



November 18, 2013

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

Re: HID – DINP

The California Manufacturers and Technology Association represents 600 manufacturing, processing and technology based companies that are located in the state of California. Our industry is responsible for over \$200 billion in annual revenue in the State and employs more than 2 million Californians.

We are submitting the following comments in regards to the proposed listing of Diisononyl Phthalate (DINP) to California's Proposition 65 list.

As a representative of manufacturers across the state, we are very concerned with the implications that the listing of DINP will have on our industry. DINP has been safely used in products for decades with no known carcinogenic effects to humans. We believe the Hazard Identification Document (HID) on DINP has several errors that must be properly addressed.

First, the data used to support the listing of DINP as a carcinogen is far from inclusive. There is a wide-body of science that supports the safety of DINP and that it does not cause carcinogenic effects in humans. We believe that a listing based on science that is outdated and inconclusive is both irrational and unnecessary.

Second, listing DINP under Proposition 65 as a carcinogen would be severely misguided as there is sufficient evidence to prove otherwise. The safety of Californians should be the primary concern for the Carcinogen Identification Committee (CIC). If DINP is removed from the marketplace, manufacturers will be forced to turn to alternatives that are less tested and whose effects have not been properly examined.

Finally, in June 2001, a Chronic Hazard Advisory Panel (CHAP) that was convened by the Consumer Product Safety Commission (CPSC) affirmed that DINP is not known to be a carcinogen in humans. The CHAP concluded that "humans do not currently receive DINP doses from DINP-containing consumer products that are plausibly associated with a significant increase in cancer risk."

The California Manufacturers and Technology Association strongly believes that the case for not listing DINP as a carcinogenic chemical based on scientific data is robust and should be closely examined. A listing of DINP will not only harm consumers but also the competitiveness of our state's manufacturing industry. We urge the CIC to examine the full-body of science available and vote "no" on the listing of DINP.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Rogge".

Michael J. Rogge
Policy Director, Environmental Quality