ML, Wang JL, Wei J, Xu LL, Yu M, Liu XM, Ruan WL, Chen JX [2015]. Tri-ortho-cresyl phosphate induces autophagy of rat spermatogonial stem cells. Reproduction 149(2):163-170. <u>https://doi.org/10.1530/REP-14- 0446</u>
	Wang J, Ruan W, Huang B, Shao S, Yang D, Liu M, Zeng L, Wei J, Chen J [2019]. Tri-ortho-cresyl phosphate induces autophagy of mouse ovarian granulosa cells. Reproduction 158(1):61-69. https://doi.org/10.1530/REP-18-0456
	There is also a National Toxicology Program (NTP) report on reproduction and fertility assessment in CD-1 mice administered tricresyl phosphate in feed that was not acknowledged [NTP 1985]. See <u>Tricresyl Phosphate: Reproduction</u> and Fertility Assessment in CD-1 Mice When Administered in the Feed. National Technical Reports Library - NTIS

Page 5, line 24	Contrary to the statement, more than one study
	examined developmental effects of TCP. For example, Carlton et al. [1987] reported
	significantly decreased postnatal viability for TCP
	exposure in rats.