



June 5, 2015

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010

Dear Ms. Barajas-Ochoa,

Lily of the Desert is providing here comments to OEHHA's April 23, 2015 announcement of the intent to list "*Aloe vera*, whole leaf extract" as a chemical known to the State to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) due to its identification by the International Agency for Research on Cancer (IARC) as "possibly carcinogenic to humans" (Group 2B).

Lily of the Desert conducts significant trade in *Aloe vera* (aloe vera) products sold in retail stores throughout the world including over 9,000 stores in the U.S. that are not covered by the proposed listing and respectfully requests that OEHHA modify the title of the material to be listed so as to reduce any potential confusion that may occur between the proposed chemical and our materials.

Our products are substantially different than the material identified by IARC that is the subject of the proposed listing. Lily of the Desert *Aloe vera* products are derived from the inner leaf and the entire leaf. They are purified by a process known as decolorization. This process removes the Aloin to a safe level of less than 1 ppm compared to the non-decolorized material studied by the National Toxicology Program that contained in excess of 10,000 ppm. I have enclosed a copy of the published study supporting our products.

In order to avoid confusion of what the proposed Proposition 65 listing covers and what it does not cover, Lily of the Desert respectfully requests that the title of the proposed material be modified to read "*Aloe vera*, non-decolorized whole leaf extract" with an appropriate description to clarify that this material is an unpurified ingredient. We feel that this would provide a significant and important point of difference in order for us to properly inform our customers, and it is consistent with how the material of concern has been variously identified, including by the National Toxicology Program in the two-year carcinogenicity study that is the basis for the IARC classification.

In summary, Lily of the Desert requests that the *aloe vera* material that is the subject of Proposition 65 be identified with the underlined term inserted to read "*Aloe vera*, non-decolorized whole leaf extract."

Sincerely,

A handwritten signature in black ink that reads "E. Don Lovelace".

E. Don Lovelace
President-CEO
Lily of the Desert
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