

Submitted via oehha.ca.gov

September 8, 2026

Office of Environmental Health Hazard Assessment

State of California

1001 I Street, 23rd Floor

Sacramento, CA 95812-4010

RE: Proposition 65: Omnibus 2026 Pre-Rulemaking Topic 7

To Whom It May Concern:

Thank you for the opportunity to provide comment on “Proposition 65: Omnibus 2026 Pre-Rulemaking” which was published on July 22, 2026 by the Office of Environmental Health Hazard Assessment (OEHHA). The National Pasta Association (NPA), which was founded in 1904, is a national trade association representing companies that manufacture, market, and distribute high-quality pasta and pasta-related products throughout the United States. Our members represent a significant majority of the pasta business in the United States and include manufacturers, millers, suppliers, and equipment manufacturers. NPA appreciates the opportunity to provide feedback on OEHHA’s pre-rulemaking regarding Proposition 65 specifically on Topic 7 (Adding QR codes as a warning method).

NPA supports OEHHA's proposal to expressly allow the use of QR codes as a method for providing Proposition 65 warnings, including on product labels, labeling, shelf tags, shelf signs, and posted signs. Under the proposal, consumers would be able to scan a QR code and immediately access warning information that complies with Proposition 65 content requirements. The addition of QR codes reflects modern purchasing practices and provides manufacturers and retailers with greater flexibility in communicating warning information. QR technology has become a widely recognized and commonly used tool that enables consumers to access detailed product information quickly and efficiently. The proposal gives businesses an additional compliance option while maintaining consumer access to warning information. We particularly appreciate that the proposed

language includes safeguards designed to ensure consumers are aware of the warning information available through the QR code, including accompanying text directing consumers to scan the code for Proposition 65 information. As consumer access to digital information continues to evolve, incorporating QR-code technology into the Proposition 65 warning framework represents a practical and appropriate modernization of the regulations. This flexibility can improve the delivery of information to consumers while reducing unnecessary labeling constraints for businesses.

Conclusion

For the reasons described above, we support OEHHA's proposed amendments under Topic 7 and encourage the agency to move forward with adoption. This revision modernizes warning communication methods, and enhance the overall usability and consistency of the Proposition 65 regulation.

For questions or additional information please contact Alexandria Fischer at afischer@kellencompany.com.

Sincerely,

A handwritten signature in black ink that reads "Kari A. Stringfellow". The signature is written in a cursive, flowing style with a large initial 'K'.

Kari Stringfellow

Executive Director, National Pasta Association