



CBI Tailored market intelligence: Compliance with buyer requirements for specialty coffee

A buyer requirement refers to all demands you can expect from your potential buyers. Requirements from buyers can be separated into three areas: legislative, non-legislative/contractual, and additional requirements. When exporting specialty coffee to the EU, it is important to comply with EU legislation as well as with non-formal legislative contractual requirements. To differentiate your product on the market you sometimes need to go beyond legislative and business requirements. For Specialty coffees, the superior quality of the products and traceability are the most relevant contractual and additional requirements.

Legislative requirements

Legislative requirements are the minimum requirements which must be fulfilled by products exported to and marketed in the EU, and they are defined by the EU and member states' laws. Those products which do not meet these requirements are considered as unsafe for human consumption and therefore are not allowed to enter the EU market.

EU legislative requirements emphasize:

- (1) Hygiene, and the responsibility of food business operators to guarantee hygiene throughout the whole value chain.
- (2) Traceability.
- (3) Food safety including the use of pesticides.

The final responsibility for ensuring that the products entering the EU market comply with legislation and food safety lies directly with the EU importer. That is one of the reasons why you must understand and guarantee the fulfilment of all buyer requirements.

Codex Alimentarius Commission (CAC)

At international level it is important to mention that all Member States of the European Union (EU), and since 2003 the European Community, are members of the Codex Alimentarius Commission, the body in charge of updating the Codex. One of the primary missions of the Codex Alimentarius Commission (CAC) is to protect the health of consumers and ensure fair practices in international food trade, in particular by laying down standards set out in the Codex Alimentarius (Codex). The accession of the European Community helped improve consistency between the standards, guidelines and recommendations adopted under the Codex and other relevant international obligations binding the European Community and its Member States in the area of food standards.

The measures taken by the EU with regard to food safety and food often refer to the Codex and particularly to the HACCP (Hazard Analysis and Critical Control Point) principles, which are the basis of European legislation relating to [food hygiene](#) and official controls on products intended for human consumption.

Sanitary and Phytosanitary Measures (SPS), and Technical Barriers to Trade (TBT)

Another element related with EU legislation and international obligations is the relationship between the World Trade Organization (WTO) and the Codex Alimentarius. Two specific agreements were concluded when the WTO met the CAC. One is the Agreement on Sanitary and Phytosanitary Measures (SPS Agreement) which lays down the conditions which a State can adopt and carry out health measures (animal health, food safety) or phytosanitary measures (protection of plants) that have a direct or indirect impact on international trade, with explicit reference to the standards defined by the Codex.

The second is the Agreement on Technical Barriers to Trade (TBT Agreement) which aims to guarantee that technical regulations and standards do not create unnecessary obstacles to international trade.

In the case of green coffee, the majority of TBT or SPS notifications from importing countries are related to risks associated with pesticides, chemical residues, food safety and protection of plants against pests and diseases. When the new rules and regulations contained in the notifications of SPS and TBT agreements go beyond the requirements needed, the coffee producers' costs may become excessively high, and therefore generate a negative effect on trade. On the other hand, if compliance requirements are met, it may be possible to increase trade.

Food safety and Maximum Residue Levels (MRLs) of pesticides

In the EU, any substance or product - whether processed, partially processed or unprocessed - which is intended to be ingested by humans must comply with the General Food Law ([Regulation \(EC\) 178/2002](#)), which lays down the general principles and requirements of food legislation and procedures in matters of food safety. Article 18 includes provisions on the traceability of food and Article 19 on the responsibilities for food business operators.

EU legislation establishes the Maximum Residue Levels (MRLs) of pesticides permitted in foodstuff intended for human consumption. MRLs are relevant to coffee. The International Coffee Council issued a report in March 2013 containing information on the MRL of 21 pesticides applicable to coffee and covered by the Codex Alimentarius. The document can be found here: [ICO Maximum Residue Limits for Coffee](#).

For more information also check the related document: [CBI EU Legislation: MRLs of Pesticides in Food](#).

Special attention should be paid to the reduction and prevention of Ochratoxin (OTA) contamination in coffee. In recognition of this global concern, the FAO developed the Guidelines for the Prevention of Mould Formation in Coffee (2006), to enable coffee-producing countries to develop and implement their own national programmes for the prevention and reduction of OTA contamination. See document at: [FAO Coffee Guidelines](#).

The *Codex Alimentarius* adopted a Code of Practice ([CAC/RCP 69-2009](#)) for the prevention and reduction of Ochratoxin in coffee. This code establishes recommended practices and measures for the prevention and reduction of OTA contamination from pre-harvest to transportation and shipping. The document is available at: [Codex Alimentarius](#)

The European Coffee Federation also worked on guidelines for OTA risk management for green coffee buying, and Quality Control for OTA management. The documents are available at: [European Coffee Federation](#)

Other requirements presented in the guidelines cover food ingredients generally, addressing issues such as microbiological contamination, contaminants, nutritional properties, labelling and general marketing aspects.

For requirements on export documents for shipment to the EU, the latest updates on legislation, tariffs, please follow this link: [EU Export Helpdesk](#).

Summary

Although there are some differences in national legislation in individual member states, the EU legislation which we have discussed above forms the basis for legal requirements in the 28 EU members. This information is listed in Table 1 below. For information on the sector and other relevant national legislation, check the related documents here: [CBI Coffee, Tea and Cocoa Buyer Requirements](#).

Table 1: EU's legal requirements for coffee

Legislation	Description	Source	Links
General European Food Law	The EU General Food Law is the framework regulation for food safety legislation. The legislation also includes requirements on traceability and responsibility, relevant for coffee.	Regulation (EC) 178/2002	EU Legislation EU legislation: General Food Law
Maximum Residue Levels (MRLs) of pesticides in food	EU legislation has set maximum residue levels (MRLs) of pesticides in food products.	Regulation (EC) 396/2005 Regulation (EC) 178/2006	EU legislation: Maximum Residue Levels (MRLs) of pesticides in food
Contaminants in food	The EU food safety policy has laid down legislation that regulates maximum levels for certain contaminants in specified products or product groups.	Regulation (EC) 1881/2006	EU legislation: Contaminants in food
Food contact materials	The EU has laid down strict requirements aiming to avoid dangerous substances used in the manufacture of food contact materials being transferred to food. The requirements on packaging material are relevant for coffee.	Regulation (EC) 1935/2004 Directive 84/500/EEC Directive 2007/42/EEC Directive 2002/72 EC Regulation (EC) 282/2008 Regulation (EC) 372/2007 Directive 78/142/EEC Directive 93/11/EEC Regulation (EC) 1895/2005 Directive 2008/39/EC	EU legislation: Food contact materials
Food control	All food imported into the EU is subject to official controls (documentary, identity and physical) which are important to know about beforehand. Failure to follow the requirements and procedures could damage the reputation and finances of business operators.	Regulation (EC) 882/2004 Regulation (EC) 669/2009	EU legislation: Food control
Food labelling	This Directive and Regulations provide an overview of the legislation on general food labelling requirements applicable to all foodstuffs. The requirements are related to all pre-packaged food products marketed in the EU. There are also some specific labelling requirements for specific food products (e.g. coffee).	Directive 2000/13/EC Directive 90/496/EC Regulation 1924/2006/EC Directive 2005/26/EC Directive 2007/68/EC	EU legislation: Food labelling
Good manufacturing practice (GMP) for food contact materials	The EU Good Manufacturing Practice (GMP) is obligatory for manufacturers of materials and articles within the EU. It is not directly applicable to producers outside the EU. However, it may be indirectly relevant because buyers' demands for a quality system may give competitive advantage to those complying with GMP.	Regulation (EC) 2023/2006	EU legislation: Good manufacturing practice (GMP) for food contact materials
Hygiene of food (HACCP)	The EU legislation on Hygiene of food (HACCP) is legally binding for food processors, and might be recommended to some extent for coffee farmers, even though it is not considered as legal requirement for exporters of green coffee.	Regulation (EC) 853/2004	EU legislation: Hygiene of food (HACCP)

Microbiological contamination of food	This document provides an overview of the microbiological criteria for food products that fall within the scope of the CBI sectors . It also includes recommendations on how to prevent the presence of micro-organisms in food products, and other relevant information.	Regulation (EC) 2073/2005	EU legislation: Microbiological contamination of food
Organic production and labelling	This document provides steps to be followed by exporters in developing countries to ensure compliance with the organic requirements as well as providing practical tools and information.	Regulation (EC) 834/2007	EU legislation: Organic production and labelling
		Regulation (EC) 889/2008	
		Regulation (EC) 1235/2008	

Non-legislative requirements

Non-legislative requirements are all those contractual requirements that are not laid down by law but are set up for compliance with the law and the practices in the sector. These contractual formats have been developed by the coffee trade as general agreements on the basic conditions, in which the seller and buyer agree on issues such as quality, quantity, price, shipment period and sale conditions.

Contracts

The coffee trade industry has developed a number of standard forms of contract, of which the most frequently used are those issued by the European Coffee Federation ([ECF - 04.04.02](#)) in Amsterdam and the Green Coffee Association ([GCA - 04.04.03](#)) of New York.

Many individual coffee transaction details are agreed before a written contract is concluded or confirmed. However the basic conditions of sale generally conform to the standard form of contract. For more information see [The Coffee Guide](#).

Quality standards

The following are some examples of buyer requirements that are subject to standard or particular demands, and are usually present in coffee export activities:

Quality standards for exporting green coffee: labelling "S" in Certificate of Origin

In 2004 [the International Coffee Organization](#) approved the recommendations for a Coffee Quality Programme based on voluntary targets for minimum quality export standards. The ICO adopts quality standards for exported coffee that must be met for the coffee to be labelled as "S" coffee on the ICO Certificate of Origin.

The quality standard refers to the number of defects and moisture content for Arabica and Robusta. See [resolution 420](#) for more information. Specialty coffees which are described in this Resolution may be marked "S" together with their specific grade nomenclature, even if they do not meet the target moisture standard.

Quality and Safety standards for exporting roasted coffee: ISO and HACCP

When exporting roasted coffee beans, some buyers might require Ugandan coffee exporters to comply with quality management systems and/or food safety management systems, usually described in [ISO 9001](#) or [ISO 22000](#), including hazard analysis and critical control points (HACCP) practices. HACCP is not a legal requirement for green coffee. The Organisation for Standardisation (ISO) also provides [specific standards](#) on green coffee quality used for roasting, such as [ISO 10470](#) which has a defect reference chart for green coffee, and [ISO 4149](#) which specifies methods for the olfactory and visual examination of green coffee.

GMP and HACCP plans could be required if exporters work with larger customers such as supermarkets, food services and restaurants. For small roasters, this will probably become another important element of differentiation.

EU food operators are obliged to implement HACCP systems based on current legislation ([Council Directive 93/43/EEC on the hygiene of foodstuffs](#)). Their suppliers are increasingly being demanded to comply with these safety regulations, which are subject to verification by food safety authorities.

The [ITC Coffee Guide](#) provides information and advice on quality control and food safety for coffee.

Quality in contracts: on description, or subject to approval of samples

As an exporter, it is important to understand the terms and descriptions generally used in the coffee trade. You must be prepared to negotiate on quality and specify in descriptions or on a sample basis.

The ICO has produced a glossary of selected terms relating to the operation of the International Coffee Agreements. See more at: [Glossary of terms used in coffee](#). The European Coffee Federation also provides definitions and a glossary for coffee contracts and quality descriptions that are basic requirements for buyers. You can see those documents at: [European Contract for Coffee](#).

In general, trade in Robusta is largely based on description, while quality Arabica is traded on a sample basis. However, it can also depend on the quality requirements of the buyers as well as the quality segmentation of the coffees: exemplary quality, high quality (specialty), mainstream (commercial) quality or low grade.

For specialty or high quality coffees, there is generally a combination of description and approval of samples, due to the various aspects that differentiate the coffee, both nationally and internationally.

Traceability

Traceability refers to the ability to trace, follow and record all the parts of the supply chain for coffee. This has become an increasingly important buyer requirement since the General Food Law came into force. Particularly in the coffee and specialty coffee sector, traceability is becoming an essential aspect not only for food safety but as a marketing tool. From bean to cup, buyers are eager to trace and show to their customers that their specialty coffee lots are fully identifiable, and correspond closely to the characteristics, origin and quality which are described.

In the incorporation of coffee standards and certification, traceability is the most important aspect of conformity. [Utz certification](#) was the first standard after [Organic](#) to implement a full system of traceability for coffee. Nowadays, more complex requirements such as record keeping, traceability and good agricultural practices are commonly shared among the different certification systems. More information can be found at: [CBI Traceability of Food](#).

Packaging: standard jute bags or bulk

Coffee must be packed in sound uniform natural fibre bags, suitable for export and conforming to the EU's legal requirements for food packaging materials and waste management. Exporters need to know what types and quality of bags are acceptable, not only in the European Union but also in other countries. Due to the different requirements of buyers, it is advisable for exporters to ensure that the packaging is acceptable for their potential customers beforehand.

Table 2 : Indicative weight bags

Kg /bag	Coffee origin
45.63	Hawaii, Puerto Rico
50	Yemen, India (e.g. Monsooned Malabar)
59.88	Swiss Water Decaf
60	Africa (Uganda) Brazil, Indonesia, Panama, Vietnam, most other decafs
69	Most Central & South America (e.g. Nicaragua, El Salvador)
70	Colombia

European coffee importers want to have the product delivered mostly in new uniform bags of woven natural materials (e.g. jute or sisal), in order to allow free air circulation. The net weight of the bags depends on the country of origin. Generally they weigh 60kg but can be 69kg in Central and South America. See Table 2 of Indicative weight opposite.

Bulk coffee should be in a bulk container liner. Depending on the contract, the so-called super sacks (jumbo bags) made of synthetic fibre may also be used. All forms of packaging must conform to food grade packaging standards in the country of destination.

Figure 1: Specialty coffee bags

Some specialty coffee exporters ship with a protective polypropylene bag – an airtight storage system designed to preserve quality for longer and regulate moisture content. Specialty roasters also favour 'PET' bags - a synthetic (but fully recyclable) alternative to the traditional jute bag that does not give any taint to the coffee over time. Some other specialty exporters ship coffees in 20-35kg vacuum packed boxes.

For more information over the EU Packaging and Packaging Waste Disposal Directive, refer to [EC Packing and Packing waste publications](#). See also the Draft Code of Hygienic Practice for the Transport of Foodstuffs of the Codex Alimentarius Commission at [ALINORM 99/13a](#).



Classification and grades for specialty coffees

Green coffee is graded and classified for export to meet the requirements of buyers, whose aim is to reach the best cup quality while securing the highest price possible. However, there is no universal grading and classification system in the coffee industry. Each producing country traditionally has its own system which it may use to set (minimum) standards for export.

Grading and classification is usually based on some of the following criteria:

- Origin country / region / altitude;
- Botanical variety;
- Preparation (wet or dry process = washed or natural);
- Bean size (screen size), sometimes also bean shape and colour;
- Number of defects (imperfections);
- Roast appearance and cup quality (flavour, characteristics, cleanliness, aroma, etc.);
- Density of the beans;

Most grading and classification systems include (often very detailed) criteria, e.g. regarding permissible defects, which are not listed here. For Specialty coffee two aspects are relevant:

- Absence of defects
- Cup quality score

The Specialty Coffee Association of America uses detailed "Green Coffee Protocols" which can be found at: [Green Grading Protocols Version 21.11.09A](#)

'European preparation' differs from one country to another. The examples refer primarily to the trade in mainstream coffee and do not reflect the often more detailed descriptions used for niche (specialty) markets.

Uganda Coffee Development Authority (UCDA) groups Ugandan coffee into three different categories of Arabicas and Robustas (Washed -Wugar and Drugar - Natural), according to Quality (Premium Grades, Specialty Grades and Miscellaneous Grades), sieve specifications (from ungraded 12 to 19 screen), Screen Retention and Permissible Defects. Only in Arabicas are regional distinctions made: washed Bugisu Wugar around Mount Elgon (Northeast), and Unwashed Drugar in North-West Uganda (West Nile region).

Specialty Ugandan grades consist of washed Arabica coffee from a particular location, of moisture content not more than 12.0%, with heavy solid beans of good appearance. The coffee is free from any traces of fermentation, mustiness or other undesirable smell or taints. The cup is of good flavour, evaluated above zero on the established chart values. More information available at: [The Coffee Regulations](#)

Additional requirements

For coffee, schemes for social and environmental standards are becoming increasingly common. Understanding the requirements of the consumers and buyers is an important step towards accessing the EU market. Below we have presented the most common social, economic and environmental standards with their respective focuses. These voluntary schemes focus on sustainability principles and are relevant for specialty and niche markets.

Corporate Social Responsibility (CSR)








In response to the growing interest from businesses and consumers in corporate social responsibility (CSR), the organisation ISO developed an international consensus on the meaning and implementation of best practice of social responsibility. The guidance "ISO 26000 on social responsibility" was launched in November 2010, aiming to provide practical guidelines to implement social responsibility. The CBI factsheets [Social Responsibility Guidelines ISO 26000](#) and [Human Rights as part of market access](#) provide more valuable information about these additional requirements. It is important to mention that the Codex also encourages food traders to voluntarily adopt ethical practices. To this end, the CAC has published a Code of ethics for international trade in food. See document at: [CAC/RCP 20-179](#).

Other additional requirements, such as environmental concerns, are growing in importance in EU markets. In the case of specialty coffee requirements, this may include organic and Fairtrade certifications. Specialty coffee buyers have indicated that organic certification, and Fair Trade in particular, would be beneficial and raise the quality of life of the coffee producer organizations.

Recommendation

It is strongly recommended for specialty coffee producers and exporters to be informed about the main international certification schemes, their focuses, costs, evolutions and trends, as well as to learn what schemes could be the most appropriate for their organizations, products and markets. Understanding the applicable legislative, non-legislative and voluntary certification schemes, as well as the requirements and costs, are important steps towards accessing the EU market.

Below there is a list of most common voluntary certification for the coffee sector relevant to the Ugandan coffee industry:

Aspect	Utz	Organic	Fair-trade	Rainforest Alliance	Common Code 4C	Bird friendly	Small Producers Symbol
							
Focus	1. Environment 2. Social 3. Economic 4. Quality 5. Ethics & Business Integrity	1. Environment 2. Quality System	1. Environment 2. Social 3. Economic 4. Quality 5. Ethics & Business Integrity	1. Environment 2. Social 3. Economic 4. Quality 5. Ethics & Business Integrity	1. Environment 2. Social 3. Economic 4. Quality 5. Ethics & Business Integrity	1. Environment 2. Social 3. Economic 4. Quality 5. Ethics & Business Integrity	1. Environment 2. Social 3. Economic
Who can Join?	The UTZ program is open to all, e.g. Small-scale producers, producers groups, small- and medium-sized enterprises, Large-scale enterprises, Vulnerable and minority groups.	The initiative is open to all agriculture operators	Small-scale producers and producers groups, small and medium-sized enterprises, Large-scale enterprises, Vulnerable and minority groups, Community-based organizations.	The initiative is open to all stakeholders.	Coffee farmers, importers and exporters, industry players (coffee roasters and retailers) and civil society (non-governmental organizations, standard-setting initiatives and trade unions). Members also include coffee associations, individuals and other chain members committed to the Association's goal.	The initiative is open to all stakeholders.	The Symbol may be used by producers, buyers and companies in the markets of approved countries such as: various countries in Latin America and the Caribbean, European Community, Switzerland, Canada and the United States.
How much does it cost?	Membership fee: There is no membership fee for producers. UTZ Certified invoices the last buyer of UTZ Certified coffee a program fee of \$0.0265 per kg of green coffee. This UTZ Certified fee covers part of	Membership fee: Not applicable	Membership fee: Depends on the number of production units and volumes of production among other factors.	Membership fee: No information available.	Membership fee: Depends on the position each member holds in the coffee supply chain and the total volume of green coffee produced, traded or purchased. Farmers pay the least and final buyers pay the	Membership fee: Organic certification is a pre-requisite	Membership fee: Annual Enrolment fee: - Up to 100 producers: \$150.00; - From 101 to 250: \$187.50 251 to 500 producers: \$375.00 From 500 to 1000: \$562.50 More than 1,000:

	the operational costs of the UTZ Certified organization, and enables UTZ Certified to provide its members with program services such as the traceability system, regional assistance and marketing materials.				most.		\$750.00.
How much is the certification or compliance cost? *	These costs highly depend on the Certification Body and contextual factors (size of production unit, volume of product to certify, etc.). A study made by the Belgian Technical Cooperation (BTC) Trade for Development Centre states that audit costs may vary between 500 and 4500 USD for large group certification.	Depending on the member states and certification body, as well as the number of units to be certified. For further information please ask certification bodies in the member countries.	The fees depend on the number of members, workers and production sites. Special rates for very small organizations and plantations apply. Average annual fees for Small Producers' Organizations are between 2000 and 3000 Euros. Average annual fees for plantations - between 3000 and 4000 Euros. Covered in FLO-CERT Fee Lists	The cost is determined by each of the accredited independent certifying bodies	Average cost is 2700 Euros.	Average cost between 400 to 1300 Euros, depending on the time used for inspection.	Up to 100 producers: \$300; From 101 to 250: \$325; 251- 500: \$350; 500 to 1,000: \$ 400; More than 1,000 producers: \$450. Complete procedure: Document-based evaluation: \$ 120 (Work day); Evaluation Report: \$120 (Work day); Field Evaluation: \$120 (Work day); Examination: \$ 120 (Work day); Control Inspection Fee: \$60; Operation Expenses of Certification Entity (% over expenses) 30%.

* Membership fee (if required) is related to the cost of belonging to the organisation or voluntary certification. It differs than certification/compliance cost, as this latter cost mostly depends on the certifying bodies (size of production unit, volume of product to certify, number of members, etc.).
Source: Based on [ITC Standards Map](#) and direct sources.

This survey was compiled for CBI by Rafael Valcarce P., CBI sector expert

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