BEFORE THE CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
DEVELOPMENTAL AND REPRODUCTION TOXICANT I.D. COMMITTEE

In the matter of
Request for Relevant Information on a
Chemical to be Considered by the OEHHA
Science Advisory Board’s Developmental and
Reproductive Toxicant (DART) Identification
Committee dated June 27, 2008, as extended
August 15, 2008.

The Consumer Healthcare Products Association ("CHPA"), Council for Responsible
Nutrition ("CRN"), and Natural Products Association submit this response to the request for
relevant information on the developmental and reproductive toxicity of caffeine.\(^1\) We join in

\(^1\) The Consumer Healthcare products Association ("CHPA"), founded in 1881, is committed to promoting the
increasingly vital role of over-the-counter (OTC) medicines and nutritional supplements in America's healthcare
system through science, education and advocacy. CHPA represents manufacturers and distributors of OTC
products and dietary supplements.

The Council for Responsible Nutrition ("CRN"), founded in 1973, is a Washington, D.C.-based trade association
representing ingredient suppliers and manufacturers in the dietary supplement industry. CRN's mission is to
enhance and sustain a climate for its member companies to responsibly market dietary supplements and their
ingredients by maintaining and improving confidence among consumers, media, government leaders, regulators,
healthcare professionals and other decision makers with respect to its members' products.

The Natural Products Association, founded in 1936 is the nation's largest and oldest non-profit organization
dedicated to the natural products industry. The Natural Products Association represents more than 10,000 retailers,
manufacturers, wholesalers and distributors of natural products, including natural/organic foods, dietary
supplements, and natural/organic personal care.
the comments of the American Beverage Association ("ABA") submitted by F. Jay Murray, Ph.D., and encourage the Office of Environmental Health Hazard Assessment staff to strongly consider the data outlined in ABA's submission as the Hazard Identification Document is prepared.

CHPA, CRN, and Natural Products Association members market over-the-counter medicines and dietary supplements, some of which include caffeine. These caffeine containing products provide important health benefits to consumers. As an example, caffeine is an effective analgesic adjuvant—that is, it enhances the pain-relieving effects of aspirin, acetaminophen, and ibuprofen. This effect is well established. See, e.g., Renner et al. (2007) Caffeine accelerates absorption and enhances the analgesic effect of acetaminophen, J. Clin. Pharmacol. Vol. 47 (6) 715-26; Migliardi et al. (1994) Caffeine as an analgesic adjuvant in tension headache, Clin. Pharmacol Ther. 56(5): 576-86; Schachtel et al. (1991) Caffeine as an Analgesic Adjuvant, Arch. Intern. Med. Vol. 151 (4) 733-37.

Given the widespread use of caffeine and its well documented benefits in over-the-counter medicines and dietary supplements, it is important that consumers are given information that is complete, accurate, and not misleading. We urge OEHHA to thoroughly evaluate all of the available data in preparing the Hazard Identification Document for caffeine.

DATED: October 27, 2008

Respectfully submitted,

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