



April 20, 2022

Ms. Monet Vela
Office of Environmental Health
Hazard Assessment
1001 I Street, 23rd Floor
Sacramento, CA 95814

RE: NAIMA's Support for OEHHA's Final Changes to Its Proposed Rulemaking:
Amendments to Article 6, Clear and Reasonable Warnings – Short Form

Dear Ms. Vela:

The North American Insulation Manufacturers Association (“NAIMA”) appreciates the opportunity to submit comments on California’s Office of Environmental Health Hazard Assessment’s (“OEHHA”) Notice of Proposed Rulemaking: Amendments to Article 6, Clear and Reasonable Warnings – Short Form. In this notice, OEHHA has responded to public comments and restored the original language that protects use of the short form.

NAIMA is the trade association for manufacturers of fiber glass, rock and slag wool insulation products. NAIMA promotes energy efficiency and pollution reduction through energy savings achieved through the use of thermal insulation products. NAIMA’s members have four fiber glass manufacturing plants in the State of California. Some of the products manufactured by several of NAIMA’s members are subject to the requirements of Prop. 65. Therefore, there is direct and very relevant interest in OEHHA’s proposed amendments.

OEHHA’s Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, requires businesses with 10 or more employees to provide a clear and reasonable warning before exposing individuals in California to any listed chemical that may cause cancer or reproductive harm.

When OEHHA’s revisions to the warning requirement were issued in 2016 (and in full effect in August of 2018), OEHHA included a short-form warning option as an acceptable alternative to the revised requirements for consumer product exposure warnings. This alternative was welcomed by the regulated community. It is used in many industries.

NAIMA supports OEHHA’s revised language as set forth in this most recent and final revision to uses of the Short Form.

Sincerely,

A handwritten signature in blue ink that reads "Angus E. Crane". The signature is fluid and cursive, with a long horizontal stroke at the end.

Angus E. Crane
Executive Vice President, General Counsel