



January 19, 2024

RE: Comments of Concern About Updated Cancer IUR Factor for Ethylene Oxide

Dear Members of the California Scientific Review Panel:

California hospitals' top priority is providing safe and timely care to patients. Access to reliable medical equipment is essential to deliver life-saving care to those in need. California Hospital Association (CHA) represents more than 400 hospitals and health systems across California. We are writing to offer comments of concern for possible unintended consequences resulting from the California Office of Environmental Health Hazard Assessment's updated cancer inhalation unit risk (IUR) factor for Ethylene Oxide (EtO).

We appreciate the Scientific Review Panel's (SRP) deliberate approach to weighing the proposal, and request that you take CHA's perspective into account as you consider the real-world impact of this adjusted factor.

It is our understanding that EtO is used to sterilize half of all medical devices. Some critical medical items, such as surgical kits, heart valves, pacemakers, and catheters, currently rely on EtO sterilization as the only large scale, viable, and safe option. The limitation of sterilization services without a workable alternative ready to replace existing sterilization capacity could jeopardize access to medical services ranging from preventative care to critical surgeries. Our members are concerned that there may be disruptions and delays in medical care due to medical device shortages if sterilization facilities are unable to operate.

Given how reliant our members and their patients are on consistent and timely access to safe and sterile medical devices, CHA requests that SRP considers all available data and creates feasible recommendations in order to allow for continuity in health care services for our patients.

Sincerely,

A handwritten signature in black ink that reads "Trina Gonzalez". The signature is fluid and cursive, with the first name being more prominent.

Trina Gonzalez
Vice President, Public Policy