



**POOL &
HOT TUB**
ALLIANCE

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June 28, 2024

Ms. Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
Sacramento, CA 95812-4010

These comments submitted online at: <https://oehha.ca.gov/comments>

Dear Ms. Vela:

The Pool and Hot Tub Alliance (PHTA) appreciates the opportunity to comment on and participate in the Office of Environmental Health Hazard Assessment's ("OEHHA") rulemaking process and your consideration of our comments to the October 27, 2023, 45-day express terms.

Though many of the changes in the 15-day language addressed concerns expressed in our October 27 comments, the chief concern we expressed, relating to specific naming of a chemical and the likely consequences of doing so, remains.

PHTA anticipates that there will be an increase in Proposition 65 enforcement lawsuits in the wake of these proposed changes should they take effect. The outcome will be a dramatic negative impact on pool and hot tub manufacturers and suppliers despite their best efforts to adhere to these regulations.

On behalf of its members, PHTA again asks the Office to please consider withdrawing the plan to implement these changes to the Proposition 65 Safe Harbor labeling requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "GC", is written over a light blue horizontal line.

Gregory Ceton
Director, Codes and External Standards
Pool and Hot Tub Alliance

cc. Justin Wiley, Vice President, Government Relations, Standards, and Codes, PHTA
Tyler Jones, Director, Government Relations, PHTA
Seth Ewing, Senior Director, Member Programs and Services, PHTA