

Submitted via the Office of Environmental Health Hazard Assessment online comment portal

September 8, 2026

Kristina Thayer, Ph.D.
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
P.O. Box 4010
Sacramento, California 95812-4010

Re: Office of Environmental Health Hazard Assessment Proposed Regulatory Amendments
to Proposition 65: Draft Regulatory Language Omnibus 2026

Dear Dr. Thayer:

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI), submits the following comments to the California Environmental Protection Agency Office of Environmental Health Hazard Assessment (OEHHA) in response to the Proposed Regulatory Amendments to Proposition 65, released on July 22, 2026.¹ AHRI members appreciate the opportunity granted by OEHHA to provide stakeholder commentary in response to these proposed changes.

AHRI represents more than 330 manufacturers of heating, ventilation, air conditioning, refrigeration (HVACR) and water heating equipment. It is an internationally recognized advocate for the HVACR and water heating industry and certifies the performance of many of the products manufactured by its members. In North America, the annual economic activity resulting from the HVACR and water heating industry is more than \$211 billion. In the United States alone, AHRI member companies, along with distributors, contractors, and technicians, employ more than 700,000 people.

AHRI supports OEHHA's proposed amendment to 27 CCR § 25602(a)(2)(B) to add Quick Response (QR) codes as a warning method for consumer product exposures. HVACR and water heating manufacturers produce and sell many different finished products and parts that may each contain different chemicals from the Proposition 65 list. It is burdensome for manufacturers to create different warnings for each of their products and parts, if they are sold separately. OEHHA's proposal to use QR codes as a warning method streamlines the number of unique warnings needed for manufacturers' product line without hampering the intent of Proposition 65 and allows for much needed flexibility. AHRI supports and appreciates OEHHA's recognition to

¹ *Proposition 65: Omnibus 2026 Pre-Rulemaking*. Oehha.ca.gov. (2026). <https://oehha.ca.gov/proposition-65/crn/proposition-65-omnibus-2026-pre-rulemaking>

provide multiple pathways for compliance which eases the regulatory burden for manufacturers as they evaluate which warning method works best for their specific products.

During OEHHA's Proposition 65 Pre-Regulatory Workshop, held on July 30, 2026, OEHHA prompted stakeholders to consider what webpage should the QR code bring the consumer to. AHRI proposes that the QR code links back to the product manufacturer's webpage. The manufacturer would be responsible for maintaining this webpage and populating it with information required by Proposition 65. This ensures that the information is always current and accurate.

AHRI appreciates the opportunity to submit these comments and welcomes the opportunity to discuss this issue further. AHRI supports OEHHA in its efforts to modernize Proposition 65 methods for exposure warnings.

Sincerely,

A handwritten signature in black ink, reading "Morgan Anderson". The signature is fluid and cursive, with the first name "Morgan" and last name "Anderson" clearly distinguishable.

Morgan Anderson

Manager, Policy

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