



AMERICAN SPICE TRADE ASSOCIATION, INC.

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March 7, 2008

Dr. John Faust
Reproductive and Cancer Hazard Assessment Branch Office of Environmental Health
Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

Dear Mr. Faust;

We are writing concerning the OEHHA's request for information on the development of standards for the naturally-occurring level of lead in candies containing tamarind or chili.

The American Spice Trade Association (ASTA) is a trade association that represents the U.S. spice industry. It was founded in 1907 and represents the interests of approximately 175 members including companies that grow, dehydrate, and process spices. ASTA's members include U.S.-based agents, brokers, and importers, and companies based outside of the U.S. that grow spices and ship them to the U.S. and other companies associated with the U.S. spice industry. ASTA members manufacture and market the majority of spices sold in the U.S. at retail and to food processors.

ASTA supports the Food and Drug Administration (FDA) guidance that was issued in November 2006 concerning "Lead in Candy Likely to Be Consumed By Small Children." This guidance recommends a maximum lead level of 0.1 ppm in Mexican-style candy. FDA "considers the recommended maximum lead level to be achievable with the use of good manufacturing practices in the production of candy and candy ingredients and to be protective of human health."

Thank you for considering the position of ASTA members as you examine this issue. Please feel free to contact me if you have questions.

Sincerely,

Cheryl Deem
Executive Director