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## STATEMENT

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### NCA Statement on Diacetyl

Diacetyl is a compound created naturally in cooking and fermentation. Thus, it appears when making butter, cheese, milk, yogurt, whiskey, wine, beer, vinegar, roasted coffee, processed tomato products, citrus juices, and a wide variety of other foods and beverages. It gives butter its taste and certain ales their distinctive flavors. Until recently, artificial diacetyl was commonly used as a flavoring agent.

Diacetyl and other naturally formed byproducts of processing, as well as added flavoring ingredients, need to be studied carefully, and the industry is engaging an independent, comprehensive scientific analysis of exposure hazard in the workplace. The presence alone of naturally occurring diacetyl in the workplace, which is likely to vary widely among locations in a given facility and among different facilities, does not automatically constitute a risk. Hazard potential from roasting and grinding of coffee is still being debated scientifically.

The average level of 5 parts per billion over an 8-hour work shift that is offered as a draft recommendation by the National Institute for Occupational Safety & Health (NIOSH) is exceedingly and unnecessarily low. The U.S. Occupational Safety and Health Administration (OSHA) has not indicated that they plan to adopt the NIOSH recommendation, which would require a rulemaking, and OSHA currently does not have a formal permissible exposure level. In fact, OSHA previously withdrew a proposed rulemaking on the subject of diacetyl.

It is important to note that coffee has been roasted, at times under less than ideal conditions, for centuries, and no evidence of widespread disease has been recorded. More importantly, the scientific evidence does not support the premise that exposure to diacetyl alone, created naturally in the roasting and grinding of unflavored coffee, increases the risk of BO or any obstructive lung disease. Properly designed and reviewed scientific studies are a recognized, crucial step necessary to draw any conclusions that are not influenced by "confounding factors" such as smoking, lack of exercise, unrelated environmental exposures and individual worker's prior health and work histories. This is especially important regarding diacetyl, which is highly volatile and dissipates rapidly when created in cooking or heating.

The NCA strongly encourages its members throughout the industry to meet and exceed all safety and health regulations to protect the health and well-being of their employees. We also encourage them to employ state-of-the-art equipment, engineering controls and safety protocols, to stay engaged by remaining aware of the scientific evidence regarding potential workplace hazards and, when appropriate, to engage with industry experts, scientific and governmental bodies to incorporate testing, measurement techniques and safety recommendations. Among such recommendations is OSHA's own requirement for worker protective measures under its General Duty Clause which, for volatile organic compounds (VOC) like diacetyl and 2,3-pentanedione includes adequate ventilation and environmental controls. The NCA recommends that all industry members comply fully with these OSHA safety measures.

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