

January 31, 2020

Mr. Julian Leichty
Office of Environmental Health Hazard Assessment
Proposition 65 Implementation Program
PO Box 4010, MS12B
Sacramento, CA 95812

Re: Potential listing by the CIC of acetaminophen as a carcinogen under Proposition 65

Dear Mr. Leichty:

On behalf of our more than 48,000 physician and medical student members, the California Medical Association (“CMA”) would like to thank you for considering comments on the review of acetaminophen currently being undertaken by the California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment (OEHHA). Having reviewed information about acetaminophen and understanding the important role this drug plays in patient care, we are concerned about the potential listing by the CIC of acetaminophen as a carcinogen under Proposition 65.

Many types of medications can be used to alleviate pain, some that act directly on pain signals or receptors, and others that contribute indirectly to either reduce pain or improve function. For patients with persistent pain, medications may be used concurrently in an effort to target various aspects of the pain experience.

Acetaminophen is widely and effectively used in both prescription and over-the-counter (OTC) products to reduce pain and fever. It is one of the most commonly-used drugs in the United States and is categorized as a non-opioid pain reliever. It is used in the management of both acute and chronic pain such as that arising from injury, arthritis, dental procedures, swelling or surgical procedures. Although they are weaker analgesics than opioids, acetaminophen does not produce tolerance, physical dependence or addiction.

The majority of studies have not found an association between acetaminophen and cancer. We have significant concerns that listing acetaminophen under Proposition 65 will confuse patients and reduce the use of an important clinical option for pain relief. As California continues to focus on ensuring appropriate clinical prescribing practices, it is critical to ensure that patients have accurate information about their pain management options.

Thank you for the opportunity to provide comments regarding the potential listing by the CIC of acetaminophen as a carcinogen under Proposition 65. We appreciate your consideration of our input on this issue. As the committee proceeds with its review of acetaminophen, we request that consideration be given to the overall safety profile of this medicine and the role it plays in providing high quality patient care. We look forward to working with OEHHA and other stakeholders to ensure it achieves its objectives. Please contact Yvonne Choong at (916) 551-2884 or by email at ychoong@cmadocs.org should you require any clarification or additional information regarding CMA's comments.

Sincerely,

A handwritten signature in cursive script that reads "Yvonne Choong". The signature is written in a dark ink and is positioned above the typed name and title.

Yvonne Choong
Vice President, Health Policy
California Medical Association

