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October 11, 2022

**Comment to
California Environmental Protection Agency
Office of Environmental Health Hazard Assessment
Regarding
Safe Drinking Water and Toxic enforcement Act of 1986, Proposition 65
Notice of Proposed Rulemaking, Title 27, California of Regulations
Amendment to Section 25705, Specific Regulation Levels Posing No Significant
Risk: Antimony Trioxide**

The PET Resin Association (PETRA) is the industry association representing the North American producers of PET (polyethylene terephthalate) resin. For more information about PETRA and PET resin, please see www.PETresin.org.

The proposed specific regulatory levels posing a no significant risk level (NSRL) for antimony trioxide should be limited to exposure by inhalation. The studies cited in support of the NSRL are based on inhalation exposure and extrapolation for ingestion. Consequently, the qualifier “by inhalation” should be added to the NSRL for antimony trioxide.

PET is widely used around the globe to package foods and beverages, especially soft drinks and water, as well as other foodstuffs, personal care items and pharmaceuticals. The use of antimony and antimony compounds in food-contact and medical applications (such as PET) is evaluated and regulated for safety by the U.S. Food and Drug Administration, as well as the European Food Safety Authority in Europe, Health Canada, and sister agencies around the world. Given the safety assessments and regulation of antimony compounds for food and medical applications by other regulatory agencies, and the limited data supporting the application of the NSRL for exposure by ingestion, the proposed NSRL for antimony trioxide should be limited to exposure by inhalation.

Sincerely,

John E. Heinze, Ph.D.
Kellen Company
On Behalf of PETRA