



Nov 8, 2021

Tyler Saechao and OEHHA leadership,

CleanEarth4kids.org asks you to list PFOS as carcinogenic under Prop 65. We would also ask that all PFAS be added to Prop 65. PFOA was listed under Prop 65 in Sept 2019 because it can cause birth defects and other reproductive harm.

PFAS must be treated as a class. DTSC has already determined "regulating individual PFAS is ineffective" and California treats them as a class as shown by SB343, AB1200, AB1201 which were signed by Governor Newsom on Oct 5, 2021.

According to the EPA, both PFOS and PFOA "are toxic to laboratory animals, producing reproductive, developmental and systemic effects in laboratory tests" and "suggestive evidence that PFOS and PFOA may cause cancer".

Perfluoroalkyl and polyfluoroalkyl substances, called PFAS, are a class of over 9,000 synthetic chemicals found in many products like food packaging, waterproofing sprays, household cleaners, stain resistant carpet, nonstick cookware and fire fighting foam. PFAS as a class share many characteristics and toxicity.

PFAS are known as "forever chemicals" as they are extremely strong and don't break down in the environment or in our bodies. They are linked to liver damage, thyroid disease, developmental and reproductive problems, high cholesterol, obesity, immunity issues, hormone suppression and several types of cancer.

DuPont was sued in 1999 over PFOS and PFOA contamination. Documents revealed DuPont and PFOA inventor 3M had secretly been doing medical studies on PFOA for over 40 years. 3M researchers stated in 1978 that PFOA and PFOS "should be regarded as toxic". In 1981, 3M found that PFOA caused birth defects in rats. DuPont knew PFOA causes cancerous tumors in lab animals by the 1990s. In 2005,

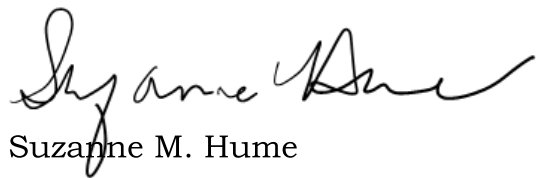
DuPont reached a \$16.5 million settlement with the EPA for concealing their knowledge of PFOA toxicity.

Despite all this, PFAS including PFOS and PFOA remain unregulated and continue to be used. Research shows widespread PFAS contamination of drinking water and studies by the CDC showed at least 12 PFAS in the blood of almost all Americans.

We must take immediate action to reduce PFAS in our environment.

Thank you for working on this urgent matter.

Sincerely,



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Informational Links:

[nytimes.com/2016/01/10/magazine/the-lawyer-who-became-duponts-worst-nightmare.html](https://www.nytimes.com/2016/01/10/magazine/the-lawyer-who-became-duponts-worst-nightmare.html)

[ewg.org/pfastimeline/](https://www.ewg.org/pfastimeline/)

[ewg.org/interactive-maps/pfas_contamination/](https://www.ewg.org/interactive-maps/pfas_contamination/)

[ewg.org/news-insights/news-release/2021/10/ewg-study-almost-42000-sources-toxic-forever-chemicals-could-be](https://www.ewg.org/news-insights/news-release/2021/10/ewg-study-almost-42000-sources-toxic-forever-chemicals-could-be)

[ewg.org/areas-focus/toxic-chemicals/pfas-chemicals](https://www.ewg.org/areas-focus/toxic-chemicals/pfas-chemicals)

[atsdr.cdc.gov/pfas/health-effects/us-population.html](https://www.atsdr.cdc.gov/pfas/health-effects/us-population.html)

[cdc.gov/biomonitoring/PFAS_FactSheet.html](https://www.cdc.gov/biomonitoring/PFAS_FactSheet.html)

ehp.niehs.nih.gov/doi/full/10.1289/EHP7431

comptox.epa.gov/dashboard/chemical_lists/pfasmaster

[epa.gov/sites/default/files/2017-12/documents/ffrrofactsheet_contaminants_pfos_pfoa_11-20-17_508_0.pdf](https://www.epa.gov/sites/default/files/2017-12/documents/ffrrofactsheet_contaminants_pfos_pfoa_11-20-17_508_0.pdf)