

Johnson & Johnson

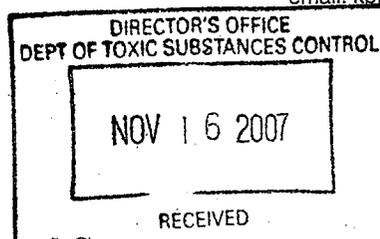
SERVICES, INC.

Katherine A. Procida
Executive Director
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November 16, 2007

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Linda S. Adams
Secretary for Environmental Protection
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95814



RE: California Green Chemistry Initiative - Additional Comments

Dear Secretary Adams:

On behalf of Johnson & Johnson and its family of companies, I appreciate the opportunity to provide additional comments on the California Green Chemistry Initiative.

Johnson & Johnson has identified a number of key policy points regarding green chemistry that we believe are important guidelines that will lead to the overall success of California's Green Chemistry Initiative.

Johnson & Johnson recommends specific policy points should be structured around the following policy goals and objectives:

Recommended Policy Goals:

- Green chemistry principles should be agreed upon and clearly articulated.
- Chemical hazards and risks should be described and communicated effectively with extensive and accessible data management.
- Toxic chemicals should be prioritized according to risk in a practical, objective and transparent manner using sound science.
- Green chemistry chemical evaluation process should be collaborative and include scientific experts in toxicity and exposure from all stakeholder groups.
- Voluntary collaboration with regulatory clout will support a green chemistry infrastructure to eliminate or mitigate hazard while promoting innovation and substitution.
- Green chemistry progress metrics should be developed and adopted with a commitment to transparency and proactive response to new information on any risk or benefit posed by chemicals.

Recommended Policy Objectives:

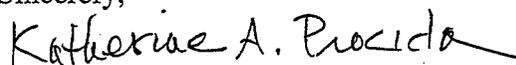
1. California should establish relationships with the Canadian and European chemicals management programs with a view to establishing data and information sharing among the jurisdictions. All efforts should be made to maintain consistency and harmonization with Canada and Europe to avoid duplication of effort.
2. As with the Canadian program, chemicals that are regulated by other agencies should not be subject to duplicative reporting and/or contradictory regulation under this initiative.

3. The California initiative should provide a well-defined prioritization mechanism. This screen should be based on both inherent chemical hazards and a qualitative evaluation of exposure potential. It should include a process for reaching decisions that involves stakeholders, is transparent and available on the internet with the screening criteria clearly explained.
4. California should develop pilot applications in close collaboration with key stakeholders to test various green chemistry policy options. Johnson & Johnson is willing to provide individuals with green chemistry scientific and policy backgrounds to be part of the pilot efforts.
5. Policy enforcement efforts should be pursued in two directions: voluntary with incentives and regulatory to dictate changes. The California Green Chemistry Initiative should leverage voluntary industry efforts to create better alternatives to high hazard substances, to mitigate risk and to make full use of market-based incentives. Recognition should be given for early adaptors and/or outstanding achievements in green chemistry. These would then be complemented by regulatory compliance to meet public expectations for safe chemical management.
6. California should create a clearinghouse of best green chemistry practices. There are numerous initiatives being conducted around the world with an existing and developing body of knowledge that can be leveraged to speed implementation.
7. California should develop a technical center of excellence in green chemistry as a key element of the California Green Chemistry Initiative. The center would be available to provide technical assistance, lead development of a green chemistry curriculum for undergraduate and graduate programs, and conduct state-of-the-art research on green chemistry innovations.
8. The California initiative should promote public education and awareness of chemicals used in commerce and the principles of green chemistry. Programs addressed to consumers or primary (K-12) education should focus on scientific literacy to create a broader understanding of the costs and benefits of both chemicals policy and product innovation. These programs should provide the foundation for effective communication using product labels, hazard warnings, etc., and other policy options.

Johnson & Johnson suggests green chemistry goals are similar in policy focus and intent to those of reducing greenhouse gas emissions. The California Climate Action Registry has been effective in protecting, encouraging and promoting early actions to reducing GHG emissions, and successful in engaging voluntary stakeholder participation. Such a vehicle could be used as a prototype for Green Chemistry Initiative efforts.

Please contact me (916) 443-0104 or Gavin McHugh (916) 930-1993 if we may be helpful in pursuing next steps.

Sincerely,



Katherine A. Procida
Executive Director

cc: Dan Dunmoyer, Governor's Cabinet Secretary
Cindy Tuck, Undersecretary Cal/EPA
Maureen Gorsen, DTSC Director
Leonard Robinson, DTSC Chief Deputy Director