



Terry Laboratories, LLC
7005 Technology Drive
Melbourne, FL 32904 USA

Phone: 321-259-1630
Fax: 321-242-0625

January 7, 2016

Re: OEHHA Response to Comments Concerning the Notice of Intent to List Aloe Vera, Whole Leaf Extract and Goldenseal Root Powder as Causing Cancer under Proposition 65 (December 2015)

To Whom It May Concern:

On December 4, 2015, California's Office of Environmental Health Hazard Assessment (OEHHA) added "Aloe vera, non-decolorized whole leaf extract" and goldenseal root powder to the state's list of chemicals (California Proposition 65) known to cause cancer.

In April 2015 OEHHA proposed that "Aloe vera, whole leaf extract" be added to the Proposition 65 listing. The proposal was based on the classification of this material as "possibly carcinogenic to humans" by the International Agency for Research on Cancer (IARC). This classification was based on a two-year drinking water study by the National Toxicology Program (NTP). The material used in the study was identified as "non-decolorized whole leaf extract of Aloe barbadensis Miller". The IARC classification as "possibly carcinogenic to humans" is specific to this identified material. The extract used in the study is an unpurified Aloe vera product, not representative of commercially processed Aloe vera. The notice of intent also noted aloe ingredients *not* covered in this listing, specifically, Aloe vera decolorized whole leaf extract, Aloe vera gel, Aloe vera gel extract".

After consideration of public comments provided by the International Aloe Science Council (IASC) and aloe manufacturers knowledgeable of the commercial processing of Aloe vera, OEHHA added the clarification to the Proposition 65 listing as "Aloe vera, non-decolorized whole leaf extract".

Terry Laboratories' ***Aloe Vera Gels, Aloe Vera Leaf Gels, Aloe Vera Powders and Extracts*** will not be classified by OEHHA as a Proposition 65 chemical. The OEHHA listing identifies the chemical concerned as "Aloe Vera, *non-decolorized* whole leaf extract". All of Terry Laboratories' products (inner leaf and whole leaf) are decolorized during processing and therefore are not subject to the Proposition 65 listing.

Laurie Chatman
Technical Director