



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes  
Automotive Care - Antimicrobial - Pest Management

June 23, 2014

Via Email - [P65Public.Comments@oehha.ca.gov](mailto:P65Public.Comments@oehha.ca.gov)

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

RE: Notice of Intent to List Ethylene Glycol

Dear Ms. Oshita:

The Consumer Specialty Products Association<sup>1</sup> (CSPA) appreciates the opportunity to comment on the Notice of Intent to List Ethylene Glycol. Among CSPA's members are companies who have an interest in the manufacture of consumer products containing ethylene glycol. CSPA supports comments submitted by the American Chemistry Council which conclude that:

Since the 2004 NTP-CERHR report, which is the authoritative body report identified by OEHHA, eleven different studies have been published. These scientifically valid data were not available to NTP-CERHR and clearly establish that the sufficiency-of-evidence criteria for EG are not met for adverse developmental toxicity in humans because it is not biologically plausible for non-lethal doses. In addition, Environment Canada, under regulation CEPA 1999 in a 2014 report, gives supporting evidence that EG exposures are of negligible concern for human developmental toxicity. EG should not be included on the list of chemicals known to the State to cause reproductive toxicity (developmental endpoint) under Proposition 65.

It is important to note industry has taken action voluntarily to reduce the possibility of ingestion of certain products containing ethylene glycol. It is widely recognized that antifreeze and engine coolant are acutely poisonous when ingested in significant quantities and can pose a danger to pets, wild life and children attracted to it because of its sweet taste. Working with its member

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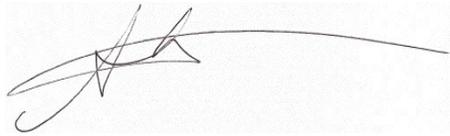
<sup>1</sup> The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$100 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; candles, and fragrances and air fresheners that eliminate odors; pest management products for home, garden and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care<sup>®</sup>, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products.

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companies, CSPA joined with the Humane Society of the United States (HSUS) in a multi-state effort to enact legislation that calls for adding a bitter-flavored agent to deter ingestion. Today, all major marketers are adding a bitterant in antifreeze in all 50 states. CSPA received the 2012 Henry Spira Humane Corporate Progress Award<sup>2</sup> from the HSUS. The HSUS recognized CSPA for its work to make antifreeze and engine coolant containing ethylene glycol unpalatable to animals and humans. The award is given to acknowledge corporations that take special steps to safeguard animals.

As noted above, a number of different studies have been published since the authoritative body report identified by OEHHA was published. In many cases, these scientifically valid data were developed based upon recommendations from the 2004 NTP-CERHR report and should be considered. These studies clearly establish that the sufficiency-of-evidence criteria for Ethylene Glycol are not met for adverse developmental toxicity in humans because it is not biologically plausible for non-lethal doses. Therefore, CSPA recommends OEHHA withdraw the Notice of Intent to List Ethylene Glycol.

Sincerely,



Steven D. Bennett, Ph.D.  
Senior Director, Scientific Affairs and Sustainability



Kristin Power  
Vice President, State Affairs

cc: CSPA Scientific Affairs Committee Proposition 65 Task Force  
CSPA Industrial and Automotive Products Division  
Automotive Specialty Products Alliance  
Laurie Nelson, Randlett Nelson Madden

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<sup>2</sup> [http://www.humanesociety.org/news/press\\_releases/2013/05/consumer-specialty-products-association-henry-spira-awards-050213.html](http://www.humanesociety.org/news/press_releases/2013/05/consumer-specialty-products-association-henry-spira-awards-050213.html)