July 31, 2013

Monet Vela  
Office of Environmental Health Hazard Assessment  
1001 I Street  
Sacramento, CA 95812

RE: Labor Code Workshop

Dear Ms. Vela:

The California Labor Federation writes in support of OEHHA’s efforts to establish regulations regarding the listing of chemicals under Proposition 65 using the Labor Code listing mechanism.

We believe that the regulatory language proposed by OEHHA is largely consistent with Proposition 65’s statutory language and the relevant court decisions.

However, as this regulatory process moves forward, we encourage OEHHA to consider that the landscape of regulatory toxicology is changing. Federal and international regulatory and toxicology agencies are adopting new testing methods—commonly called 21st Century Toxicology—that take advantage of the increasing knowledge about genomic and cellular mechanisms of toxicity and reduce reliance on older, less reliable animal testing protocols. We believe OEHHA should include language in these regulations that will allow OEHHA to make use of evaluations done by federal and international agencies that rely on modern testing methods.

Sincerely,

Mitch Seaman

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