

April 29, 2015



Ms. Monet Vela
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010
Sent Via Email to: P65Public.Comments@oehha.ca.gov

RE: Notice of Intent to List: Styrene

Dear Ms. Vela,

The California Grocers Association appreciates the opportunity to comment on the Notice of Intent to List styrene under the Safe Drinking Water and Toxic Enforcement Act of 1986. We believe based on the comments provided by the Styrene Information Research Center (SIRC) on March 26, 2015 to OEHHA that the NTP listing does not satisfy the sufficiency of evidence criteria to support an authoritative bodies listing and OEHHA should withdraw its Notice of Intent to List styrene.

California Grocers Association is a non-profit, statewide trade association representing the food industry since 1898. CGA represents approximately 500 retail members operating over 6,000 food stores in California and Nevada, and approximately 300 grocery supplier companies. Traditional supermarkets in California employ more than 300,000 residents in virtually every community in the State.

We understand OEHHA was obligated to consider an authoritative bodies listing for styrene based on a settlement agreement involving a number of chemicals. Based on the scientific record confronting OEHHA today, which has been outlined in the comments provided by SIRC, we believe there is no basis for listing styrene under the authoritative bodies' mechanism.

It is important to recognize that several leading federal regulatory agencies have stated that polystyrene is safe for use in contact with food. Primarily, the US Food and Drug Administration which regulates all food packaging has determined that polystyrene is safe for use in contact with food. They are joined by leading staff from the US National Toxicology Program who has made public statements that any risk from polystyrene is not worth concern and the US National Institutes of Environmental Health Sciences which has stated that people are not at risk from using polystyrene products.

Thank you for the opportunity to comment and CGA respectfully requests OEHHA withdraw its Notice of Intent to List styrene.

Sincerely,

Timothy James
Sr. Manager, Local Government Relations and Regulatory Affairs