

March 27, 2021

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

Dear Ms. Vela:

As leaders, innovators and manufacturers in America, we are committed to protecting human health and the environment, social well-being and the economic performance of the employees, communities, customers and consumers we serve. Every member of the value chain is committed to ensuring that chemicals and other products are developed, manufactured, distributed and used safely. To accomplish these goals and ensure that the supply chain is not disrupted at this critical time, the Office of Environmental Health Hazard Assessment should withdraw the misguided proposal to amend Proposition 65 short-form warning requirements.

Environmental laws and regulations should be designed with utmost care to ensure that they are effective and lift up communities. The proposed amendments would do the opposite, causing public confusion, harming innovation and competitiveness in a global market. At a time when the distribution of goods and lifesaving supplies is more important than ever before, we cannot afford to jeopardize interstate commerce, disrupt manufacturing and irrevocably impact the supply chain nationwide.

To avoid a state by state “patchwork” approach to labeling, we need a coordinated effort to establish consistent national standards that enhance protection of the public and the environment, promote investment and innovation, avoid duplication, public confusion and unnecessary negative economic impacts. Unfortunately, the proposal does the opposite.

When it comes to our workforce and the people we serve, no goal is more important than safety. We remain dedicated to protecting the people and the planet because communities thrive when they are connected to each other and can build a bright future together. To accomplish these goals and ensure that the supply chain is not disrupted at this critical time, the proposed rulemaking amending the short-form warning requirements under Proposition 65 should be withdrawn.

Sincerely,

The Adhesive and Sealant Council
AICC, The Independent Packaging Association
Air-Conditioning, Heating & Refrigeration Institute (AHRI)
Albaugh, LLC
Alfa Tools
The Aluminum Association
American Apparel & Footwear Association
American Coatings Association
American Forest & Paper Association
American Frozen Food Institute
American Home Furnishings Alliance

American Mold Builders Association
American Pet Products Association
American Sportfishing Association
American Wire Producers Association
American Wood Council
Appalachian Hardwood Manufacturers, Inc.
Arkansas State Chamber/Associated Industries of Arkansas
The Association for Hose and Accessories Distribution (NAHAD)
Associated Industries of Missouri
Associated Pacific Machine Corp.
Association of Equipment Manufacturers
Association of Home Appliance Manufacturers
Auto Care Association
Banner Engineering
Bergstrom Inc.
Birmingham Fastener
Bobrick Washroom Equipment, Inc.
Brick Industry Association
Brunswick Corporation
Brush Research Manufacturing Company Inc
The Business Council of New York State, Inc.
Business & Industry Association of New Hampshire
Business + Institutional Furniture Manufacturers Association
California Automatic Vending Association
California Manufacturers & Technology Association
California Pool & Spa Association
Can Manufacturers Institute
Continental Refrigerator
Core Molding Technologies
Coturnix, LLC
Council of Industry of Southeastern New York
Dyna-Mix Inc.
Ecological Fibers Inc.
Electronic Components Industry Association (ECIA)
Electronic Theatre Controls, Inc.
Fabricators and Manufacturers Association, International
Fender Musical Instruments Corporation
Ferro Industries, Inc.
Flexible Packaging Association
Formula Boats
Frozen Potato Products Institute
GE Appliances, a Haier company
Georgia Association of Manufacturers

Gerdau
The Gill Corporation
Gilster-Mary Lee Corp.
Global Metal Finishing, Inc.
Goizper Spraying NA, Inc.
Gordon Brush Mfg. Co. Inc.
Hearth, Patio & Barbecue Association
Hilti, Inc.
The Household & Commercial Products Association (HCPA)
Illinois Manufacturers' Association
INDA, The Association of the Nonwoven Fabrics Industry
Independent Lubricant Manufacturers Association
The Industrial Brush Company Inc.
Industrial Fasteners Institute
Industrial Minerals Association - North America
International Association of Plastics Distribution
International Sleep Products Association
International Wood Products Association
Iowa Association of Business and Industry
Irrigation Association
ISSA - The Worldwide Cleaning Industry Association
Jaz Brush USA, Inc.
JAZ USA Inc.
Kansas Chamber
KD Manufacturing, Inc.
Kelly-Moore Paint Co., Inc.
KEMET Electronics Corporation
Kentucky Association Of Manufacturers
Kitchen Cabinet Manufacturers Association
Koki Holdings America
Komatsu America Corp.
LBS
Leviton Manufacturing Co., Inc.
Loos & Co
Maine State Chamber of Commerce
Makita U.S.A., Inc.
The Malish Corporation
Manufacturers Alliance for Productivity and Innovation (MAPI)
Maryland Chamber of Commerce
Maverick Abrasives
McNaughton & Gunn, Inc.
Metabo Corporation
Metal Powder Industries Federation

MGK
Michigan Manufacturers Association
Mohawk Industries, Inc.
Monahan Partners, Inc.
Montana Chamber of Commerce
Motor & Equipment Manufacturers Association
National Association of Chemical Distributors
National Association of Manufacturers
National Association of Printing Ink Manufacturers (NAPIM)
National Automatic Merchandising Association
National Electrical Manufacturers Association (NEMA)
National Fastener Distributors Association
National Marine Manufacturers Association
National Oilseed Processors Association
National Shooting Sports Foundation
National Stone Sand and Gravel Association
National Tooling & Machining Association
National Waste & Recycling Association
Nevada Manufacturers Association
New Jersey Business and Industry Association
New Mexico Business Coalition
Next Generation Manufacturing
Non-Ferrous Founders' Society
North American Association of Food Equipment Manufacturers
(NAFEM)
North American Die Casting Association
North American Meat Institute
North American Millers' Association
Northeast Pennsylvania Manufacturers & Employers Association
Ohio Manufacturers' Association
Osborn
Otis Technology
Outdoor Power Equipment Institute
Pennsylvania Manufacturers' Association
PFERD Inc.
Phoenix Closures
Pioneer Packaging Inc.
Plastic Pipe and Fittings Association
Plastics Industry Association
Plumbing Manufacturers International
Plymouth Products Acquisition, Inc.
Pool & Hot Tub Alliance
Power Tool Institute

Precision Machined Products Association
Precision Metalforming Association
PRINTING United Alliance
Resilient Floor Covering Institute
Rhode Island Manufacturers Association
Rinnai America Corporation
Robert Bosch Tool Corporation
RV Industry Association
San Antonio Manufacturers Association
Shark Industries Ltd.
The Shyft Group USA, Inc.
SigmaTron International, Inc.
SNAC International
Society of Glass and Ceramic Decorated Products
Specialty Equipment Market Association
Specialty Tools & Fasteners Distributors Association (STAFDA)
Spiral Brushes Inc.
Spring Manufacturers Institute
Stanley Black & Decker
Starcke Abrasives USA, Inc.
Steel Manufacturers Association
Stockmeier Urethanes USA, Inc.
Stromberg Allen and Company
Strongwell
Sugar Creek Packing Co.
The Sulphur Institute
Sullair, LLC
Systems Technology, Inc.
TANIS Incorporated
The Technology and Manufacturing Association
Techtronic Industries Power Equipment
Texas Association of Manufacturers
Thermo Fisher Scientific
TRSA, the Association for Linen, Uniform and Facility Services
Unicorr Packaging Group
United Veterinary Services Association
Utah Manufacturers Association
Valley Industrial Association
Valvoline
Vinyl Institute
Virginia Manufacturers Association
Weiler Abrasives
Wisconsin Manufacturers & Commerce

The Wooster Brush Company
Zero Zone Inc.