

From: [Anya Wolfenden](#)
To: [P65Public Comments](#)
Cc: pollyanya1@gmail.com; [Catherine Jex](#)
Subject: Aloe vera (whole leaf extract) and goldenseal root powder slated as possible for Prop 65
Date: Friday, May 15, 2015 8:08:23 AM
Importance: High

Dear Ms. Barajas-Ochoa:

In reference to the below, please do NOT add *Aloe vera* (whole leaf extract) and goldenseal root powder to your Prop 65 list. These two very helpful plants are indigenous herbal remedies that have been used for thousands of years in the United States and Central America.

It is an extremely poor “ministerial” error in judgment that would inhibit California’s citizens from gaining valuable access to health. We should not become a drug based country due to inaccurate warnings.

Sincerely,

Anya Wolfenden. M.A. Wellness Education, MsT, and someone who has successfully used both of the aforementioned plants for children and adults

Comments must be received no later than 5 p.m. on Tuesday, May 26. Comments can be emailed to P65Public.Comments@oehha.ca.gov, faxed to (916) 323-2265 or mailed to the following address:

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

Sacramento, CA—The Office of Environmental Health Hazard Assessment (OEHHA) in California is looking to add *Aloe vera* (whole leaf extract) and goldenseal root powder to the Safe Drinking Water and Toxic Environment Act of 1986 (Proposition 65), claiming they are “known to the state to cause cancer.”

The International Agency for Research on Cancer (IARC) published a list called “Agents classified by the IARC Monographs, Volumes 1-112.” This document placed *Aloe vera* (the liquid portion, which it says is not the same as Aloe vera decolorized whole leaf extract, Aloe vera gel or latex) and goldenseal root powder in Group 2B, meaning it is “possibly carcinogenic to

humans." Any substance, according to Proposition 65, must have a label that says that it is known to cause cancer.

The American Herbal Products Association (AHPA) does not agree with the classifications of *Aloe vera* and goldenseal root powder as carcinogenic. "IARC's classification of these two herbal ingredients relied on uncritical reviews of research conducted by the National Toxicology Program wherein laboratory animals were fed extremely large doses on a daily basis for almost their entire lifetimes," said Michael McGuffin, president of the AHPA, in a press release.

"And although the OEHHA has stated that it does not believe it has any obligation to consider any additional scientific information," McGuffin added, "AHPA will submit comments to call attention to the flaws in this so-called ministerial process."

The OEHHA is giving the public an opportunity to comment as to whether or not the IARC has "identified the specific chemical or substance as a known or potential human or animal carcinogen," according to the OEHHA.

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