



June 15, 2015

Ms. Monet Vela
Office of Environmental Health Hazard Assessment
P.O. Box 4010
1001 I Street
Sacramento, California 95812-4010
Via email: P65Public.Comments@oehha.ca.gov

Re: Clear and Reasonable Warning Regulations- Lead Agency Website

Dear Ms. Vela:

On behalf of our nearly 25,000 member dentists, the California Dental Association ("CDA") appreciates the opportunity to provide comments on the Office of Environmental Health Hazard Assessment's ("OEHHA") Notice of Proposed Rulemaking regarding the Clear and Reasonable Warning Regulations in Article 6 in Title 27 of the California Code of Regulations pursuant to The Safe Drinking Water and Toxic Enforcement Act of 1986 ("Proposition 65"). Specifically, we would like to highlight our concerns with the absence of clarifying language regarding trade associations' ability to respond to information requests and provide data on behalf of their members.

CDA is committed to the success of our members in service to their patients and the public. CDA is the recognized voice for California dentists and their patients in promoting oral health and the profession of dentistry. As such, we are uniquely situated to provide chemical exposure information to OEHHA for the Lead Agency Website as a service both to our member dentists and the public.

The Agency's Initial Statement of Reasons (ISOR) very clearly describes the intention of the Agency to allow trade associations to provide information on behalf of its membership to the website, as well as the ability to respond to requests for information. This representative position to the Agency on behalf of trade association members will best serve the Agency in its goal of transparency by making clear, concise, and understandable information available to the public regarding chemical exposures. Our members want to protect patients under their care and their success is benefitted by the ability to rely on their staff and our association to take the lead on issues of data reporting and related administrative tasks.

While these sentiments seem to be echoed in the ISOR provided by the Agency, the regulatory language clearly states that "The manufacturer, producer, distributor, or importer of a product, including food, or a particular business that is providing a warning must provide the following information, when reasonably available, upon the lead agency's request, and within the timeframe specified in the request..." As this language is specific in its application, we request clarifying amendments to add Trade Associations to the list of entities approved to submit data and respond to requests as initially envisioned and proposed in the ISOR by the Agency.

CDA appreciates the efforts of OEHHA staff to assist with reasonable implementation of the updated warning notice and corresponding website. Please do not hesitate to contact me at 916.554.7340 or Brianna.pittman@cda.org with further questions, and thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Brianna Pittman", written over a light blue horizontal line.

Brianna Pittman
Legislative Director