



January 31, 2024

RE: Comments: IUR factor for Ethylene Oxide (EtO)

Dear Members of the California Scientific Review Panel,

On behalf of the California Chronic Care Coalition (CCCC), I am writing to voice our concerns regarding the Office of Environmental Health Hazard Assessment's (OEHHA) updated cancer inhalation unit risk (IUR) factor for ethylene oxide (EtO).

Our Coalition represents a wide range of Californians who live with chronic illnesses, and as such, we are acutely aware of the importance of maintaining access to high-quality, safe medical care, which includes the sterilization of medical equipment. Sterilized medical devices are essential for the effective management of chronic conditions, facilitating accurate monitoring, reducing the risk of infection, and addressing health issues through interventional means when necessary. These devices are integral to maintaining and improving the overall quality of life for individuals by ensuring that their health care needs are safely and effectively met.

We trust that the Panel recognizes the vital role medical devices play in the daily health management of those who rely on them and appreciates the current lack of alternatives to EtO for sterilization. While we acknowledge that EtO is a substance that requires careful oversight, we propose a critical analysis of the research informing the updated IUR. Important to consider is that the updated risk factor proposed by OEHHA, based on an EPA assessment from 2016, sets a standard above the levels of EtO present in the ambient air.

We strongly recommend that the Panel not only undertakes a detailed review of the most current scientific evidence, but also keeps the potential impacts on the availability of medical devices in mind before committing to any final recommendations.

Thank you for considering our perspective on this critical issue. We are committed to working collaboratively to find solutions that serve the best interests of all stakeholders involved.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Helms".

Elizabeth Helms
President and CEO