

From: [Jennifer Guild](#)
To: [CCB Meetings](#)
Cc: [Fenton Harvey](#); [Jason Banales](#)
Subject: Request to make a Public Comment at the Feb 20 Meeting of the CCB
Date: Wednesday, February 19, 2025 5:31:46 PM

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Hello.

I was hoping for an opportunity to enter a public comment at your meeting on February 20 through remote appearance or by way of this email:

I would like to ask the CCB to reconsider restricting terpenes to botanically derived sources. At Abstrax, we know the safety of a chemical is determined by its molecular structure, not its natural or synthetic origin. This key point is further discussed in the blog "*Natural versus Synthetic Chemicals Is a Gray Matter*" by Dorea Reeser (<https://www.scientificamerican.com/blog/guest-blog/natural-vs-synthetic-chemicals-is-a-gray-matter/>). Scientific evidence shows that some of the most toxic substances, such as botulinum toxin, are naturally occurring, while many synthetic chemicals are well-tested and safe for human use. Additionally, synthetic versions of natural compounds, like vitamin C and melatonin, are chemically identical and often safer due to controlled production and purification processes. Furthermore, pesticides and heavy metals are hazards more commonly associated with natural materials than synthetic ones. As demonstrated by the FEMA-GRAS program (<https://www.femaflavor.org/flavor-library/search?fulltext=8008-57-9>) and RIFM Fragrance Material Safety Assessments (https://fragrancematerialsafetyresource.elsevier.com/?field_cas_tid_1=64275-73-6&field_chemical_synonym_tid=), the safety of a chemical depends more on its structure than its natural or synthetic origin. Limiting flavoring terpenes to being botanically derived hinders creativity, imposes higher costs, and does not improve consumer safety in the legal market but instead makes the illicit market more appealing to consumers which ultimately increases public health and safety risks.

I would love an opportunity to discuss this with you further and answer any questions or concerns you may have about removing this restriction.

Thank you for your consideration,
Jen



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