

Caffeine Should Not Proceed to a Hazard Identification Document

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Animal Studies

- Do not support a high priority
- Route of administration is critical
- Not a reproductive hazard, except when given at high, maternally toxic dose levels, which are not relevant to human exposure to caffeine in beverages
- NTP: “not a selective reproductive toxicant”

Not “clearly shown” to cause reproductive toxicity

- Caffeine will not meet the Prop 65 standard for listing
- Recent expert reviews conclude:
 - caffeine is safe at moderate exposure levels.
 - the data are inconclusive and conflicting at high exposure levels
- Falls short of “clearly shown ... to cause”

Warnings on soft drinks would not advance public health

- The naturally-occurring exemption would create confusion and misperception
- Warnings on soft drinks would contradict and conflict with current medical advice

Conclusions

- If listed, the inconsistent mix of warnings and no warnings would undermine public health and confuse the public
- Warnings would be at odds with physicians' message of moderate consumption
- Caffeine does not meet the “clearly shown” standard
- Caffeine should be a low priority and no HID should be prepared