

Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street
Sacramento, CA 95812

As organizations whose goals are to protect the health and safety of Californians and California workers, we support OEHHA's efforts to establish regulations regarding the listing of chemicals under Proposition 65 using the Labor Code listing mechanism. As OEHHA has stated, the regulations will provide clarity for California businesses and those who act in the public interest to enforce Proposition 65.

We believe that the regulatory language proposed by OEHHA is consistent with Proposition 65's statutory language and the relevant court decisions.

As this regulatory process moves forward we encourage OEHHA to consider that the landscape of regulatory toxicology is changing. Federal and international regulatory and toxicology agencies are adopting new testing methods, commonly called 21st Century Toxicology methods that take advantage of the increasing knowledge about genomic and cellular mechanisms of toxicity and also reduce reliance on older animal testing protocols. The same agencies are also increasingly taking advantage of current science that uses structure-activity relationships to predict endpoints like cancer and reproductive harm. We strongly encourage OEHHA to include language in these regulations that will allow OEHHA to make use of evaluations done by federal and international agencies that rely on this new science.

Sincerely,

Caroline Cox
Center for Environmental Health

Andria Ventura
Clean Water Action