

**Martin E. Bernstein , Ph.D.**  
**7 Eastdale Road**  
**White Plains, New York 10605**  
**(914) 428-6659 (phone and fax)**  
[toxrac@aol.com](mailto:toxrac@aol.com)

Cynthia Oshita  
OEHHA  
Sacramento, CA 95812-4010

May 5, 2009

Re: Chemical Prioritization - Triclosan

Dear Ms. Oshita:

Triclosan was selected through the OEHHA process for consideration by the CIC with respect to providing advice on prioritization for possible preparation of hazard identification materials.

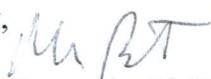
The compilation of available information utilized the recent EPA RED document on triclosan (USEPA, 2008) as a comprehensive source. This document indicates that sufficient toxicology information is available to satisfy re-registration requirements. No additional carcinogenicity (superceding the letter from J. Housenger to A. Hirsch dated July 1, 2008) or reproductive toxicity data are either required or requested. Triclosan, based on the available data, was not considered to present a carcinogenic (complementing the FDA assessment) or reproductive risk.

For your information, additional comprehensive reviews of triclosan were conducted by NICNAS - Australia (October, 2008) and the EC SCCP (February, 2009). Their conclusions were similar to EPA and FDA - the existing triclosan evidence did not demonstrate a carcinogenic or reproductive risk.

In addition, any structural similarity to PCBs and PBDEs are not scientifically relevant since these classes are highly halogenated compared to triclosan. California scientists have previously reached a similar conclusion with respect to the "dioxin" family, namely that di and tri-chlorinated dioxins were toxicologically insignificant compared to their more highly chlorinated analogs.

Based on this information, triclosan should not be given any priority for subsequent hazard identification and removed from consideration as a potential carcinogenic/reproductive risk under the Prop 65 mandate.

Thank you for the opportunity to provide input into this process.

Sincerely,  
  
Martin E. Bernstein, Ph.D.