

Vela, Monet@OEHHA

To: Vela, Monet@OEHHA
Subject: FW: BPA Warnings

From: Jason Pfeifle [<mailto:jpfeifle@calpirg.org>]
Sent: Thursday, September 22, 2016 9:57 AM
To: P65Public Comments <P65Public.Comments@oehha.ca.gov>
Subject: BPA Warnings

Dear OEHHA staff,

I am writing on behalf of CALPIRG to ask you to not extend OEHHA's emergency regulations related to Bisphenol A (BPA) and to require product-specific BPA warnings that provide all consumers with the information they need to protect themselves from exposure to this reproductive toxicant.

We are concerned with the Office of Environmental Health Hazard Assessment's (OEHHA) emergency action to amend Section 25603.3 Title 27, California Code of Regulations warnings for exposures to Bisphenol A (BPA) – a known reproductive toxicant – from canned and bottled food and beverages. This "emergency" action undermines consumers' right to know about chemical exposures, and makes it more difficult for consumers to protect themselves from toxic BPA exposure.

Canned food and beverage manufacturers have already had over a year to remove harmful BPA epoxy linings from their products. Extending emergency regulations would further delay that transition, thereby leaving more consumers at risk for BPA exposure.

We also believe that the new proposal for non-emergency regulation has some of the same flaws. These proposed warnings won't provide consumers with the information they need when it's most important. To make informed decisions, consumers need BPA warnings labeled on specific food items prior to the point of purchase. A general sign indicating that some canned food products contain BPA will not provide consumers with the information they need, and simply listing a website with a database of product-specific BPA warnings makes that information far more difficult to access than it should be.

Finally, we believe that the use of non-specific BPA warnings undermines the underlying purpose of Proposition 65. General warnings in commercial retail outlets are not effective. In these cases, the message about the risk of toxic exposure often gets lost and the public can be desensitized to real potential harm from chemical hazards. Furthermore, vague warnings contribute to ongoing criticisms of the statute itself, thereby weakening the underpinnings of the law.

We respectfully urge you to not extend the "emergency" regulation and to take immediate action to provide consumers with the product specific warnings they need to protect their health and the health of their families.

Sincerely,
Jason Pfeifle, PhD
Public Health Advocate

CALPIRG and CALPIRG Education Fund
(c): 626-221-4925
(o): 510-844-6809
jpfeifle@calpirg.org