



April 19, 2022

Ms. Monet Vela
Office of Environmental Health Hazard Assessment
1001 I Street, 23rd Floor
Sacramento, CA 95812-4010

Via portal at: <https://oehha.ca.gov/comments>

Re: Second Modifications to Proposed amendments to short form Proposition 65 warning [Notice of Rulemaking to Amend Article 6 dated January 8, 2021]

Dear Ms. Vela:

The Adhesive and Sealant Council appreciates the opportunity to comment on the second modifications to proposed amendments to short form Proposition 65 warning as provided in the Notice of Rulemaking to Amend Article 6 dated January 8, 2021.

After carefully reviewing the modifications, we acknowledge the improvements made by OEHHA to the prior amendments. We commend the Office of Environmental Health Hazard Assessment (OEHHA) for its attempts to address concerns raised by ASC and other commenters, specifically

1. removing the label size and package shape limitations on the use of short-form warnings;
2. removing the requirement that the font type size be the same as the largest type size; and
3. expanding the implementation period of the short-form warning amendments from one year to two years after the effective date of the amendments.

We remain concerned, however, about the proposed requirement to identify a specific chemical substance as part of the warning. This requirement would be problematic because it would require labels to be custom made, which would be enormously costly, and not pre-printed. The costs to comply should not be underestimated. Adhesive and sealant products are packaged in various sizes, both large and small, and in different shapes, including cylinders, tubes, etc. Many ASC members package their products in both multiple sizes and shapes. Customization on a warning label, therefore, will be an unnecessary burden, especially when consumers can easily obtain more detailed information via the P65 warnings website.

Once again, the Adhesive and Sealant Council appreciates OEHHA's attempts to further modify its proposed changes. We still have significant concerns regarding the proposed requirement to include a specific chemical as part of the Proposition 65 warning.

Sincerely,

A handwritten signature in blue ink that reads "W E Allmond IV". The signature is written in a cursive style with a long horizontal stroke at the end.

William E. Allmond, IV
President