

**PCBs MADL/NSRL**

Harry Rice [harry@goedomega3.com]

**Sent:** Monday, May 21, 2012 9:42 AM**To:** P65Public Comments**Cc:** Harry Rice [harry@goedomega3.com]**Attachments:** 21May2012GOEDLetterToOEHHA~1.pdf (96 KB)

Dear Ms. Vela:

On behalf of the Global Organization for EPA and DHA Omega-3s (GOED), I hereby submit the attached comments on the proposed regulatory amendments updating the NSRL and adopting a MADL for polychlorinated biphenyls (PCBs) under Proposition 65 in Title 27, California Code of Regulations.

Thank you.

Best regards,

Harry

Harry B. Rice, Ph.D.

V.P., Regulatory &amp; Scientific Affairs

Global Organization for EPA and DHA Omega-3s (GOED)

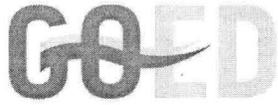
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GLOBAL ORGANIZATION FOR EPA AND DHA OMEGA-3S

May 21, 2012

Ms. Monet Vela  
Office of Environmental Health Hazard Assessment  
P.O. Box 4010, MS-25B  
1001 I Street  
Sacramento, California 95814

RE: Notice of Proposed Rulemaking (April 13, 2012) – Polychlorinated Biphenyls (PCBs)

Dear Ms. Vela:

The Global Organization for EPA and DHA Omega-3s (GOED) is an international trade association that works with regulators and scientific groups to ensure consumers have access to high quality EPA and DHA products, not to mention accurate information about these valuable nutrients. Thus said, GOED appreciates the opportunity to provide comments on the proposed regulatory amendments updating the NSRL and adopting a MADL for polychlorinated biphenyls (PCBs) under Proposition 65 in Title 27, California Code of Regulations.

As mentioned in the Initial Statement of Reasons associated with the Notice of Proposed Rulemaking for PCBs, there are 209 PCB congeners. It is GOED's understanding that PCB analysis for any food chain exposure should be for the sum of all 209 PCB congeners and not just a subset of the six or seven congeners which is common industry practice in many parts of the world. Thus said, GOED recommends clarifying the number of PCB congeners represented by the proposed updated NSRL as well as the proposed MADL. Furthermore, assuming the proposed levels are adopted, GOED recommends clarifying the number of PCB congeners in the next printing of "PROPOSITION 65 SAFE HARBOR LEVELS: No Significant Risk Levels for Carcinogens and Maximum Allowable Dose Levels for Chemicals Causing Reproductive Toxicity."

Thank you again for allowing GOED the opportunity to provide feedback on the Notice of Proposed Rulemaking. If you have any questions or require further clarification, please do not hesitate to contact either one of us.

Sincerely,

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Executive Director  
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Vice-President of Regulatory & Scientific Affairs  
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