

From: Teresa Bui <teresabui@cawrecycles.org>
To: <fkammerer@oehha.ca.gov>
Date: 9/13/2010 3:50 PM
Subject: Comment on Pre-Regulatory Draft for Green Chemistry Hazard Traits

Dear Ms. Kammerer:

Thanks for giving us the opportunity to comment on Pre-Regulatory Draft for Green Chemistry Hazard Traits.

Our comments are as followed:

* On page 2, for the Definition of Authoritative Organization, we suggest amending it to read: "Organizations that satisfy the definition of "Authoritative organization", are the following including but not limited to:" in order to not exclude any new authoritative body that may form or recognized in the future.

* On page 17, under (c) Exposure Potential Hazard Traits, we suggest adding "Time of Exposure" because that has an effect on how much impact the chemical will have on the individual/environment.

* We suggest adding a category for "antibacterial resistance", either under (c) Exposure Potential Hazard Traits ii. Bioaccumulation, or viii. Persistence in Biota. While Triclosan, a commonly used ingredient in consumer products, have not been labeled as a health concern by the FDA it is important to take into consideration the potential for triclosan and other similar chemicals to help build resistant strains of bacteria.

I look forward to working with you in drafting the regulations.

Sincerely,

Teresa Bui

Policy Associate

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