



May 28, 2015

Ms. Esther Barajas-Ochoa
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-19B
Sacramento, California 95812-4010

Dear Ms. Barajas-Ochoa,

Improvera USA LLC ("Improvera") is providing herein comments to OEHHA's April 23, 2015 announcement of the intent to list "*Aloe vera*, whole leaf extract" as a chemical known to the State to cause cancer under the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) due to its identification by the International Agency for Research on Cancer (IARC) as "possibly carcinogenic to humans" (Group 2B).

Improvera conducts significant trade in *Aloe vera* (aloe vera) ingredients on a global basis that are not covered by the proposed listing and respectfully requests that OEHHA modify the title of the material to be listed, so as to reduce any potential confusion that may occur between the proposed chemical and our ingredients. Our *Aloe vera* ingredients are substantially different than the material identified by IARC that is the subject of the proposed listing.

Our *Aloe vera* ingredients are derived from both the inner leaf and the entire leaf of the aloe plant and are purified by a process known as decolorization to remove known constituents of concern. The IARC *Aloe vera* monograph explains that this process results in a material identified as "*Aloe vera* decolorized whole leaf extract" with quite different properties from the (non-decolorized) whole leaf extract covered in the OEHHA Proposition 65 listing.

In order to avoid confusion of what the proposed Proposition 65 listing covers and what it does not cover, Improvera respectfully requests that the title of the proposed material be properly identified as "*Aloe vera*, non-decolorized whole leaf extract" with an appropriate description to clarify that this material is an unpurified ingredient. We feel that this would provide a significant and important point of difference in order for us to properly inform our customers: and it is consistent with how the material of concern has been variously identified, including by the National Toxicology Program in the two-year carcinogenicity study that is the basis for the IARC classification.

In summary, Improvera requests that the *Aloe vera* material that is the subject of Proposition 65 proposed listing be identified with the underlined term inserted to read "*Aloe vera*, non-decolorized whole leaf extract."

Sincerely,

Improvera USA
Peter Hafermann
President

