March 27, 2021

Ms. Monet Vela Office of Environmental Health Hazard Assessment 1001 I Street, 23rd Floor Sacramento, CA 95812-4010

Dear Ms. Vela:

As leaders, innovators and manufacturers in America, we are committed to protecting human health and the environment, social well-being and the economic performance of the employees, communities, customers and consumers we serve. Every member of the value chain is committed to ensuring that chemicals and other products are developed, manufactured, distributed and used safely. To accomplish these goals and ensure that the supply chain is not disrupted at this critical time, the Office of Environmental Health Hazard Assessment should withdraw the misguided proposal to amend Proposition 65 short-form warning requirements.

Environmental laws and regulations should be designed with utmost care to ensure that they are effective and lift up communities. The proposed amendments would do the opposite, causing public confusion, harming innovation and competitiveness in a global market. At a time when the distribution of goods and lifesaving supplies is more important than ever before, we cannot afford to jeopardize interstate commerce, disrupt manufacturing and irrevocably impact the supply chain nationwide.

To avoid a state by state "patchwork" approach to labeling, we need a coordinated effort to establish consistent national standards that enhance protection of the public and the environment, promote investment and innovation, avoid duplication, public confusion and unnecessary negative economic impacts. Unfortunately, the proposal does the opposite.

When it comes to our workforce and the people we serve, no goal is more important than safety. We remain dedicated to protecting the people and the planet because communities thrive when they are connected to each other and can build a bright future together. To accomplish these goals and ensure that the supply chain is not disrupted at this critical time, the proposed rulemaking amending the short-form warning requirements under Proposition 65 should be withdrawn.

Sincerely,

The Adhesive and Sealant Council AICC, The Independent Packaging Association Air-Conditioning, Heating & Refrigeration Institute (AHRI) Albaugh, LLC Alfa Tools The Aluminum Association American Apparel & Footwear Association American Coatings Association American Forest & Paper Association American Frozen Food Institute American Home Furnishings Alliance

- American Mold Builders Association
- American Pet Products Association
- American Sportfishing Association
- American Wire Producers Association
- American Wood Council
- Appalachian Hardwood Manufacturers, Inc.
- Arkansas State Chamber/Associated Industries of Arkansas
- The Association for Hose and Accessories Distribution (NAHAD)
- Associated Industries of Missouri
- Associated Pacific Machine Corp.
- Association of Equipment Manufacturers
- Association of Home Appliance Manufacturers
- Auto Care Association
- Banner Engineering
- Bergstrom Inc.
- **Birmingham Fastener**
- Bobrick Washroom Equipment, Inc.
- Brick Industry Association
- **Brunswick Corporation**
- Brush Research Manufacturing Company Inc
- The Business Council of New York State, Inc.
- Business & Industry Association of New Hampshire
- Business + Institutional Furniture Manufacturers Association
- California Automatic Vending Association
- California Manufacturers & Technology Association
- California Pool & Spa Association
- Can Manufacturers Institute
- Continental Refrigerator
- Core Molding Technologies
- Coturnix, LLC
- Council of Industry of Southeastern New York
- Dyna-Mix Inc.
- Ecological Fibers Inc.
- Electronic Components Industry Association (ECIA)
- Electronic Theatre Controls, Inc.
- Fabricators and Manufacturers Association, International
- Fender Musical Instruments Corporation
- Ferro Industries, Inc.
- Flexible Packaging Association
- Formula Boats
- Frozen Potato Products Institute
- GE Appliances, a Haier company
- Georgia Association of Manufacturers

Gerdau The Gill Corporation Gilster-Mary Lee Corp. Global Metal Finishing, Inc. Goizper Spraying NA, Inc. Gordon Brush Mfg. Co. Inc. Hearth, Patio & Barbecue Association Hilti, Inc. The Household & Commercial Products Association (HCPA) Illinois Manufacturers' Association INDA, The Association of the Nonwoven Fabrics Industry Independent Lubricant Manufacturers Association The Industrial Brush Company Inc. Industrial Fasteners Institute Industrial Minerals Association - North America International Association of Plastics Distribution International Sleep Products Association International Wood Products Association Iowa Association of Business and Industry Irrigation Association ISSA - The Worldwide Cleaning Industry Association Jaz Brush USA, Inc. JAZ USA Inc. Kansas Chamber KD Manufacturing, Inc. Kelly-Moore Paint Co., Inc. **KEMET Electronics Corporation** Kentucky Association Of Manufacturers Kitchen Cabinet Manufacturers Association Koki Holdings America Komatsu America Corp. LBS Leviton Manufacturing Co., Inc. Loos & Co Maine State Chamber of Commerce Makita U.S.A., Inc. The Malish Corporation Manufacturers Alliance for Productivity and Innovation (MAPI) Maryland Chamber of Commerce Maverick Abrasives McNaughton & Gunn, Inc. Metabo Corporation Metal Powder Industries Federation

MGK Michigan Manufacturers Association Mohawk Industries, Inc. Monahan Partners, Inc. Montana Chamber of Commerce Motor & Equipment Manufacturers Association National Association of Chemical Distributors National Association of Manufacturers National Association of Printing Ink Manufacturers (NAPIM) National Automatic Merchandising Association National Electrical Manufacturers Association (NEMA) National Fastener Distributors Association National Marine Manufacturers Association National Oilseed Processors Association National Shooting Sports Foundation National Stone Sand and Gravel Association National Tooling & Machining Association National Waste & Recycling Association Nevada Manufacturers Association New Jersey Business and Industry Association New Mexico Business Coalition Next Generation Manufacturing Non-Ferrous Founders' Society North American Association of Food Equipment Manufacturers (NAFEM) North American Die Casting Association North American Meat Institute North American Millers' Association Northeast Pennsylvania Manufacturers & Employers Association Ohio Manufacturers' Association Osborn Otis Technology **Outdoor Power Equipment Institute** Pennsylvania Manufacturers' Association PFERD Inc. Phoenix Closures Pioneer Packaging Inc. Plastic Pipe and Fittings Association **Plastics Industry Association** Plumbing Manufacturers International Plymouth Products Acquisition, Inc. Pool & Hot Tub Alliance

Power Tool Institute

Precision Machined Products Association Precision Metalforming Association **PRINTING United Alliance Resilient Floor Covering Institute** Rhode Island Manufacturers Association **Rinnai America Corporation Robert Bosch Tool Corporation RV Industry Association** San Antonio Manufacturers Association Shark Industries Ltd. The Shyft Group USA, Inc. SigmaTron International, Inc. SNAC International Society of Glass and Ceramic Decorated Products Specialty Equipment Market Association Specialty Tools & Fasteners Distributors Association (STAFDA) Spiral Brushes Inc. Spring Manufacturers Institute Stanley Black & Decker Starcke Abrasives USA, Inc. Steel Manufacturers Association Stockmeier Urethanes USA, Inc. Stromberg Allen and Company Strongwell Sugar Creek Packing Co. The Sulphur Institute Sullair, LLC Systems Technology, Inc. **TANIS** Incorporated The Technology and Manufacturing Association Techtronic Industries Power Equipment Texas Association of Manufacturers Thermo Fisher Scientific TRSA, the Association for Linen, Uniform and Facility Services Unicorr Packaging Group United Veterinary Services Association Utah Manufacturers Association Valley Industrial Association Valvoline Vinyl Institute Virginia Manufacturers Association Weiler Abrasives Wisconsin Manufacturers & Commerce

The Wooster Brush Company Zero Zone Inc.