

INTERNATIONAL TECHNICAL CAMEL ASSOCIATION

1900 K Street, NW
Washington, DC 20006

October 17, 2013

Dr. Ruth Lunn
Director
ORoC, DNTP, NIEHS
P.O. Box 12233, MD K2-14
Research Triangle Park, NC 27709

Re: Nominations to the Report on Carcinogens

Dear Dr. Lunn:

I am writing on behalf of the International Technical Caramel Association (“ITCA”) in response to the September 20, 2013 notice appearing in the Federal Register regarding nominations to the Report on Carcinogens (“RoC”). Among the substances nominated to the RoC is 4-Methylimidazole (“4MEI”). As you may know, 4MEI is a constituent of caramel color. The American Beverage Association (“ABA”) has shared with us its commentary in response to the September 20 notice. We agree with ABA’s analysis and endorse its conclusion that 4MEI does not qualify, and should not be further considered, for listing as reasonably anticipated to be a human carcinogen or as a known human carcinogen.

Sincerely,

[Redacted]

Forrest L. Bayer