



August 27, 2018

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*Re: 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:

This letter is written in strong support of the new section under article 7 of Title 27 of the California Code of Regulations section 25704, stating that “exposures to Proposition 65 listed chemicals in coffee that are produced as part of and inherent in the processes of roasting coffee beans and brewing coffee pose no significant risk of cancer.”

As noted in the Informative Digest of the notice, “the International Agency for Research on Cancer (IARC)—the only Proposition 65 authoritative body to have evaluated coffee—concluded that coffee consumption is not classifiable as to its overall carcinogenicity and is associated with reduced risk of certain cancers in humans.” This also reflects the broad consensus of scientific and medical research on the subject: that there is no evidence of coffee causing an increased risk of cancer, and significant evidence that consumption of coffee decreases risk of certain cancers.

Since the intention of Proposition 65 is to make consumers aware of carcinogens in their environment, the inclusion of coffee warnings under proposition 65 creates confusion among consumers, causing them to avoid a potentially anti-carcinogenic beverage, and undermining consumer awareness of the scientific consensus on the matter. The Coffee Rule effectively rectifies this, and in our opinion will enable the consumer to be better served and protected.

We appreciate the opportunity to file this comment, and again encourage the OEHHA to adopt the new ‘Coffee Rule’ section.

Sincerely,

Peter Giuliano  
Chief Research Officer, Specialty Coffee Association

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