



January 25th, 2016

Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
Sacramento, California 95814
monet.vela@oehha.ca.gov

Dear Ms Vela:

The undersigned organizations thank you for the opportunity to comment on the proposed changes to Article 6 in Title 27 of the California Code of Regulations. We support efforts to make Proposition 65 warnings more useful and more informative.

We would like to support four specific issues in the proposed changes:

- 1) We support use of the "exclamation mark/triangle" symbol to identify safe harbor warning statements. As demonstrated by the results of the recent survey conducted by UC Davis, this helps consumers locate and understand the warning.
- 2) We support including at least one chemical name in the proposed safe harbor warning language. This information will make the warnings more informative, and help consumers and other exposed people reduce their aggregate exposure to a particular chemical.
- 3) We support the use, as described in the proposed regulations, of additional languages for safe harbor warnings. As the number of Californians increases who are multilingual or not native English speakers, this concept becomes more and more important.
- 4) We support restrictions on the amount of supplemental text in safe harbor warnings which often have the effect of diluting or minimizing the warning language.

We would also like to raise three concerns with the proposal.

Asian and Pacific Islander Obesity Prevention Alliance * Bayview Hunters Point Community Advocates * Black Women for Wellness * Breast Cancer Action * Breast Cancer Fund * California Healthy Nail Salon Collaborative * California Latinas for Reproductive Justice * California Pan-Ethnic Health Network * Californians Against Waste * Californians for Pesticide Reform * Center for Environmental Health * Center for Race, Poverty and Environment * Clean Water Action * Coalition for Clean Air * Commonwealth * Communication Workers of America - District 9 * Communities for a Better Environment * East Yard Communities for Environmental Justice * Environment California * Environmental Working Group * Forward Together (formerly Asian Communities for Reproductive Justice) * Green Schools Initiative * Green Science Policy Institute * Healthy 880 Communities * Healthy Child, Healthy World * Healthy Children Organizing Project * Instituto de Educación Popular del Sur de California * Just Transition Alliance * Making Our Milk Safe (MOMS) * Movement Strategy Center * Pesticide Action Network North America * Physicians for Social Responsibility - Los Angeles * Science and Environmental Health Network * Silicon Valley Toxics Coalition * United Steel Workers - Local 675 * Worksafe

Contact: Kathryn Alcántar, CHANGE Campaign Director - changecalifornia@gmail.com or 510.655.3900 x315

www.changecalifornia.org

1) Warnings must be provided prior to purchase. Safe harbor warnings on receipts, or on products that are purchased online are difficult for consumers. Receiving a warning at those points requires the consumer to go through a return process in order to avoid exposure, which is time-consuming and expensive for businesses and consumers alike.

2) While manufacturers and distributors should bear the primary responsibility for providing warnings when appropriate, retailers must take a fair share of the responsibility, especially in today's global economy when manufacturers may be distant.

3) Product manuals are not an appropriate location for safe harbor warnings. Most manuals are not available to consumers until after purchase, so the warnings would present the same issues as warnings on receipts. In addition, many consumers do not read manuals, especially the sections that contain multiple warnings.

Sincerely,

Kathryn Alcantar
CHANGE

Bill Magavern
Coalition for Clean Air

Sarada Tangirala
Women's Voices for the Earth

Andria Ventura
Clean Water Action

Paul Towers
Pesticide Action Network North America

Jeanne Rizzo
Breast Cancer Fund

Bill Allayaud
Environmental Working Group

Robert Gould
PSR SF Bay Area Chapter

Catherine Porter
California Healthy Nail Salon Collaborative