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Sent Electronically to: <https://oehha.ca.gov/comments>

Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
P. O. Box 4010
Sacramento, California 95812-4010

**RE: Article 6 Clear and Reasonable Warnings Amendments Related to
Short-Form Warnings for Consumer Product Exposures**

Dear Ms. Vela,

My company is part of the business community that recently spent significant resources to correctly implement the Proposition 65 (Prop 65) changes instituted in 2018. Consequently, we have significant concerns with the California Office of Environmental Health Hazard's (OEHHA) proposed regulations for the Prop 65 amendments related to the short-form warnings.¹ We urge OEHHA to withdraw the proposed Prop 65 short-form warning amendments.

As a manufacturer in the U.S., we are committed to protecting the environment and the health of our workforce, communities, and customers we serve. No goal is paramount to safety. Our large and complex manufacturing value chain is committed to ensuring that the chemicals and products we develop, manufacture, and distribute are used in an appropriate fashion.

Furthermore, OEHHA's proposed amendments to the short-form warnings are inappropriately timed as significant resources have already been utilized to implement Prop 65 changes from two years ago. These proposed amendments will have a significant adverse economic impact on businesses resulting from the relabeling and repackaging requirements. We are also concerned that the proposed provisions, instead of helping, could cause confusion and impact the readability of labels due to an increased amount of text on the packaging. The proposed changes would add minimal incremental gain for California consumers. Based on these concerns, we urge OEHHA to withdraw the proposed amendments related to the Prop 65 short-form warnings.

If OEHHA moves forward with the proposed amendments, we urge OEHHA, at a minimum, to provide a reasonable transition period. We believe a five-year transition period is appropriate. OEHHA's proposed one-year transition is unworkable for businesses to evaluate and relabel all of their Prop 65 short-form warnings and published materials. Further, many businesses are facing incredibly economically-challenging times with increased labor, work force and other regulatory complexities created by the COVID-19 pandemic. Businesses need to have confidence that the regulations they invest significant resources in remain consistent and sensible. Having a longer transitional period would help with the compliance costs.

Thank you for considering the recommendations presented in these comments.

Sincerely,
Eliza Crowther
Associate Counsel