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March 11, 2013

Alderman Edward M. Burke
121 N. LaSalle Street
Room 302
Chicago, IL 60602

Alderman William Burns
121 N. LaSalle Street
Room 200
Chicago, IL 60602

Dear Aldermen Burke and Burns:

The Consumer Healthcare Products Association (CHPA) takes this opportunity to respectfully express our opposition to proposed Ordinance #02013-1063, a measure proposing to ban the sale of products containing triclosan in the City of Chicago. CHPA is the national trade association representing the leading manufacturers and distributors of over-the-counter (OTC) medicines and dietary supplements in the United States. CHPA believes that banning the use of triclosan in OTC products will negatively affect the health of city residents.

Triclosan is found in a wide variety of personal care products, including antibacterial hand washes and dental care products and has been used safely as an antimicrobial ingredient for more than 40 years. Millions of consumers utilize triclosan-containing products safely and effectively as part their daily hygiene routines in homes, hospitals, doctors' offices, day care centers, nursing homes, and office and institutional settings.

Depending on its intended use as an OTC drug product or cosmetic, triclosan is regulated in a number of different ways. OTC drug products containing triclosan are regulated for safety and efficacy either under the Food and Drug Administration's (FDA) monograph system (for antibacterial hand wash products)¹ or, in the case of Colgate Total toothpaste, as an approved New Drug Application.²

Total toothpaste is clinically proven to reduce the bacteria and plaque that can lead to gingivitis. If left untreated, gingivitis can progress to periodontitis, a more serious and damaging stage of infection and resulting gum inflammation. Colgate Total provides both anti-bacterial and anti-inflammatory benefits. With the growing body of science linking oral health to overall health, this is an important advantage. Antibacterial hand wash products with triclosan reduce or

¹ FDA Tentative Final Monograph for Health-Care Antiseptic Drug Products, 1994 Fed Reg., Vol. 59(116): 31402-31452.

² FDA reviewed data on the safety and efficacy of triclosan in Colgate Total toothpaste in 1997 and found it to be both safe and effective for the treatment of gingivitis.

eliminate pathogenic bacteria on the skin to a significantly greater degree than plain soap and water.³

A number of scientific, transparent, and risk-based analyses have confirmed the safety of triclosan for its intended uses.^{4,5} Moreover, studies on triclosan and antimicrobial resistance have found no data linking outbreaks of antimicrobial resistant human and zoonotic pathogens to triclosan exposure⁶ and found that the use of antibacterial wash products in the home setting does not contribute to antibiotic resistance.⁷

CHPA thanks you for your consideration of these comments in opposition to proposed Ordinance #O2013-1063. I am more than happy to speak with you in greater detail about this issue. Please feel free to contact me at your convenience.

Best Regards,



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³ "A Meta-Analysis of the Published Literature on the Effectiveness of Antimicrobial Soaps", Montville, R. and Schaffner, D., *J Food Protect*, 2011; 74 (11): 1875-1882; "Best Practices for Determining Efficacy of Antibacterial Hand Wash Products"; Kruszewski FH, and Krowka JF, *Internal Medicine News Best Practices Supplement*, January 2011; "Effects of hand wash agents on controlling the transmission of pathogenic bacteria from hands to food" Fischler GE et al., *J Food Protect* 2007; 70:2873-7.

⁴ U.S. EPA. 2008, Reregistration Eligibility Decision for Triclosan, List B, Case 2340, Office of Prevention, Pesticides and Toxic Substances, Washington, D.C.

⁵ Preliminary Assessment: Triclosan, Health Canada/Environment Canada, March 2012, http://www.ec.gc.ca/ese-ees/6EF68BEC-5620-4435-8729-9B91C57A9FD2/Triclosan_EN.pdf

⁶ "Opinion on triclosan (antimicrobial resistance)", European Commission Scientific Committee on Consumer Safety; June 2010

⁷ "Investigation of Antibiotic and Antibacterial Susceptibility and Resistance in Staphylococcus from the Skin of Users and Non-Users of Antibacterial Wash Products in Home Environments," Cole EC et al., *Int J Microbiology Res* 2011; 3(2): 90-96; "Whither triclosan?", Russell AD, *J Antimicrob Chemo* 2004; 53: 693-695; "Comparative analysis of antibiotic and antimicrobial biocide susceptibility data in clinical isolates of methicillin-sensitive Staphylococcus aureus, methicillin-resistant Staphylococcus aureus and Pseudomonas aeruginosa between 1989 and 2000" Lambert RJ, *J Applied Microbiol* 2004; 97(4): 699-711; "Exposure of sink drain microcosms to triclosan: population dynamics and antimicrobial susceptibility" McBain AJ et al., *Appl Environ Microbiol*, 2003; 69(9): 5433-5442.