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COEH

Center for Occupational and Environmental Health
University of California, Berkeley
School of Public Health
50 University Hall #7360
Berkeley, CA 94730-7360

Comments on Hazard Traits pursuant to Health and Safety Code §25251
Proposed by the Office of Environmental Health Hazard Assessment

Submitted via email to Fran Kammerer at fkammerer@oehha.ca.gov

Fran Kammerer
Office of Environmental Health Hazard Assessment
P. O. Box 4010, Sacramento, California 95812-4010

February 15, 2011

I am writing in support of the proposal by the Office of Environmental Health Hazard Assessment (OEHHA) that defines the hazard traits, environmental and toxicological endpoints, and other relevant data as required by Health and Safety Code §25251, established in 2008 by SB 509 (Simitian).

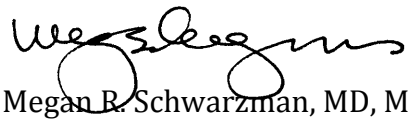
Health and Safety Code § 25256, *et seq*., adopted pursuant to SB 509, requires the Department of Toxic Substances Control (DTSC), to establish a Toxics Information Clearinghouse (TIC), a publicly accessible repository of information about chemicals and the potential hazards they may pose to human health or the environment. Under this statute, OEHHA is tasked with identifying the "hazard traits, environmental and toxicological endpoints, and other relevant data" for inclusion in the TIC.

The TIC has the potential to increase information in the marketplace of chemical users --including the public, downstream businesses, workers, government, and retailers— on the use and potential impacts of synthetic chemicals in consumer products. This will serve many purposes, including as a vehicle for informing the evolving list of chemicals of concern by DTSC, as required for implementation of the Safer Consumer Products Regulations established by AB 1978 (Feuer).

OEHHA's current proposal provides an essential first step toward establishing the TIC and identifying chemicals of concern to the state of California. This forward-looking proposal defines hazard traits, and is independent of any recommendations for chemical screening. This provides an excellent framework for facilitating the challenging process ahead—that of selecting the endpoints for which chemicals should be tested. This framework is particularly useful because toxicity testing methods are rapidly evolving, and the development of new methods hinges on rigorous identification of endpoints associated with hazards.

OEHHA has created a robust framework for understanding how chemicals can pose hazards to human health and the environment by building on those traits identified by authoritative bodies in the California, the U.S., Canada and Europe. OEHHA has brought contemporary scientific evidence to bear on these lists by including traits such as epigenetic effects, key ecotoxicological hazard traits, and endpoints that can serve as upstream indicators of hazard. I support moving ahead with this proposal.

Respectfully Submitted,



Megan R. Schwarzman, MD, MPH
Environmental Health Scientist, Center for Occupational and Environmental Health
Associate Director of Health and Environment, Berkeley Center for Green Chemistry