



**BRITISH COFFEE
ASSOCIATION**

Sustainability Committee Meeting

15th Nov 2022



Agenda:

Enviroscore Labelling Update

Deforestation - UK & EU

Priorities List

ECF Activities



Deforestation – UK & EU

- EU proposals and concerns remain largely unchanged
- Focus remains on geo-location
- European space agency pilot project with ECF to look at traceability deliverability
- EP broadened scope of draft legislation, wider due diligence and income aspects
- UK – no new developments, waiting on Defra next steps, timeline unclear

EnviroScore Labelling

- IGD project – harmonised UK scheme
- Currently 4 main indicators
 - Climate Change, Water Use, Water quality & Land Use
- **Virtual Reality trials:** results due by end of year.
- **Back-end data:** mapping out the end-to-end process needed to generate product scores.
Recognise number of projects looking at data – where are the gaps?
- **Methodology:** Sessions with Anthesis and World Resources Institute (WRI) to help inform the draft methodology – to be completed by the end of the year.
- **Stakeholder engagement:** Meetings held with FDF members. Areas of concern remain
 - Harmonised data approach
 - Review on-product information and provide access to online information
 - Avoid trade barriers – e.g. EU and NI
 - Avoid discrimination of products and/or supply chains

Corporate Sustainability Due Diligence

- Proposal for an EU Directive on Corporate Sustainability Due Diligence published February 2022
- Aim to foster sustainable and responsible corporate behaviour throughout global value chains
- Obligations regarding actual and potential human rights and environmental adverse impacts with respect to their companies' own operations
- Scope is EU and non-EU companies
- Companies with more than 500 employees and a net turnover 150 million EUR (Group 1)
- Companies with more than 250 employees and a turnover 40 million EUR (Group 2) only if at least half of their turnover stems from engaging in a sector considered 'high risk' - manufacturers of food products are highlighted as one of the 'high risk' sectors)
- SMEs are not directly in the scope of the directive, but probable indirect effects
- Accompanying measures – support will be given to companies to develop relevant websites, platforms or portals as well as development of model contract clauses & help in 3rd countries
- Application – will apply 2 years after entry into force (Group 1) and 4 years after entry into force (Group 2)

Proposal for regulation prohibiting products made with forced labour

- Published 14th September 2022
- EU does not believe existing Due Diligence initiatives address the products themselves – but rather target economic operators and their supply chains
- Scope of this regulation would cover all products made in EU for domestic consumption, exports and all imported goods
- Specific companies/ industries would not be targeted. Scope covers all products, namely those made in the EU for domestic
- Would be in line with the Convention on Forced Labour of the International Labour Organisation, including forced child labour and other recognized standards
- Products would be withdrawn from EU market if found to not comply
- Would apply 2 years after coming into force (could be 2025)

Packaging Waste & EPR

- Tonnage & price reporting PRNs/PERNs
 - Voluntary accreditation but mandatory monthly reporting for reprocessing and export tonnage for those wanting to issue PRNs/PERNs
 - For materials in scope of DRS obligation to continue with PRN/PERNs is only until DRS become operation in country (therefore different timelines across UK)
 - Hence, no double obligations on DRS materials
- EPR – Political scene delays further implementation development
 - Joint industry letter issued – no meetings until response received
 - Seeking to escalate issues, including scheme ownership/operation
 - EFRA Cte wants EPR for all businesses by 2030
 - & ringfence income for recycling infrastructure & research

Packaging Waste and Single Serve Units

- **Definition of packaging?**
- **EPR implications and double counting/ charging**
- **Compostable only capsules?**