



January 16, 2024

OEHHA  
Sacramento Office 1001 I Street  
Sacramento, CA 95814  
916-324-7572

Dear Members of the California Scientific Review Panel,

The Liver Coalition of San Diego is a local organization formed by medical specialists, transplant surgeons, patients, caregivers and health advocates to promote liver health and meet the needs of those affected by liver disease in San Diego County. *Our mission is to save lives by improving liver health and preventing liver disease through community-based education, linkages to care, advocacy and research programs.*

As deliberations on the proposed updates to the Inhalation Unit Risk (IUR) for ethylene oxide (EtO) continue, we respectfully call for the careful consideration of how this updated risk factor might inadvertently affect the availability of vital medical equipment and services.

Ethylene oxide plays an undeniably important role in our health care system's sterilization protocols, ensuring the safety and reliability of a wide array of medical devices. EtO sterilizes medical equipment that touches virtually every aspect of health care—from preventing infections during routine procedures or complex surgeries to protective equipment for our doctors and nurses.

The possible impacts to EtO sterilization facilities in California could have far-reaching consequences that not only disrupt the intricate processes of medical care but also unintentionally increase health care disparities and costs for our state's residents. For providers, shortages of medical equipment could mean postponing surgeries and other treatments. This is particularly concerning in urgent care and high-risk scenarios where the availability of sterilized equipment is critical.

With the aim of safeguarding public health, we encourage the SRP to conduct a thorough, evidence-based examination of the facts before concluding its recommendations. Ensuring a steady supply of sterile, indispensable medical technology is not merely a matter of healthcare logistics, it is vital to maintaining a healthy population.

We trust the Panel will consider these critical aspects, and we look forward to collaborating with you in the future.

Sincerely,

Scott A. Suckow  
Executive Director  
Liver Coalition of San Diego

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