



**MOTORCYCLE
INDUSTRY
COUNCIL®**



September 7, 2026

VIA: OEHHHA Web Portal (<https://oehha.ca.gov/comments>)

Tina Cox, Section Chief
Office of Environmental Health Hazard Assessment
1001 I Street, P.O. Box 4010
Sacramento, CA 95814

Re: Proposed 2026 Proposition 65 Omnibus Amendments

The Motorcycle Industry Council (MIC), the Specialty Vehicle Institute of America (SVIA), and the Recreational Off-Highway Vehicle Association (ROHVA) represent hundreds of vehicle, parts, accessory, garment, and other product manufacturers, distributors, dealers, and retailers in the powersport industry. We respectfully submit these comments to the Office of Environmental Health Hazard Assessment (OEHHHA) regarding its proposed 2026 Proposition 65 (Prop 65) omnibus amendments.

We appreciate OEHHHA's efforts to provide manufacturers of off-highway vehicle parts greater warning language flexibility. **We request additional flexibility for quick response (QR) code warning options and seek confirmation on the acceptability of packaging labels for very small parts.**

The proposed amendments to Section 25602 include an option for product-specific warnings by a QR code. **Manufacturers request the flexibility for a single QR code taking consumers to a searchable landing page or a page listing multiple part numbers rather than requiring product-specific pages for every SKU.**

In addition, the proposed omnibus doesn't address pending vehicle interior lining warning requirements. Compliance with this pending interior lining warning requirement could include numerous vehicles for some manufacturers. **Manufacturers request the ability to include these pending warning requirements in QR code and digital application options.**

This requested QR code flexibility will be very beneficial in reducing development and compliance burdens and costs for manufacturers having a larger number of part SKUs and vehicles subject to the requirements.

For internet sales, manufacturers also request confirmation that packaging labels containing warnings are acceptable for small parts where direct labeling is impractical. The ability to use packaging labels is important as packaging labels may have more available space to include messaging that would otherwise not fit directly on small parts that are sold.

We believe the additional flexibility we request will better enable manufacturers to comply with the proposed requirements of this proposed omnibus amendment effort while minimizing burden and cost. We look forward to opportunities to continue working with OEHHA to improve Prop 65.

Feel free to contact me at ebarnes@mic.org or (949) 805-1712 if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read 'Eric Barnes', is positioned above the printed name.

Eric Barnes
VP Technical Programs