

BCA Technical & Regulatory Priorities & Risk Register (Updated June 2024)		
Rating 1 – Urgent Action/Implications to Address (Are Communications Media Work (Comms) or Technical Approach (Tech) or Both Required. Rating 2 – On Radar, Medium to Short Term Deadlines/Implications to Address Marked with Comms or Tech as above. Rating 3 – No Immediate Implications/Actions - Watching Brief		
Issue	Current Status	Next Steps / Actions
Contaminants		
Acrylamide	Regulation came into force on the 11th of April 2018	No Action Required
	The ECF draft Toolbox has been circulated. FDE toolbox published. Maximum limits are under consideration for some food categories.	ECF CoP adopted by the BCA and issued to Members in June 2019.
	The FSA 2018 Acrylamide & Furan Monitoring Survey was published in October 2019. The acrylamide and furans results obtained in this sampling year do not increase their concern about the risk to human health.	No Action Required
	FSA due to publish a data call for Acrylamide in second half of 2024	Members to submit data to FSA call
Furan	EFSA opinion on furan publish October 2017. Concerns raised over methyl furan. FDE seeking to publish a paper in a recognised scientific journal. This should be referenced in the second EFSA opinion paper which is expected to address methyl furans.	No Action Required – updates on ECF activities to be provided to Members as they become available
	ISIC paper on furan exposure from coffee consumption published.	No Action Required

	The FSA 2018 Acrylamide & Furan Monitoring Survey was published in October 2019. The acrylamide and furans results obtained in this sampling year do not increase their concern about the risk to human health. EU continuing to look at Furan levels in coffee, potential for further actions in late 2024	No Action Required Continue to monitor possible EU developments
Mineral Oils	Increasing focus on the use of Mineral Oils in food & drink packaging with France introducing a ban from 2025 and revision of Consumer Goods Ordinance in Germany to require 'functional barrier' to prevent MOAH transfer. FSA has MOH's on its red list for action.	Monitor for regulatory action, feed any available data to FSA.
	Focus on the use of mineral oils in the manufacture of jute bags and the potential for transfer from bag to coffee bean during transport/storage ECF survey data shows general low levels (6% roasted samples above LoQ in period 2017-23; 2% in green samples over same period)	Investigate available information on potential for transfer and relay additional findings from ECF work to members as it becomes available
Food Law		
Caffeine Related Health Claims	EP rejected the authorisation of the four health claims in July 2016. Claims remain on hold.	No Action Required
	Commission and MSs prepared to re-draft legislation but no concrete action to date.	No Action Required

Occupational Safety		
Diacetyl	Diacetyl added to EH40/2005 – workplace exposure limits in June 2018.	
	HSE published Safety Notice relating to Diacetyl in January 2023, giving guidance on risk assessment for coffee businesses	BCA notified members of HSE alert. BCA Position Paper for internal use circulated June 2024.
Dichloromethane (DCM)	ECHA proposing re-classification of DCM due to concerns over operator exposure in its use as a solvent. Coffee not highlighted because of its closed environment use	Await determination of re-classification decision and ECF's engagement with European Solvents Association who have the necessary technical data to challenge re-classification. ECHA report expected Feb '25
Pesticides		
Glyphosate	EU re-registration of Glyphosate completed in December 2023. Glyphosate now authorised in EU until 15 December 2033. Position regarding ongoing EU review of Glyphosate MRLs currently unclear. Original proposals sought a reduction from 0.1mg/kg to 0.05mg/kg. Trials underway in Brazil to provide evidence for import tolerance. Year 1 data now available but trials not concluding until later in 2024. UK MRL review required information from manufacturers by end 2022, no information on outcome of process to date	Continues to be unclear whether UK would follow any EU MRL reduction, therefore continue to engage with Bayer on UK process and engage with PSD via FDF Contaminants Committee. Need for data monitoring to understand potential scale of issue for imports if MRL reduced and no import tolerance available to be followed up with members for their involvement
Ethylene Oxide	Increasing concern in supply chain at presence of Ethylene Oxide across range of products, including coffee and predominantly from India.	No action at present.