

To: Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor Sacramento, California 95814
Submitted via: <https://oehha.ca.gov/comments>

October 30, 2022

RE: Notice of Intent to List Chemical by the Labor Code Mechanism: Antimony (Trivalent Compounds)

Dear Ms. Barajas-Ochoa,

Thank you for the opportunity to provide comments on the Notice of Intent to List Chemical by the Labor Code Mechanism: Antimony (Trivalent Compounds). This letter is submitted on behalf of the undersigned public and environmental health organizations. The proposed listing of trivalent antimony compounds is based on an appropriate and established listing mechanism, and we support the proposed listing under Proposition 65.

Background on the Labor Code Mechanism

According to The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65), there are four ways to add a chemical to the list. One of these is the listing of a chemical by the Labor Code (LC) mechanism. This specifically refers to California's Labor Code section 6382(b)(1)¹, which "incorporates chemicals identified by the World Health Organization's International Agency for Research on Cancer (IARC) as causing cancer in humans or laboratory animals."² The Proposition 65 list is required to contain chemicals identified by reference to the Labor Code. Therefore, IARC's recognition of a chemical as causing cancer in humans or laboratory animals triggers the listing of that chemical under Proposition 65.

IARC has identified Trivalent Antimony Compounds as Human or Animal Carcinogens

In March 2022 The meeting for IARC Monographs Volume 131: Cobalt, Antimony Compounds, and Weapons-Grade Tungsten Alloy, was convened by the International Agency for Research on Cancer (IARC). This meeting produced an assessment of compounds including trivalent antimony compounds; the summary findings are available in an article published in The Lancet

¹ https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=LAB§ionNum=6382

² <https://oehha.ca.gov/proposition-65/how-chemicals-are-added-proposition-65-list>

Oncology³. The full assessment will be published in Volume 131 of the IARC Monographs⁴. The Lancet Oncology summary states that “Trivalent antimony was classified as ‘probably carcinogenic to humans’ (Group 2A), based on ‘limited’ evidence for cancer in humans, ‘sufficient’ evidence for cancer in experimental animals, and ‘strong’ mechanistic evidence in human primary cells and in experimental systems.”²

Proposition 65 listing of Trivalent Antimony Compounds is Appropriate

OEHHA is correct that IARC’s recognition of trivalent antimony compounds as carcinogens necessitates its listing in the Labor code, and, by extension, under Proposition 65. We agree with OEHHA that trivalent antimony compounds meet the requirements for causing cancer specified in Health and Safety Code section 25249.8(a), Labor Code section 6382(b)(1), and Title 27, Cal. Code of Regs., section 25904(b).

Thank you for considering these comments.

Signed,

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³ Karagas MR, Wang A, Dorman DC, Hall AL, Pi J, Sergi CM, et al. (2022). Carcinogenicity of cobalt, antimony compounds, and weapons-grade tungsten alloy. *Lancet Oncol*, Published online 7 April 2022; [https://doi.org/S14702045\(22\)00219-4](https://doi.org/S14702045(22)00219-4)

⁴ IARC Monographs On The Identification Of Carcinogenic Hazards To Humans. <https://monographs.iarc.who.int/> Accessed October 10, 2022.

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