



School of Computer, Mathematical, and Natural Sciences

August 26, 2018

Monet Vela
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010
<https://oehha.ca.gov/comments>

Re: OEHAA's decision on labeling coffee
Office of Environmental Health Hazard Assessment's proposed adoption of new section under article 7 no significant risk levels section 25704 exposures to listed chemicals in coffee posing no significant risk

Dear Ms. Vela,

On June 15, 2018, the California Office of Environmental Health Hazard Assessment (OEHHA) made a decision that "cancer warnings are not required for coffee under Proposition 65, the state's toxics right-to-know law." This decision was in part due to the findings of an extensive review done by members of the International Agency for Research (IARC) Working Group, which found no substantial evidence for carcinogenicity of coffee. **As a citizen, public health researcher, and a member of the IARC Working Group, I strongly endorse OEHHA's decision; IARC Working Group's conclusions were very well-researched and strongly justified. I firmly believe that labeling coffee as a carcinogen is misleading and will be detrimental to the health of our citizens.**

My name is Farin Kamangar, and I am a Professor and Associate Dean for Research at Morgan State University, Baltimore, MD, USA. I have been cross trained in Epidemiology (PhD, Johns Hopkins University), Biostatistics (MHS, Johns Hopkins University), Medicine (MD, Tehran University) and Public Health (MPH, Tehran University). I have conducted research on finding causes of cancer for two decades at several institutions, including at the U.S. National Institutes of Health, Bethesda, MD, USA. I have published nearly 200 peer-reviewed papers, primarily focused on the etiology of cancer. I have served as a reviewer for over 50 peer-reviewed journals, many specializing on cancer etiology, and have served on local, national, and international expert panels. As such, I believe I am highly qualified to comment on this topic.

In April 2016, the IARC Working Group, which I served as a member of, categorized coffee as "not classifiable (Group 3)" with regards to carcinogenicity in humans. To put this into context, Groups 1, 2a, and 2b agents are *definite*, *probably*, and *possibly* carcinogenic to humans, respectively.

Therefore, the new classification of coffee as Group 3 does not put it even in the *possibly carcinogenic* category.

In my opinion, the above-mentioned decision is strongly justified. Coffee is commonly consumed in many countries of the world, and people can provide reasonably good estimates of the duration and frequency of coffee drinking. Therefore, the association of coffee and cancer is very well studied. **The IARC Working Group reached their conclusion after an extensive review nearly 500 relevant studies of over 20 types of cancer.** Some of these studies were very high-quality, large-scale, prospective studies with hundreds of thousands of participants. For example, the NIH-AARP study, which was conducted by the U.S. National Institutes of Health in collaboration with the AARP enrolled over 500,000 participants, collected detailed information on coffee drinking habits, and followed the participants for many years. Put together, the long-term prospective studies reviewed by the IARC Working Group included several million participants from across the world who had been studied for many years. This is a substantial amount of data collected, and one would reasonably expect that these studies would have been able to detect even small potential associations with at least common types of cancer. After reviewing all evidence, there was no evidence for an association with any of the cancers studied. To the contrary, there was evidence that coffee could reduce the risk of liver and uterine cancers.

The IARC Working Group comprised an interdisciplinary group of 23 scientists from across the world, including several from the United States. Only scientists who were internationally recognized for their expertise on the matters studied in this Working Group and who did not have any conflict of interest were invited. These scientists had backgrounds in medicine, cancer epidemiology, cancer biology, and other related fields. They methodically researched and reviewed the entire literature known to them on the subject of coffee and cancer, including relevant data from human studies, animal studies, and laboratory studies. In particular, they did their best to review all published data from human studies. The group discussed the papers for their quality of evidence (based on factors such as prospective vs. retrospective study designs, quality and comprehensiveness of collected data, potential for any bias or confounding in the study design, adequacy of statistical analysis, and sample size), and categorized the results by cancer type. The process was very methodical, and the conversations were solely based on science. **Therefore, the IARC Working Group thoroughly reviewed and discussed the existing scientific literature, performed their due diligence, and did their best to be fair.**

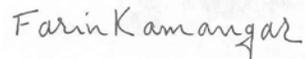
Coffee includes many chemicals, including some antioxidants, and may in fact be a healthy drink. Several well-designed studies have found regular coffee consumption may lower mortality rates. For example, Dr. Neal Freedman and his colleagues at the U.S. National Cancer Institute analyzed data from over 500,00 participants of the NIH-AARP study and found that coffee consumption was associated with a reduced overall risk of mortality (New England Journal of Medicine, 2012, PMID: 22591295). Based on this study and several similar studies, **Dr. Eliseo Guallar and his colleagues at Johns Hopkins University have suggested that “moderate coffee drinking can be part of a healthy diet (Annals of Internal Medicine, 2017, PMID: 28693039).”** While there is no definite conclusion as of yet that coffee reduces mortality rate, the current literature certainly point toward it.

The evidence presented above clearly argues that labeling coffee as a carcinogen furnishes wrong information to our fellow citizens, and may stop them from drinking what has been considered

by several public health experts part of a healthy diet. **Wrong and unjustified warnings may also overwhelm people and dilute the effect of other correct information that they receive from public health officials.** As such, I urge you to stand by your current position and do not label coffee a carcinogen.

I thank you for reviewing my letter. Please do not hesitate to contact me if you need any further information in this regard.

Sincerely,

A handwritten signature in cursive script that reads "Farin Kamangar". The signature is written in black ink on a light-colored background.

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