



**BRITISH COFFEE  
ASSOCIATION**

## Technical & Regulatory Committee Meeting

23rd November 2022



## Glyphosate Situation:

- EU Glyphosate re-registration to be delayed - 2024?
  - Does this also push back MRL review??
  - Any delay helps with timetable for import tolerance work
- ECF/ISIC looking at processing study for coffee
- UK post Brexit review date by Dec 2025 – specific evaluation
- HSE looking to review MRL's – Dec deadline for submission
- HSE to look at EU MRL's and consider consumer risk assessment
- UK focus on avoiding trade implications – retain current MRL??

# Contaminants

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- **Ochratoxin A**
  - New ECF Guidelines Document published in February
  - EU proposed changes now confirmed for 1<sup>st</sup> January 2023 – 3ppb for roasted and 5ppb for soluble
  - Product on market prior to 1<sup>st</sup> Jan ok until expiry date
  - Reminder – not an FSA first priority
  - Lack of mitigation – waste of a safe product



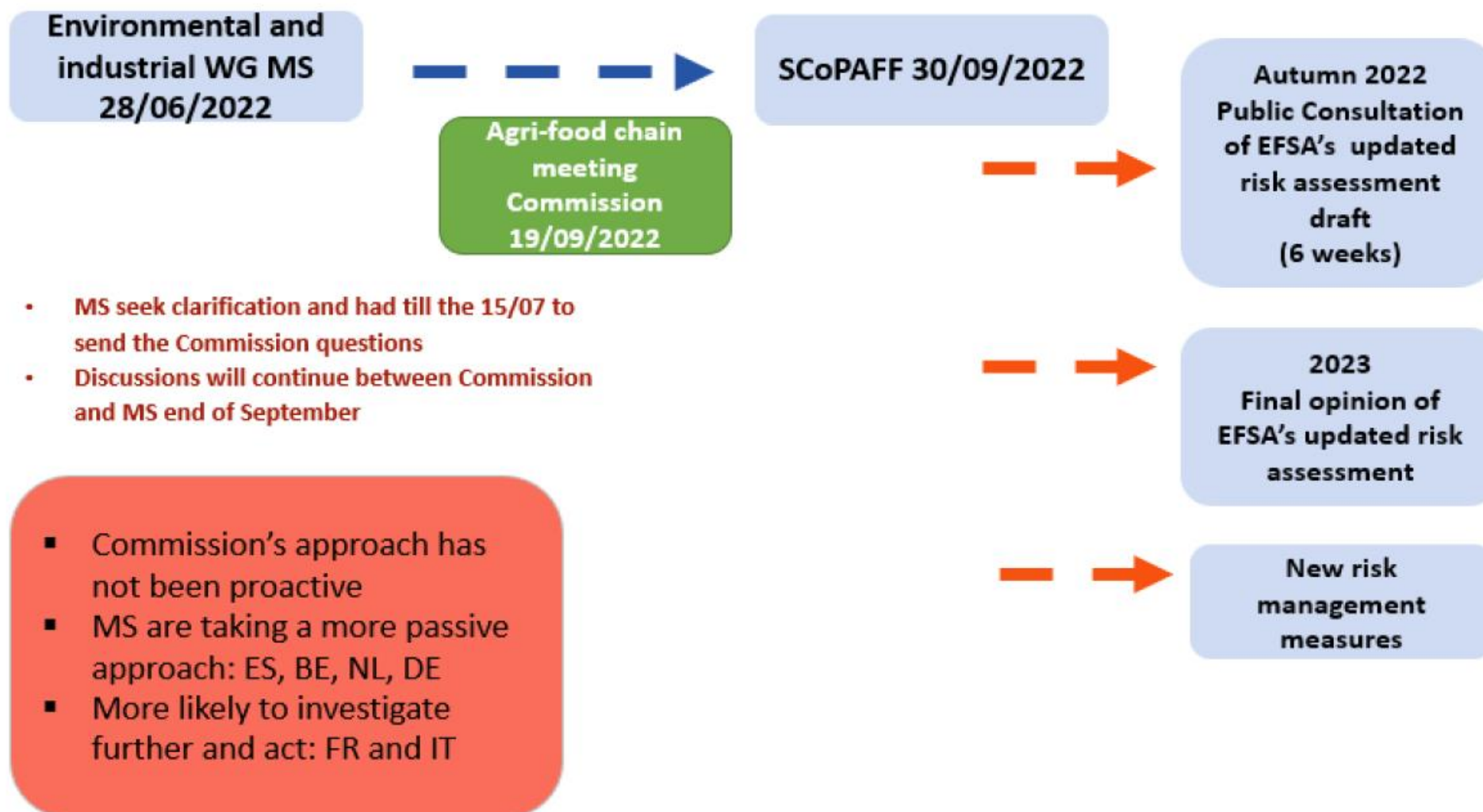
Guidelines for  
the prevention of  
OTA occurrence in  
coffee

February 2022

## Contaminants

- **Acrylamide**
  - Continued debate on Benchmark vs Maximum Levels
  - Estimates of 30,000 tonnes to be destroyed if EU moves to MLs
  - Latest data shows some reduction in soluble coffee exceedances – a change or just reflecting more targeted testing at commercial level?
  - Further SCoPAFF discussions on 24<sup>th</sup> November
- Current state of FSA priority review process
  - Acrylamide to follow T2/HT2 in priority
  - FSA survey results imminent
  - Importance of data reinforced

# MINO, Timeline



# MINO, What has been done so far?

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**2018.** CONTAM makes an internal call for data

**2019.** A Van Heyst et al, 2019 article 'Dietary exposure of the Belgian population to mineral oil' published on-line in Food Addit Contam Part A

**2020.** ECF call for data. Traces of MINO are identified in the green (MOSH & MOAH), roasted (MOSH & MOAH) and Beverage (MOSH)

## 2021

- 40 of-the-shelf samples from 8 countries are analyzed by the Kirchhoff Institute
  - 9 samples are free of MINO
  - 31 samples are MOSH positive (97% of roasted coffee samples). Values not of concern, contamination by POSH
  - 4 samples are MOAH positive. The origin of the contamination is believed to be the mineral oil based batching oil for spinning of jute fibres contaminating the green coffee beans during transport.
- ECF requests EFSA to share any data they might have for Coffee

## 2022

- After a year, EFSA shares 1 sample! (12 datapoints)
- Meetings with Jute Bag manufacturers
- Follow FDE MINO WG
- Attended ECA webinar

## *ESCC Article 5 - Packing*

### (a) Coffee in Bags:

The coffee shall be packed in **sound uniform natural fibre bags suitable for the transport of coffee**, i.e. sound bags which are in external good order, woven from natural fibres, of sufficient strength to withstand transit and storage, previously unused, clean, **suitable for food contact use** and suitable to be packed in a 20' general purpose container

(d) **Any packing material shall be in conformity with the legal requirements for food packaging materials** and waste management within the European Union valid at the time of conclusion of the contract

# MINO, Cocoa Sector

**Project: Main Sources of MOH contamination and entry points into the cocoa supply chain**

**Goal: better understand the possible sources of contamination and entry points of MOH in the cocoa supply chain and the reliability of the analytical methods.**

- **Entry points:** Storage in origin and container transport to the final destination
- **Contamination sources:** A lab-scale test, where cocoa beans were exposed to contaminated jute bags
- **Reliability of the analytical methods:** three ring tests were organized



# MINO, Open questions for coffee

- **Origin:** internal transport & storage
- **Overseas transport:** How much coffee is delivered in Jute BAGS vs big bags vs bulk stuffed containers? – ECF LC?
- Contact time? Temperature?
- Migration? With a higher incidence of the lighter C-fractions?
- Special focus: Africa? (West Africa for Cocoa)
- Scientific evidence, transfer into the brew?



# ECF, Environmental Factors

## **Regulation on the Sustainable Use of Plant Protection Products**

22/06/22. EC proposal for a new Regulation including EU wide targets to reduce by 50% the use and risk of chemical pesticides by 2030, in line with the EU's F2F and Biodiversity strategies

- **Legally binding targets at EU level** to reduce by 50% the use and the risk of chemical pesticides as well as the use of the more hazardous pesticides by 2030.
- **Global environmental considerations** to be taken into account when deciding on MRLs in food to *encourage third countries to also limit or prohibit the use of these pesticides, already banned in the EU.*
- Draft Commission Regulation amending Annexes II and V to Regulation (EC) No 396/2005 as regards MRL for **clothianidin and thiamethoxam**
- **06/07/22. WTO communication.** First practical example of the implications of the proposal, MRL reduction to the LOD due to environmental factors (pollinators).
- Thiamethoxam MRL from 0.2 mg/kg to 0.05 mg/kg
- Clothianidin MRL remains at 0.05 mg/kg

MRLs – trading standards, not a tool for addressing environmental challenges in other countries

## ECF – Single Serve Units

### Leaked proposal to review existing Packaging Waste Directive

- The proposal only covers: *empty after use capsules, coffee foil pouches and filter coffee pods*
  - NOT empty after use capsules are not covered, referring to 'regular' plastic and aluminium SSU
  - Compostable packaging is ONLY mandated for filter coffee pods
  - If at any point 'regular' plastic and aluminium SSU were to be considered as packaging, it would appear that they would not have the option of being compostable
  - This is a proposal from the EC. The EP and the Council could suggest that ALL SSU are covered by the legislation and agree to make the request to the EC
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- **Option 1: Request that ALL SSU (recyclable & compostable) are considered as PACKAGING with a DELAY in the implementation of the EPR fee**
  - **Option 2: Request that ONLY recyclable SSU are considered as PACKAGING with a DELAY in the implementation of the EPR fee**
  - **Option 3: Request that ALL SSU are NOT considered as PACKAGING, UNTIL there is sorting and recycling infrastructure in place**

## ECF – Dual Quality

### **Dual Quality.**

- ❖ Branded goods sold in some Member States considered inferior in quality compared to same product sold in others
- ❖ Generally seen as a difference between ‘new’ Member States and ‘old’
- ❖ Situation confirmed by JRC through harmonized testing methodology
- ❖ 2019 EU Directive (2019/2161) brings in enforcement and enhanced consumer protection rules
- ❖ JRC introduced, in 2018, framework for selection and testing of food products
- ❖ Coffee products included in annual JRC monitoring