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Monet Vela
Office of Environmental Health Hazard Assessment
P. O. Box 4010
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RE: PROPOSED RULEMAKING AND ANNOUNCEMENT OF PUBLIC HEARING TITLE 27,
CALIFORNIA CODE OF REGULATIONS PROPOSED REPEAL OF ARTICLE 6 AND ADOPTION OF NEW
ARTICLE 6 - CLEAR AND REASONABLE WARNINGS

Claigan Environmental Inc. (Claigan) is leader in practical solutions for global restricted materials compliance. Claigan has conducted California Proposition 65 risk assessments on hundreds of consumer and professional products.

Regarding the new proposed rule making regarding clear and reasonable warnings, we have a number of questions -

1. Does placing a warning label on the product packaging constitute 'on-product' labelling?
2. For complex products where the user should read the manual to operate the product safely, can the warning be placed in the product manual?
3. Does consumer product exposure extend to patients undergoing medical or dental procedures?
4. What type of exposure are students studying at a school or college? If they are exposed by a professional product during training for their profession, is that an occupational exposure even though they are not an employee of the school or college?
5. What warnings are required for sellers that sell directly to private households in California without the use of the internet or a retailer? In these cases, communication may be by phone and the user will not see any warnings on the product until the product has already been purchased and delivered.
6. For occupational exposure, is a proposition 65 warning required in section 15 of the GHS safety data sheet (the current practice) or is only standard compliance to GHS required (with no specific mention of California Proposition 65)?
7. When identifying a specific chemical in a warning, to what specificity does a manufacturer have to name the chemical? For the example of diisononyl phthalate (DINP), is the specific name diisononyl phthalate required to be included in the warning or is a manufacturer allowed to use general names for the substance such as DINP or 'phthalates'?

Thank you for your time,



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