

TERRY
LABORATORIES
QUALITY ALOE VERA EXTRACTS & CONCENTRATES



Terry Laboratories, LLC
7005 Technology Drive
Melbourne, FL 32904 USA

Phone: 321-259-1630
Fax: 321-242-0625

June 1, 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,

Terry Laboratories LLC is providing here 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).

Terry Laboratories LLC conducts significant trade in *Aloe vera* (aloe vera) raw materials 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 materials.

Our products are substantially different than the material identified by IARC that is the subject of the proposed listing. Some of our materials are derived from aloe vera whole leaf that has been purified by a process known as decolorization to remove known constituents of concern. In addition, other materials that we manufacture are derived from the aloe vera inner leaf and do not contain the known constituents of concern from the aloe vera latex. The IARC aloe vera monograph clearly identifies four unique materials derived from *Aloe vera*, and how each material is different from the (non-decolorized) whole leaf extract that is the subject of the IARC classification.

In order to avoid confusion of what the proposed Proposition 65 listing covers and what it does not cover, Terry Laboratories LLC respectfully requests that the title of the proposed material be modified to read "*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, Terry Laboratories LLC requests that the aloe vera material that is the subject of Proposition 65 be identified with the underlined term inserted to read "*Aloe vera*, non-decolorized whole leaf extract."

Sincerely,

A handwritten signature in cursive script, appearing to read "Laurie Chatman".

Laurie Chatman
Technical Director
lsc@terrylabs.com