



November 4, 2019

Mr. Julian Leichty
Office of Environmental Health Hazard Assessment
Proposition 65 Implementation Program
PO Box 4010, MS-12B
Sacramento, CA 95812

Via electronic submission

Re: Availability of Hazard Identification Materials for Acetaminophen

Dear Mr. Leichty:

The California Dental Association, representing 27,000 member dentists across the state, writes to express our concern regarding the review of acetaminophen currently being undertaken by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHAA). CDA is concerned that a decision to list acetaminophen under Proposition 65 will cause consumer confusion and could negatively impact compliance with dental pain management regimens.

Critical evaluation of the studies compiled in the OEH report shows problems with data imprecision, inconsistent results and limitations due to study design. Taken together, there simply is not compelling evidence to conclude there is an increased risk of cancer due to use of acetaminophen. This should be sufficient to exclude acetaminophen from being added to Proposition 65 list of carcinogens. In addition, we would like to argue that cancer is not the only concern with respect to the well-being of people.

According to the Centers for Medicare and Medicaid Services, more than 115 people died every day in 2016 from opioids and 40% of those overdose deaths involved a prescription opioid. The Substance Abuse and Mental Health Services Administration estimates that 2.1 million Americans suffer an opioid abuse disorder. The increase in opioid-related deaths as well as the high number of opioid prescriptions written by prescribers, including dentists, has been a call to action that has reshaped acute pain management by both dentists and physicians. Acetaminophen, which has a strong and safe track record for managing moderate pain, is an essential tool for these health professionals.

In order to optimize patient care, the American Dental Association, the California Dental Association and the Dental Board of California have issued policy statements prioritizing

pain management education and adherence to best practices in dentistry. This includes reducing opioid misuse and abuse subsequent to “first exposure” of the drug from dentist office prescriptions.¹

Research shows that acetaminophen can serve as an equivalent and sometimes superior alternative to opioids in the management of musculoskeletal pain.² The use of acetaminophen has a lower incidence of side effects including the potential for addiction and abuse.³

A decision to list acetaminophen under Proposition 65 will cause consumer confusion and could negatively impact patient compliance with non-opioid pain management regimens and even result in an increase in preference to opioid medication.

As the committee proceeds with its review of acetaminophen, we request that serious consideration be given to the long-standing overall safety profile of this medicine and the increasingly important value to consumers for acute pain management.

Sincerely,

A handwritten signature in black ink that reads "Mary McCune". The signature is written in a cursive, slightly slanted style.

Mary McCune
Legislative & Regulatory Advocate

Cc: Ms. Christine Hironaka, Deputy Cabinet Secretary, Office of the Governor

¹ Schroeder AR, et al. Association of Opioid Prescriptions from Dental Clinicians for US Adolescents and Young Adults with Subsequent Opioid Use and Abuse. *JAMA Intern Med* Dec. 3, 2018.

² Ibid.

³ Moore PA, et al. Combining ibuprofen and acetaminophen for acute pain management after third-molar extractions: translating clinical research to dental practice. *J Am Dent Assoc* August 2013 Aug;144(8):898–908.