

November 18, 2023

Submitted via: <https://www.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: Proposal to make the Proposition 65 short-form warning more informative to consumers

Dear Monet Vela:

Intex Recreation Corp. (IRC) distributes, throughout the United States, Intex branded consumer products including storable above ground swimming pools, inflatable spas, inflatable mattresses, pool floats, inflation pumps, inflatable boat and kayak sets, and related accessories. These consumer products are sold through numerous retail channels including big box mass, club stores, home improvement, sporting goods, specialty, and on-line internet. These products provide great value to consumers who want to provide their families and friends with a great recreational experience.

IRC agrees with OEHHA that the short form warnings should provide sufficient information for consumers to make informed choices about their exposures to listed chemicals in consumer products. IRC sells and distributes products that include the short-form warning. Since 2018, IRC has included the chemical of concern within its short-form warning. Specifically, “Warning: Reproductive harm – BPA – WWW.P65WARNINGS.CA.GOV”. The following are two examples of IRC’s presentation on retail packaging.

KRYSTAL CLEAR™
Cartridge Filter Pump
C330



INCLUDES ONE
CARTRIDGE TYPE

H

Filter cartridge is quick and easy to clean or replace

- Easy pump installation – Just attach hoses and plug pump in
- Includes two 1½in diameter hoses with clamps
- Includes one HydroAeration® Technology inlet fitting
- 25ft power cord with a built-in GFCI for protection
- Convenient air release valve for easy pump priming
- Conforms to UL and CSA standards

Energy-saving timer built into the GFCI plug

- Easily set daily pump run time from 2 to 10 hours
- Pump turns on and off automatically each day



Specifications

Certified Model	601
Turnover rate/System flow	300 GPH (1.1m³/hr)
Max pool size/Water capacity	2,400 gal (9.0m³)



2
YEAR
LIMITED WARRANTY

#28601EG



0 78257 31232 0
Manufactured by / Fabricado por
Intex Industries (Xiamen) Co., Ltd.,
Xiamen, Fujian, P.R.C.



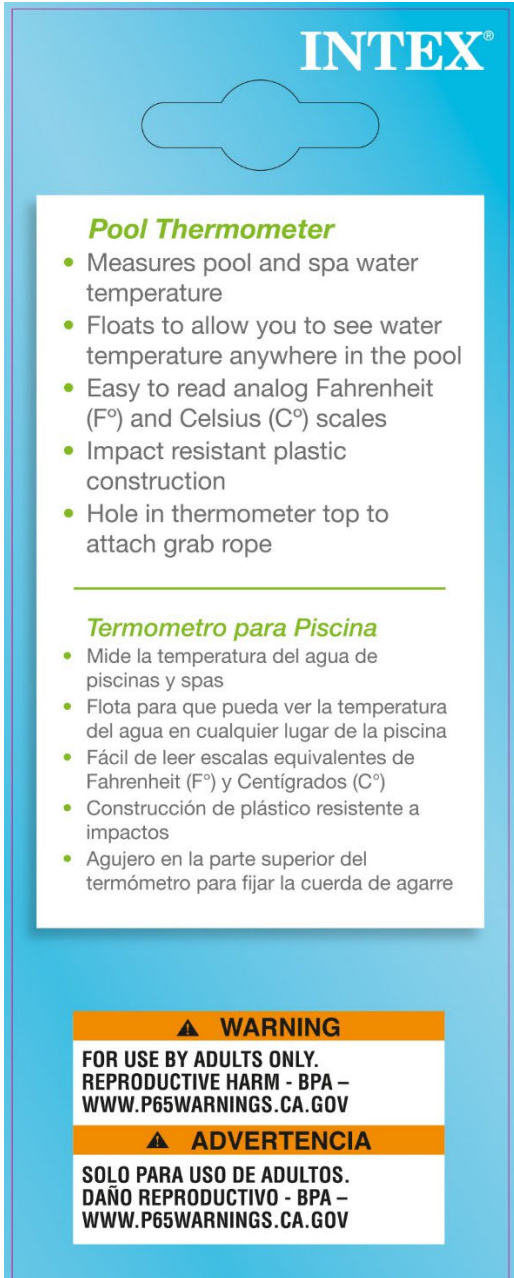
WARNING

**READ AND FOLLOW ENCLOSED OWNER'S MANUAL.
FOR USE BY ADULTS ONLY. REPRODUCTIVE HARM -
BPA – WWW.P65WARNINGS.CA.GOV.**

ONE FILTER PUMP
WITH CARTRIDGE AND HOSES

330
GPH

110 -
120V



We would like to offer the following comments on the revised proposed rule.

The short form warning should be adjusted only to include the exposure chemical as IRC has done successfully since 2018. Adding additional wording such as proposed “**Risk of reproductive harm from exposure to** [name of chemical]. See www.P65Warnings.ca.gov.” only makes the short form warning longer without adding any additional information to inform the reader. Further, making the warning text longer will serve to discourage consumers from reading the warning and does nothing to increase comprehension. Lastly, the increased length of the warning may not fit on smaller packages, particularly when presented in multiple languages.

If you have any questions about the foregoing comments, please contact me at (310) 507-2661 or mwhalen@intexcorp.com. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Matthew Whalen III', written over a light blue circular stamp.

Matthew Whalen
Director of Risk Management