

Technical and Regulatory Committee Meeting Minutes
Tuesday 11th June 2019
Room Machin - FDF, 6th Floor, 10 Bloomsbury Way, London, WC1A 2SL

Members present at meeting:

Tracy Brown	BCA Secretariat
Chris Stemman	BCA Executive Director
Nick Boxall	Complete Coffee Ltd (Chair T&R Committee)
Deirdre McCooley	Bewley's (via Conf Call)
Carla Politano	Costa
Jenny Breadmore	Fine Foods International Ltd
Rhodri Evans	Finlays
Eduardo Perez Martinez	JDE (via Conf Call)
Sarah Harrington	Masteroast
Chris Coates	Taylor's of Harrogate

Guest Speaker

Gordon Smith	HSE
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1. Apologies for absence:

Mike Saltmarsh	AVA
Andy Watson	Nestlé

2. Competition Law Compliance

It was confirmed that the meeting would run under the FDF competition law compliance rules, as per the Golden Rules previously distributed.

CS noted that NB has expressed his sincere apologies for not being able to Chair the meeting today.

3. Minutes of last meeting

Minutes of the last meeting were duly accepted without comment.

4. Matters Arising from Previous Minutes

No matters arising from the previous minutes.

5. Contaminants

CS noted that each year the ECF pull together a listing of European Legislation, please ask TB for a copy if you wish to have this.

- **OTA**

CS noted that the Spanish FSA have said they are concerned no OTA level on green coffee as consumed. They plan to raise their concern with the EU contaminants commission.

The Dutch are also looking at broadening the remit.

CC asked if Italy still have a set level, CS noted they do.

NB raised that when CS leaves, the larger companies used to pick things up at a European level, what will happen as we move forward without CS, it is a concern. (With this in mind this detailed set of minutes has been prepared).

CS noted that the Technical & Regulatory Committee may now start to see more information in their inboxes, perhaps at a lower level, but would be for information.

JB asked if CS sits on the ECF, CS noted he sits on the T&R Committee, and the Executive Committee but does not sit on the Contaminants Committee, this is by invitation only and for organisations that have laboratory facilities.

CC asked if a person from a BCA Member Company may attend the T&R Committee, CS said yes, they could but with a 'BCA' hat on, not as a representative of their specific company. The ECF Executive Committee is invitation only, so likely invite would only go out to the next ED.

TB noted that perhaps we need to ascertain if people want to receive information on specific topics, topics that they may specialise in. CS noted that members of the T&R need to collectively think how they want to be involved. We have 3 meetings a year, perhaps if there is a specific issue in the meantime conference calls could be arranged. CC noted that we need to arrange a call before Chris leaves on the 28th June.

Action: TB to arrange a call for

Tuesday 25th June at 10.30a.m.

Dial In +44 330 202 0877

Conf No. 1234#

Pin 1234

24.05 update from ECF

Please find enclosed a notice (Spanish) from AESAN (Spanish EFSA) informing of their **concern that green coffee has no OTA limit:**

- **Why suddenly now?** The use of green coffee in food supplements and infusions is proliferating. The green coffee is not subject to a thermic process (roasted, soluble) and therefore OTA is not controlled.
- **What do they propose?** To share their concern with the European Commission Contaminants Working Group!

Two years ago the EU started to discuss including new foods currently not yet regulated by Commission Regulation (EC) No 1881/2006. The targeted products were the following:

Foodstuffs	Maximum level for further consideration (µg/kg)
All dried fruits other than dried vine fruits	8.0
Entry on spices proposed to be replaced with the following:	
All spices including dried spices except <i>Capsicum spp.</i>	15
<i>Capsicum spp.</i> (dried fruits thereof, whole or ground, including chillies, chilli powder, cayenne or paprika)	20
Mixtures of spices	15
Dried Herbs, tea and herbal infusions	10.0
Sunflower seeds, pumpkin seeds, peanuts and processed products thereof	5.0
Pistachios, hazelnuts	5.0
Foods containing liquorice or liquorice extract placed on the market for the final consumer	10
Cocoa powder sold to the final consumer or as an ingredient in sweetened cocoa powder sold to the final consumer (drinking chocolate)	2.0

The discussion is currently suspended until the updated EFSA opinion is made available (Update on exposure assessment and hazard identification and characterisation). It would therefore make sense that Spain requests to introduce green coffee in the new regulated foodstuffs list. Nevertheless, as green coffee was not in the initial list, no assessment might be made by EFSA. Currently the EC is expected to be engaging with stakeholders (no specific activity has been identified between Jan-Jun 2019)

To be noted that the Netherlands also enforces national levels on a number of products including nuts, peanuts, cocoa and dried fruits. Dutch national legislation (<http://wetten.overheid.nl/BWBR0005758/2016-10-06>, article 12.1) stipulates that mycotoxins that could be harmful to public health should be absent in foods, drinks and raw materials. A level is associated with this for use in daily practice. The information required is derived from EFSA opinions, SANCO documents and draft regulations that have not yet been published or in force.

We shall continue to monitor and would appreciate if you could share anything that you might hear from your local authorities. Thank you!

No reports of OTA in coffee on RASFF since our last meeting.

- **Acrylamide (AA) Regulation**

Regulation (EU) 2017/2158 in force April 2018. No enforcement activity noted in the UK coffee industry, the FSA don't seem to have any capacity and pre-occupied with Brexit at the moment.

March 2019 – SCOPAFF considers setting MLs of acrylamide in biscuits and rusks for infants and young children, other cereal-based foods for infants and young children and baby foods. FDE pushing back citing the results of the BEUC AA survey (no compliance issues identified). No rapid determination method to allow positive release. Use of enzymes and yeasts preclude Organic status.

FDE – published 15th edition of the AA toolbox.

<https://www.fooddrinkeurope.eu/publication/fooddrinkeurope-updates-industry-wide-acrylamide-toolbox/>

Industry guidelines still hung up on FBO definition.

CS noted that he will not be attending the ECF AGM this month, but there will be another T&R meeting in the autumn than someone from the BCA Membership may wish to attend.

CC asked if we could have a UK version of the Toolbox, could CS look at this before he leaves.

Action: CS

Interesting ECF development:

An interesting debate takes place with Nestlé's proposal to request the European Commission to exempt coffee from any Acrylamide benchmark or ML based on IARC's findings and Prop 65 developments with the American FDA supporting coffee's exemption, as a starting point. As agreed in CONTAM the Secretariat is to look into the latest Prop 65 Developments and CONTAM is to start working on a science-based dossier together with ISIC in order to have it lined up for any current or future discussion on carcinogenic contaminants and coffee. T&R will be responsible for the story line and to determine how to best use the resulting document.

- **Furan (and its methyl derivatives)**

Not an awful lot of new developments in the last few months.

The ECF published a letter to the Commission, looking at methods of preparation.

ECF have called for data from Members.

The recent FoodDrinkEurope paper on Furan and Methylfurans published in Comprehensive Reviews and the ISIC review published in Food Chemistry are shared. As a follow up to the last EU Standing Committee on Plants, animals, Food and Feed (SCOPAFF) held on the 8th of February, there will be a monitoring of Furan and Methylfurans, having made reference during the meeting to the differences to be found between the levels in products as sold and as consumed (picking up on the FoodDrinkEurope and ISIC paper).

ECF was going to do a call for data but shall wait until the simplified SSD2 is approved by the EFSA collection Framework and made available. On the 16th of May, ECF has been invited to attend in Brussels, the EFSA Discussion Group on Food Chemical Occurrence Data that will include a dedicated training on competing the contaminants tool. Confirmation pending to determine if ECF members may also participate.

ECF sent letter to EFSA citing ISIC work:

Following up on the informative session on Furan and Methylfurans that EFSA organized in March 2017 and in which representatives of ECF, ISIC and FoodDrinkEurope participated, it was agreed that the coffee industry would share the results of the research that ISIC was supporting in relation to the occurrence and behavior of furan and its derivatives in coffee, once it was made available. The research was being conducted at the University of Zurich by Professor Chahan Yeretian and Dr Anja Rahn and the details of the research were presented by Professor Rodrigo Cunha who is an independent Scientific Advisor working with ISIC. The research has now been completed with the first study published in *Food Chemistry, Volume 272*, and the second published online with the same journal.

Please find enclosed copies of both studies for ease of reference,

- A Rahn & C Yeretian, 2019. **Impact of consumer behaviour on furan and furan-derivative exposure during coffee consumption. A comparison between brewing methods and drinking preferences**, *Food Chemistry, Volume 272*; 514-522.
- A Rahn et al, 2019. **Influence of lipid content and stirring behaviour on furan and furan derivative exposure in filter coffee**, *Food Chemistry*, published online.
- **Diacetyl**

Presentation given by Gordon Smith of HSE.

What is diacetyl?

- Organic compound
- a.k.a. 2,3 Butandione
- Yellow-green liquid
- Food flavouring

Background – general

- 2000 – Popcorn lung [Bronchiolitis obliterans] – Missouri
- 2006 – Diacetyl in coffee (roasting/grinding) – USA (Texas?)
- 2008 – DWP report to investigate causation
- 2011 – Bronchiolitis obliterans listed for compensation [C31]
- 2014 – proposed limits
 - USA 5ppb & 25ppb
 - Europe 20ppb & 100ppb

Background – HSE

HSE/HSL

- 2009-2010 – Flavouring companies – sampling
- 2014 – RR1021 – finalised report
- 2016 – HSL methodology & validation
- 2017 – Diacetyl in coffee roasting & grinding
- 2018 – *Discussions with the BCA*
- 2018 – EH40/2005 - inclusion
- 2018-19 – *Site visits to coffee processors**

JB asked if HSE were just looking at Coffee Roasters or Coffee Packers as well, GS confirmed they would eventually look at all.

GS noted that he was not sure how many studies/papers that were reviewed to come to the European level now set.

CC asked who would be managing SME's through to the micro roasters, HSE noted that the high street roaster would be looked after by the local authority, but they would have little to worry about!

GS noted the latest HSE actions.

- **Coffee processing including in food sector visits**
 - Green coffee bean – allergenic dust – tea and tea infusions may also fall within this remit. GS noted that they would inspect the area where the green beans are brought into the business hoppers, silos etc. to where roasted. GS confirmed that dust will have some allergenic properties.
 - Roast coffee – diacetyl and carbon monoxide
They will be looking from the roaster into the cooling area, there is a significant amount of diacetyl given off within that area.
CC asked if visits by the HSE are announced or planned, GS noted normally unannounced. If a secondary visit is required then this will be a planned visit.
 - Health surveillance
- **Safety Alert**
 - Outlines the issues
 - Control measures
 - Health surveillance
 - No formal HSE Guidance but.....will work with organisations to put guidance in place.

GS noted that if a safety alert is issued if there is significant health or safety issue, they will make other companies aware if there is a problem perhaps with a piece of machinery being used, for them to take actions.

Diacetyl – Proposed Safety Notice

Key Messages & Request for BCA Comments

- It's a hazardous substance; stringent WELs are in play.
- Need to prevent exposure by substituting to a safer alternative.
- If prevention is not possible, ensure effective control of exposure.
- Use HSE developed (or equivalent) sampling and analytical methodology to verify whether controls are working and worker personal exposures are below the WELs.
- Workers liable to be exposed to be covered by suitable health surveillance.

GS noted that the HSE welcome comments, please (support or otherwise).

CP asked if there were any additional tests that they should be putting in place. GS stated you should work with your occupational health provider in regard to specific monitoring or tests should be in place, for allergens, exposure to allergenic dust, perhaps spirometry if someone has a problem with lung function, and they should be monitored over a certain time with periodic testing. With exposure to diacetyl there can be significant changes and quickly.

CP asked where further guidance could be found in regard to diacetyl testing. GS noted that should be available in the next couple of weeks. CC asked if HSE there was a right of reply, GS noted there was this was just a draft version for discussion with BCA members.

Case study 1

- Flavoured coffee
 - Limited info in the SDS
 - Very high exposures
 - Increasing sector (in UK)

- Case of Bronchiolitis obliterans (2018)
- SDSD supplied issues
- Substitution achieved!

GS noted that sometimes you can have a product that is safe to consume but highly toxic to breathe in.

GS stated if you are a business that is adding liquid flavourings, challenge your suppliers, does it contain diacetyl, if so, is it less than 1%.

CC asked if it was linked to butter, vanilla, butterscotch flavourings, GS confirmed it was. The flavouring manufacturers were looking into substitutes.

CC asked if people who has been involved in the surveillance, were they working with the Laboratories, GS noted they were.

GS noted that they have details for science labs that they would recommend. Details of these are listed on the **www.BOHS.org** website, always contact more than one supplier.

GS added **MFOH or LFOH** qualifications that you are looking for.

Latest developments & concerns

- Sampling & analysis
 - Incorrect selection (LOD>>WEL!)
 - Incorrect conclusions
 - Challenged consultant with response

Control – Coffee Processing

- Enclosure
- Temperature
- Extraction
- Exposure Monitoring
- TExT of Controls
- RPE

HSE always recommend COOL BEFORE GRINDING.

If you have a fast process roasting to packing you will be taking diacetyl with you and more people at the packing end exposed.

If you have a problem protection equipment might well be required, including filters, different extraction methods.

Guidance & Actions

- SDS (flavours)
 - No mention of diacetyl (check for butanedione & pentanedione)
 - Suppliers/importers – reference point 1%
 - CRD (Chemical Regulation Directorate) investigating
- Consultants
 - Qualifications
 - Experience
 - Expertise

Future

- Brewing - the HSE will be looking at craft brewers
 - No sampling to date
 - Concerns

- Sector enquiries on-going

GS noted that the HSE are interested in those companies that are looking at more than 600kgs going through the coffee process each week.

GS asked those companies if they are monitoring carbon monoxide, or monitoring carbon monoxide and diacetyl in parallel. If there is a correlation HSE can use this data as a benchmark (carbon monoxide monitoring being much cheaper than diacetyl). Please contact the HSE directly to assist with this.

CC summarised that in regard to the safety notice do the BCA feedback as a singular reply.

CC asked about HSE horizon scanning, GS noted that they issue normally around March, on their website, as to what they will be looking at / industries they would likely be inspecting in the coming months.

GS noted that companies should sign up to the HSE technical notices, as there might be items that come up that would be of interest.

CC asked if the BCA will circulate the presentation and perhaps arrange a call to discuss approach back to HSE.

Action: BCA to arrange circulation and coordinate comments/feedback, if Members would also like to join in on the call to discuss agreed response back to HSE this will be held on Wednesday 19th June at 10.30a.m.
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- **Chlorate**

MRL revision under Reg EC 396/2005.

As a follow up to ECF document 19TECH34 referring to the dedicated Chlorate Member States (MS) Expert Working Group on MRLs agenda for 13 May, the following informal feedback has been received:

MRLs: a new draft with revised MRLs will be circulated to Member States this week. The draft proposal would be also re-examined by the Commission's legal services. The following limits were discussed (please note that these limits could change when the amended draft is next presented):

- **A baseline limit of 0.05 mg/kg would be applied to all raw commodities**, with the exceptions outlined below:
 - Spinach – new limit 0.3 mg/kg
 - Herbs and edible flowers – new limit 0.3 mg/kg
 - Possibility that all leafy veg will have a new limit of 0.3 mg/kg
- A footnote will be included for fruit juices setting a limit of 0.1 mg/kg on finished product
- A footnote will be included to clarify that for powdered dairy products the MRL of 0.1 mg/kg will apply to reconstituted powder (as consumed)

Enforcement: There was agreement of MS to not enforce levels for commodities for finished products – how to make this legally possible will be checked with the Commission's legal services but for the time being MS were asked not to enforce the MRLs for processed products derived from the raw commodities unless the processed products are specifically mentioned (i.e. fruit juices and milk).

Timeline: The redrafted proposal is to be discussed during the June 2019 SCoPAFF meeting with a vote expected to take place during the September 2019 meeting.

As the ruling is still to be made, we continue to **encourage that you submit chlorate results for soluble coffee to the secretariat, before 6 June**, in order to better understand where we stand in relation to chlorate levels.

- **Heavy Metals & Chemicals**

CS noted that there is nothing in this category at this time.

- **Mineral Hydrocarbons**

CS noted not aware of any enforcement activity at this time, but businesses should be aware and take necessary steps.

- **Pesticides**

Glyphosphate

The best maintained website for worldwide updates and status is Baum Hedlund in the USA

<https://www.baumhedlundlaw.com/toxic-tort-law/monsanto-roundup-lawsuit/where-is-glyphosate-banned/>

Current EU status – potential non-renewal of approval in December 2022.

Various coffee growing countries have or are planning bans including:-

- Vietnam – a major concern for the coffee industry.
- El Salvador – legislation has stalled.
- India - Punjab and Kerala.
- Colombia – banned for aerial application - used on coca plantations. President Duque wants ban lifted.
- Various member states of the EU have invoked bans of sale to consumers.
- The lack of affordable, effective alternatives to glyphosate is a real concern to the coffee industry.

ECF Contaminants group continue to work on analytical methods but the first ring test results suggest that there isn't a major issue with methodology.

Methyl Bromide

Currently banned in the EU but used in some coffee origins. EU has a limit on bromide on imported material and compliance can be achieved through this route.

Mepiquat

A Maillard reaction product and a plant growth retardant. Via the Dutch authorities we are informed that the EU has found Mepiquat in soluble coffee, believed to be present as a result of the processing process. Soluble coffee is to be included in the monitoring of Member States, Members should be aware, the default is 0.1. The Secretariat to follow up for further developments.

6. BRCv7(8) – Food Authenticity

CS noted that the BRC Sub-Committee had received the update.

CC noted that we should have a version number and page numbering on the document.

CC added that on Mapping Supply Chain.....e.g. any, traded, on a

Action: TB to have this amended and document to then be circulated to T&R

7. ISO Activities

Oliver SüBe-Hermann informs that the DIN Coffee WG annual meeting took place in Berlin on the 27th of February. The WG is currently working on: - Determination of Furan and Furan Derivates (2-Methylfuran, 3-Methylfuran, 2,5 Dimethylfuran). The first draft of the standard has been distributed and was adopted, having opened the consultation period with a validation ring test scheduled for the last quarter of 2019. Participants are highly welcome even if not member of the board. - Determination of mineral oil (MOSH/MOAH) in coffee. The First comparisons on contaminated green coffee samples have been conducted in a subgroup. Beyond the basic screening method by LC-

GC-FID the necessity of an additional analysis by GC-MS in case of positive findings was discussed by the WG in order to characterize the nature of the contamination. - Analysis of Glyphosate in coffee. The board is hesitant as they believe a vertical method for one active substance in one commodity may not be the right approach in modern pesticide analysis. The board is hesitant because they think a vertical method for one active substance in one commodity may not be the right approach in modern pesticide analysis. They will further look into the CVUA Stuttgart method. - Analysis of 16-O Methylcafestol. Project for normalization of the analysis of 16 –OMC by Nuclear Molecular Resonanz (NMR) is proposed by the BVL members of the board. Publishing as BVL (LFGB § 64) method and DIN standard is planned. At the same time the DIN 10779 (HPLC method for 16-OMC) shall be modernized and simplified to bring both methods forward to the DIN / CEN working groups on food authenticity - Set up of a new DIN working group on "Food Authenticity" as a national mirror committee to the also new CEN TC 460 "Food Authenticity". It was agreed to forward the 16-OMC method(s) to the CEN TC 460 working group and create a subgroup for coffee in CEN dealing with coffee standards for food authenticity. No other standards for coffee, beyond the ones already established, like the sugar spectrum in soluble coffee according to "AFCASOLE" (ISO 24114 / ISO 11292), are in the scope. - State of play adoption of ISO 18862 (Acrylamide in coffee). prEN ISO 18862 Enquiry is finished. 14 approvals versus 2 non-approvals (Austria and Sweden). Overall the share of votes in favour would be sufficient for adopting the standard. However there had been additional comments received by aforesaid countries. Now the WG 13 secretariat is obliged to clarify with the CEN TC 275, whether the standard can nevertheless be taken over.

NB noted that on the 6th June, TB had circulated for comment, ISO/CD 23134 – Coffee and Coffee product – Determination of particle size of ground roasted coffee – Horizontal sieving motion method – using circular brushes. CS noted that he felt no action was required on this, but appreciated Members thoughts.

Action: ALL

Also, on the 6th June, TB circulated ISO/TC34/SC15 N2241 ISO/NWIP 24386 Coffee – Determination of caffeine content. CS noted that there is a push from a specific country for an alternative to hplc determination for caffeine, as you know the established hplc method is used industry wide and has been adopted in most growing countries.

Action: ALL

Action: NB asked TB to re-circulate as some Members may have missed

8. Sustainability and Foot Printing

• Regulatory

No regulatory developments. The BCA did submit its response to the Waste & Recycling consultations.

9. Health Claims

• Caffeine Claims

No change to this.

10. Consumer Information Legislation

• Rules of Origin

As you may be aware, Ms. Alexandra Nikolakopoulou, Head of Unit DG Santé E1, *Food Information and Composition, Food Waste*, joined us during our T&R Meeting last week. Ms. Nikolakopoulou, was co-author and accountable for the preparation, negotiation and adoption of Regulation (EU) No 1169/2011 of the European Parliament and of the Council on the provision of Food Information to Consumers. Today, among other things, she is responsible for the preparation and adoption of delegated acts and actions pertaining to the aforementioned Regulation. Her unit is thus working on the implementation of Article 26 (3) of Regulation 1169/2011, and discussing the definition of Primary Ingredient.

The issue of concern is that the way the current Q&A is drafted (enclosed), Single ingredients would fall under the scope of Art. 26 (3), contrary to the understanding of ECF and FoodDrinkEurope. Falling under the scope of Article 26 (3) would imply that where the country of origin or the place of provenance of a food is given and where it is not the same as that of its primary ingredient, the

country of origin or place of provenance of the primary ingredient in question is also to be given, or at least, indicated as being different o that of the food. Please note that labelling would NOT be mandatory where the country of origin of the food is NOT given.

ECF's continues to advocate against single ingredients falling under the scope of Art. 26 (3). We personally shared our views with Ms. Nikolakopoulou during the T&R meeting and have followed up with the herewith argumentation. FoodDrinkEurope will also provide feedback to the Q&A, fully aligned with our position.

The next European Commission Expert Group shall be meeting on the 8th of April, encouraging that you continue to share your views with your national representatives.

Please find below the line of argumentation that was used with the European Commission and FoodDrinkEurope.

STARTING POINT

ECF welcomed the conclusions outlined in the Commission Report COM (2015) 204 final published on 20 May 2015, regarding the mandatory indication of the country of origin or place of provenance for unprocessed foods, single ingredient products and ingredients that represent more than 50% of a food. "...**voluntary origin labelling** combined with the already existing mandatory origin labelling regimes for specific foods or categories of food appears as the **suitable option**. It maintains selling prices at current levels and still allows consumers to choose products with specific origins if they wish to, while it does not impact the internal market and international trade."

Article 26 (3) of the Regulation requires that where the country of origin or the place of provenance of a food is given and where it is not the same as that of its primary ingredient, the country of origin or place of provenance of the primary ingredient in question is also to be given, or at least, indicated as being different o that of the food.

REASONING for considering that single ingredients fall out of the scope of Article 26 (3).

1. In the particular case of a single ingredient products, such as coffee, **the single ingredient is coinciding with the food itself**. This would be the reason why in Art. 19 single ingredients are exempted of having an ingredient list as the name of the food is identical to the ingredient name. As the single ingredient is coinciding with the food itself, **it follows that the place of provenance/country of origin of the single ingredient cannot differ from that of the food**. Therefore, the Implementing Regulation would not be relevant to foods consisting of a single ingredient, such as coffee. We also would like to note that when referring to question 3.4, in the latest Draft Commission Notice on the application of the provisions of Article 26(3) of Regulation (EU) No 1169/2011, that we have had access to, it would not be correct to refer to 'raw material', as Article 26 (3) applies to the 'ingredient' of the food.
2. If it is possible that the application of the definition of the primary ingredient will result in NO primary ingredient in a food with an ingredient representing over 50% of that food, it follows that a single ingredient is not a primary ingredient either. Thus, the Implementing Regulation would not be relevant either.
3. If we take into consideration that consumers are knowledgeable that coffee, as other exotic commodities, is NOT grown in the EU, labelling of the provenance of the green coffee would be of little informative value. Furthermore, because of the changing composition of the blend, most consumers are interested in the brand that delivers their preferred taste on a consistent basis and not how this blend is composed. Following up on this line of argumentation and taking into consideration the Principle of Proportionality from the European Union Law, there would be no need for a Regulation.

Nevertheless, in cases where a single ingredient product bears an origin indication which could mislead the consumer as to the true origin or provenance of the food, Article 26(2)(a) would apply.

ADDITIONAL INFORMATION

Additionally, we would like to share the complexity that lies behind the labelling of the countries of provenance of the green (unroasted) coffee.

- **Hampers the flexibility to deviate the sourcing of raw material.** Around 95% of roasted and soluble coffee is a blend from a number of producing countries from outside the EU. Blend changes are frequent according to availability and price/quality relationship of the green coffee, and aim to provide the consumer with a consistent flavour profile. Labelling such frequent changes is not feasible.
- **Requires radically adapting or abandoning the continuous production process.** The flow of the raw material resembles a continuous process, where blending is a key step. The requirement of having to constantly tailor packaging labels to the place of provenance of the green coffee will interfere with the production line in such a way that the production process would lose its continuous nature.
- **Increases the environmental footprint of coffee products.** The forced segregation of the provenance of green coffee will increase the environmental impact, food and packaging waste will be generated whenever the production process is interrupted and energy use will increase if the process has to be duplicated in additional production lines or if additional cleaning is needed to change origins.
- **Affects international trade.** If labelling of the blend composition were to become mandatory, manufacturers might choose to print labels with their top-volume raw material sources. This would affect smaller coffee producing countries who stand to lose a significant share of their exports, whilst consumers are not provided with the best possible blend composition and price/quality relationship.
- **Provides little informative value for consumers.** Given the changing composition of the blend, most consumers are interested in the brand that delivers his preferred taste on a consistent basis, not how this blend is composed. Those consumers interested to buy single-origin coffee or coffee from a specific region or farm are already served through voluntary indication of provenance.

CC asked what is the significance, if you make a claim, you need to define what is actually in the product. CS and JB you should definitely not use imagery donating a specific country if you are using a blend.

- **Labelling (Brexit)**

If and when we leave the EU the UK will become a third country and will be required to label accordingly. A transition period is proposed to allow manufacturers to introduced modified labels.

11. Technical & Regulatory Priorities

CS noted that this document was updated in April, does anyone feel that needs updating further at this time?

CC added perhaps some further insight on what the HSE had presented be added.

Action: CS

12. Position Statements

CS noted that in regard to anything in the regulatory sphere there have been no updates to position statements.

13. Date of the next 2019 Technical meeting

- Remaining Date for 2019, please can we ask that you put this date in your diaries.
 - **Tuesday 25th June 2019 – Conference Call**
 - **Wednesday 6th November 2019 - FDF**