



May 8, 2015

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Re: DGAC Advisory Report

Dear Sir/Madam:

The National Coffee Association (NCA) appreciates the opportunity to comment on the Advisory Report of the Dietary Guidelines Advisory Committee (DGAC). The NCA represents the U.S. coffee industry, which generates \$36 billion annually in retail and foodservice sales, and conducts over \$5 billion in trade with 50 countries from Africa, Asia, and Latin America. In addition to the 2,300 roasters and importers, the industry is comprised of nearly 28,000 coffee cafés employing persons in every state and region. Through retail, restaurant and coffee café sales, the industry serves approximately 175 million consumers annually.

NCA strongly supports efforts to assist U.S. consumers in making educated choices toward achieving a healthy diet and lifestyle. The NCA also acknowledges the important work of the DGAC in providing a solid scientific evaluation that forms the basis of the Guidelines.

I. Coffee as Part of a Healthy Diet

The NCA would like to acknowledge and reinforce the DGAC's recommendation that the 2015 Dietary Guidelines include moderate coffee consumption, recognizing that it can be incorporated as part of a healthy lifestyle. In this context, the NCA also appreciates the apt distinction the DGAC draws between caffeine found naturally in coffee and caffeine added to other beverages or supplements.

As reviewed and recorded in the DGAC Advisory Report, there is an overwhelming body of research demonstrating that moderate coffee consumption in adults is not associated with increased risk of major chronic disease. Rather, coffee has been associated with preventive and protective outcomes with regard to cardiovascular disease, type 2 diabetes, several types of cancer, and overall mortality. Indeed, coffee is a complex mixture of hundreds of compounds, extant in the coffee bean and/or created naturally and spontaneously in the roasting process. While caffeine is among those compounds, it comprises only a tiny fraction of coffee chemistry.

We commend the DGAC's approach of using a modified Cochrane Collaboration approach to create an overview of systematic reviews and/or meta-analyses to address the relationship between typical/average caffeine/coffee consumption and health. The large body of scientific evidence which was evaluated supports that coffee is distinctly worthy of inclusion in the Dietary Guidelines. Additionally, we concur with the scientific conclusions reached that support the recommendation of incorporating coffee into a healthy lifestyle.

Compounds such as tocopherols, chlorogenic acid and methylpyridinium, along with hundreds of others, may be responsible for the aforementioned health benefits associated with moderate coffee consumption. Together, those compounds comprise a unique mix with a chemistry all its own, which has been associated in caffeinated and/or decaffeinated coffee with positive health outcomes.

II. Coffee and Caffeine

While coffee is inextricably connected with caffeine, it would be misguided to consider coffee and caffeine as one-in-the-same, interchangeable entities. Hence, the NCA supports the DGAC's recognition of the benefits of coffee, including the numerous, positive health associations substantiated by the scientific literature, including those independent of caffeine. As noted above, those positive health outcomes have been identified in caffeinated and/or decaffeinated coffee.

We recognize that caffeine is chemically the same whether found naturally in coffee or added to other foods and beverages. However, in any discussion of caffeine we believe it is important to note that coffee has a long history of safe consumption, and that distinctive consumer consumption patterns have developed that may differ from some other caffeinated foods and beverages. The NCA's experience indicates that coffee is typically consumed as a hot beverage that is sipped and savored over time. Coffee is also enjoyed for its widely recognized flavor profiles, for an extended taste experience and as an emblematic focus for social interaction. We also understand there has been concern raised that caffeine consumption in the general population is increasing. However, our market research data suggest that coffee consumption levels, and thus corresponding peer-reviewed assessments of historic and current dietary exposure to caffeine contributed by coffee, remain relatively consistent over time.

III. Conclusion

The NCA appreciates the opportunity to comment on the 2015 Dietary Guidelines Advisory Committee's recommendations for the 2015 US Dietary Guidelines for Americans. The totality of the evidence substantiates, and the NCA agrees with, the DGAC's recommendation to cite coffee specifically in the Guidelines, noting that coffee has a place in a healthy lifestyle based on the Committee's rigorous review of the scientific literature, which substantiates numerous, positive health associations that are distinct to coffee.

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Thank you for the opportunity to provide these comments on behalf of our members. Please do not hesitate to contact us if we may be of assistance.

Respectfully submitted,

A handwritten signature in blue ink, reading "William M. Murray". The signature is fluid and cursive, with a long horizontal flourish extending from the end of the name.

William M. Murray, CAE
President and CEO