

# Which requirements should coffee comply with to be allowed on the European market?

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Buyer requirements can be divided into two groups: (1) legal and additional requirements which are applicable to all coffee exporters and (2) niche requirements, for coffee exporters aiming at accessing specific segments. Food safety is an important focus in legislative and additional requirements for coffee, including prevention of contamination. In terms of niche requirements, the growing importance of certification schemes follows the European trend towards ethical consumption. Nonetheless, high quality in itself is an important determinant in specialty markets.

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## 1. What legal requirements must my product comply with?

Here you can find requirements you must meet when marketing your products in Europe.

- Food safety: Traceability, hygiene and control
- Avoid contamination to ensure food safety
- Extraction solvents — relevant for decaffeinated coffee only
- General requirements on packaging and liability

### Food safety: Traceability, hygiene and control

When it comes to food products such as coffee, the main focus of European Union's legislation is food safety. The [General Food Law](#) (European Commission Regulation 178/2002) is the legislative framework for this subject. Food products must be traceable throughout the entire supply chain to guarantee food safety, to allow appropriate action in cases of unsafe food and to limit risks of contamination. An important aspect to control food safety hazards is defining critical control points (HACCP) by implementing food management principles. Subjecting food products to official controls is another important aspect. Products that are not considered safe will be denied access to the European Union.

#### Tip:

- Read more about [health control](#) on the European Union's Trade Helpdesk.

To help you answer key questions about health control refer to the [guidance document](#) of the European Union.

## Control of food imported to Europe

In the event of repeated non-compliance of specific products originating from particular countries stricter conditions, such as a health certificate and analytical test report, are required for import. Products from countries that have shown repeated non-compliance are put on a list included in the Annex of European Commission [Regulation 669/2009](#).

### Tips:

- Check the website of EUR-Lex for the most recent list included in the Annex of European Commission [Regulation 669/2009](#) (see under *Amended by*). The list of products and countries subjected is updated regularly. It is important to keep updated on developments despite the limited increased levels of controls for coffee.
- Refer to the [European Union's Rapid Alert System for Food and Feed \(RASFF\) database](#) to see examples of withdrawals of coffee from the market and the reasons behind these withdrawals. Under 'Product', choose the category 'cacao and cacao preparations, coffee and tea'. In addition, you can choose your country under 'Country' to see examples of non-compliances. This can be a basis for your own risk management system and to avoid future border rejections.

## Avoid contamination to ensure food safety

Contaminants are substances that may be present as a result of the various stages of growing, processing, packaging, transport or storage. Threshold limits for several contaminants force to avoid negative impact on the quality of food and risks to human health. The different forms of contamination are:

- **Pesticides:** The presence of pesticides is one of the most common reasons for border authorities to reject coffee coming from producing countries. European Union's legislation on Maximum Residue Levels (MRLs) of pesticides establishes the MRLs of pesticides permitted in products of animal and vegetable origin which are intended for human consumption. MRLs are relevant to many natural ingredients, including coffee. Be aware that products containing more pesticides than allowed will be withdrawn from the European Union's market.
- **Mycotoxins:** Moulds and fungi are another important reason for border rejections for coffee. Ochratoxin A (OTA) levels are a specific point of attention; nonetheless, there are no specific limits for green coffee beans – since the product is roasted or goes through other types of processing before reaching consumers. For roasted coffee beans and ground roasted coffee, the maximum level of Ochratoxin A (OTA) is set at 5 µg/kg while the maximum is set at 10 µg/kg for soluble coffee (instant coffee).
- **Salmonella:** It is a very serious form of contamination and occurs occasionally as a result of incorrect harvesting and drying techniques. Coffee beans are considered low-risk commodities regarding salmonella contamination. In the current [European Union legislation](#) no microbiological criteria specifically targeting coffee have been set. Food safety authorities however can withdraw imported food products from the market or prevent them from entering Europe when Salmonella is found present. Irradiation is a way to combat microbiological contamination but this is not allowed by [European Union's legislation](#) for coffee.

### Tips:

- Check the website of EUR-Lex for more information on [limits for different contaminants](#).
- To find out the maximum residue level (MRLs) that are relevant for your products, you can use the European Union [Maximum Residue Limit database](#) in which all harmonised MRLs can be found. You can search on your product or pesticide used. Read more about MRLs on the [website of the European Commission](#). Check with your buyers if they require additional adherence to MRL limits and pesticide

use.

- A good way to reduce the amount of pesticides is the [application of integrated pest management \(IPM\)](#) – this European agricultural pest control strategy is an example that uses complementary strategies including growing practices and chemical management.
- The risk of contamination of any kind can be prevented by better growing, drying, processing and storage practices. Discuss Good Agricultural Practices (GAP) with your suppliers.
- Read and follow the *Codex Alimentarius' Code of Practice for the Prevention and Reduction of Ochratoxin A Contamination in Coffee* (CAC/RCP 69-2009).
- For information on safe storage and transport of coffee, refer to the website of the [Transport Information Service](#).
- Check the European Commission's factsheet on food contaminants "[Managing food contaminants: how the European Union ensures that our food is safe](#)".
- Read more about contaminants in coffee on the European Commission [Trade Helpdesk](#).

## Extraction solvents

Solvents can be used for decaffeination of coffee. There are maximum residue limits restrictions for the extraction solvents such as methyl acetate (20 mg/kg in the coffee), dichloromethane (2 mg/kg in the roasted coffee) and ethylmethylketone (20 mg/kg in the coffee).

### Tip:

- Refer to [European Union Directive 2009/32/EC](#) for more information about the restriction of extraction solvents.

## General requirements on packaging and labelling

Note that there is also non product specific legislation on [labelling and packaging](#) in the [European Union Directive 2009/32/EC](#) that apply to all goods marketed in the European Union.

Full overview of requirements for coffee:

For a list of requirements, consult the [European Union's Trade Helpdesk](#). Here you can select your specific product codes under chapter 09 (coffee).

## 2. What additional requirements do buyers often have?

### Quality classification

Quality is the result of many factors in coffee production and processing. Most important are the place of origin of the product, the specific coffee variety (Robusta or Arabica, and Arabica sub-varieties: Bourbon, Castillo, Geisha and other), the adequate sowing and agronomic management, the harvest and post-harvesting processes and the industrialisation of the bean.

The attributes of a green coffee are related to its physical and intrinsic quality: factors like moisture content, colour, greenish shrivelled, bean size and defect count could lower the value and quality of coffee; their absence could result in a premium coffee (speciality coffee).

Sensorial attributes of the roasted coffee are also related to the extraction process. These quality attributes can vary depending upon the principal organoleptic qualities that are used to evaluate the beverage which are:

- Aroma
- Flavour
- Acidity
- Body
- Bitterness
- Global impression and aftertaste

Each of these five attributes are reflected in both intensity (how much) and quality (how good), which are based on [cupping protocols](#). Overall ratings provide a summary assessment based on a scale of 50 to 100; the higher the score, the better the quality.

In spite of the wide classifications of speciality / specialty coffees worldwide, the Specialty Coffee Association of America (SCAA), recently integrated into the [Specialty Coffee Association \(SCA\)](#), uses a cupping score above 85 as a quality criterion for this coffee segment. This is an important and measurable quality criterion for speciality coffee.

Q graders, relevant for Arabica coffee (and recently R Graders, relevant for Robusta coffee), are [in charge of assigning a score to](#) the coffees evaluated according to cupping protocols; the [Coffee Quality Institute](#) is the institution providing training to Q and R graders.

The Organisation for Standardisation (ISO) also provides [specific standards](#) on coffee quality, such as [ISO 10470](#) (Green coffee - Defect reference chart).

### Tip:

- Promote the quality of your coffee: Start by giving an accurate description of the physical properties of the coffee: which screen sizes are used, which and number of defects; at what altitude was the coffee grown; how have the cherries been processed, etc. Additionally, if possible, give a rating and mention the cupping protocol of the rating.

## Quality management standards

As food safety is a top priority in all European food sectors, you can expect many players to request extra guarantees from you, such as the implementation of product-specific quality standards and Quality Management Systems (QMS) regarding the production and handling processes.

The [International Coffee Organisation](#) (ICO) has introduced voluntary targets for minimum quality export standards for Arabica and Robusta under [resolution 420](#). The resolution aims to reduce the export of inferior beans. Coffee exporters are advised to closely follow this resolution, except for the exports of specialty coffees which can be exempt from some of the targets as long as this is clearly mentioned in the Certificate of Origin.

As the bulk of green coffee beans sourced in producing countries will still be roasted in the export destination, quality or food safety management systems related to processing are often not required. However, some coffee buyers might require exporters to comply with a quality or food safety management system, for example [ISO 9001](#) or [ISO 22000](#), which are based on hazard analysis and critical control points (HACCP) principles. This is especially the case when exporting roasted coffee beans.

Coffee exporters might also find it useful to refer to the website of [SGS](#), the world's leading inspection, verification, testing and certification company, for further information on HACCP and other food safety standards.

## Tips:

- Familiarise yourself with food safety / Quality Management Systems (QMS). Read more about HACCP and health control in the [guidance document](#). Read more about how to manage HACCP for coffee on the website of [International Trade Centre: Coffee Guide](#).
- Different buyers may have different preferences for a certain management system, so before considering certification for one of these standards, it is advised to check which one is preferred. All the mentioned management systems are recognised by the [Global Food Safety Initiative \(GFSI\)](#), which means that any of them should be accepted by several major retailers. In practice, however, some buyers still have preferences for one specific management system.
- Read more on the different Food Safety Management Systems at the [International Trade Centre's Standards Map](#).

## Corporate responsibility

European buyers may expect you to comply with their supplier codes of conduct regarding social responsibility, which are often based on the [International Labour Organisation's standards](#). This can be the importer's own code of conduct or a code of conduct as a part of an initiative in which the importer is participating. The adoption of those standards is most common among large-scale importers, roasters, manufacturers and retailers; examples: [Starbucks](#) and [Nespresso](#).

This also affects you as a supplier. Common requirements are the signing of a suppliers' code of conduct in which you declare that you do your business in a responsible way, meaning that you (and your suppliers) respect local environmental and labour laws, stay away from corruption etc. These aspects are also investigated further in company audits carried out by your (potential) buyer.

In addition, sustainability in the coffee sector has been formalised in several agreements and partnerships between exporting countries, European buyers and governing bodies such as the International Coffee Organization (ICO). These agreements are signed by important industry players that are (becoming) important in the coffee sector. For more information: [International Coffee Agreement 2007](#).

## Tips:

- Be aware that many of the environmental and social sustainability issues take place at farm level (which may not be a part of your company). Think about a way to assure responsible business at the premises of your suppliers. To test to what extent your farmers are sustainable you could ask them to fill in the [Farm Sustainability Assessment](#) by the Sustainable Agriculture Initiative.
- Check whether you can adhere to the guidelines laid down in the industry agreements. They can be a good starting point if you want to certify products. Consider participating or visiting roundtable meetings (via conference call) or seminars to meet industry players and other interesting stakeholders.
- Check the specific governing body [International Coffee Organisation \(ICO\)](#) and their programmes for producer support to implement sustainable practices.

## Sustainable certification for the mainstream market

Certification is the most common way to show compliance with Corporate Social Responsibility criteria.

Various certifications focus on different issues and are popular in different countries or segments. Traditionally,

certification focuses on either environmental or social issues.

Nowadays, the above-mentioned issues are increasingly integrated. The demand for certified coffee is driven by ambitious goals of industry players and consortia like the [Dutch Sustainable Trade Initiative](#), which aims to increase the amount of sustainable coffee on the Dutch and European market.

Understanding the different certification standards is an important step towards accessing the EU market. Most important certifications for the coffee market focus on moving the main trade channels towards sustainability. The most common certifications are listed below:

- [Rainforest Alliance \(recently merged with UTZ\)](#): [Rainforest Alliance](#) is the most commonly used mainstream certification scheme for coffee. In 2017, [UTZ and Rainforest Alliance announced a merger into a single organisation and certification under the name Rainforest Alliance](#). As of 2019, this organisation uses the respective strengths of the current Sustainable Agriculture Network (SAN) and UTZ standards while creating a single auditing process for certificate holders, under a new single standard.
- C.A.F.E. Practices: C.A.F.E. Practices is a green coffee sourcing program developed by Starbucks in close collaboration with a non-governmental organization and certification and auditing company. [The C.A.F.E. Practices Generic and Smallholder Scorecards](#) encompass a set of social, economic and environmental indicators, which need to be audited in order to carry the label. The code of conduct takes into account the entire supply chain: from the farmer to the consumer.
- Nespresso AAA: The [Nespresso AAA Program](#) was launched in collaboration with Rainforest Alliance to increase the quality of green coffee used for Nespresso as well as secure the livelihoods of the farmers. The AAA program provides support to coffee farmers, training and technical assistance to improve sustainability and productivity while maintaining the highest quality.
- 4C Association: the Common Code for the Coffee Community ([4C Association](#)), a verification rather than certification scheme, which was [acquired in 2018 by Meo Carbon Solutions](#).

### Tips:

- Have a look at the website of [Rainforest Alliance](#) and the website of [UTZ](#) to identify the main retailers and companies using these sustainability certifications, which are now integrated into one scheme.
- Most certification schemes have tools and other types of assistance to help you understand the criteria and educate you on how to become certified. For example, UTZ provides [tools to help producers establish an internal control system](#), guides for the implementation of good practices and an [e-learning guide](#). Rainforest Alliance provides [\(online\) training](#).

## 3. What are the requirements for niche markets?

### Niche market certification

These other certification standards primarily focus on strict and/or specific sustainability principles and therewith apply to niche segments of the coffee market. Specific certifications per theme for this market are listed here:

### Organic

Organic certification is a non-legal requirement for coffee but, in order for a company to market their product as 'organic' in the European market, it must comply with the European Union's regulations for organic production and labelling - which is in itself a legal requirement. The requirements for organic production and labelling are laid down in [European Union legislation](#) and an accredited certifier must audit growing and processing facilities.

## Fair Trade

Having your coffee Fair Trade-certified is the proven way to show your business performance for social conditions in your supply chain. After certification by an independent third party, you are allowed to put the Fairtrade logo on your product. In general, prices for fair trade products consist of a minimum price plus a premium.

The [Fairtrade Labelling Organisations International \(FLO\)](#) is the leading standard-setting and certification organisation for Fairtrade. Products which carry the Fairtrade label indicate that producers are paid a Fairtrade Minimum Price. The current minimum prices and premiums for coffee, whether organic-certified or conventional, can be found in the [Fairtrade Minimum Price and Fairtrade Premium Table](#).

Other fair trade standards available in the European market are Fair Trade Ecocert and Fair for Life. [Fair Trade Ecocert](#) provides for guaranteed minimum prices, producer support and good agricultural practices. For this standard, an organic certification is required. [Fair for Life](#) has a similar proposition, and is a standard for companies which demonstrate decent working conditions and commit to fair sourcing and responsibilities towards their primary producers. Fair for Life certification of products also confirms traceability of all certified products from production to sales. Organic certification is not compulsory for Fair for Life holders.

## Biodiversity

There are multiple certification standards that focus on biodiversity, including Demeter, SMBC Bird Friendly and FGP-certifications.

[Demeter](#) is a biodynamic certification label and regarded as the highest grade of organic farming in the world. Certification is difficult to come by and must be renewed annually. Demeter's biodynamic certification requires biodiversity and ecosystem preservation, soil husbandry, livestock integration and prohibition of genetically engineered organisms. The certification verifies the fulfilment of the standards on behalf of the farmers, which in turn guarantees high quality coffee to the consumers. This is rewarded by receiving a higher price for coffee certified with the "Demeter" label with a mark-up ranging from 10-30% on average.

[SMBC Bird Friendly](#)-certifications: This certification promotes the growth of coffee that is economically, environmentally and socio-culturally-viable. Coffee grown in the shade of tree canopies, rather than on land cleared of other vegetation, provides a habitat for a number of species. Shade trees protect the coffee plants from rain and sun, help maintain soil quality, reduce the need for weeding and aid in pest control, while organic matter from shade trees reduces erosion, contributes nutrients to the soil, and prevents metal toxicities. Shade-grown coffee is given the [Smithsonian's Bird Friendly label](#) if the growing conditions meet organic standards, as well as other criteria such as canopy height, foliage cover and number of bird species.

The [Forest Garden Products](#) certification: The [Forest Garden Products](#) (FGP) certification has been developed to market food products, including coffee, derived from Analog Forestry - an approach to ecological restoration which uses natural forests as guides to create ecologically stable and socio-economically productive landscapes. FGP's specifications detail the steps to be taken to ensure the renewal of degraded vegetation and soil, improve yields and reduce erosion, stabilise or reverse deforestation, implement natural and organic production, and transmit expertise about replanting for bio-diversification. In short, FGP certifies for biodiversity in conditions beyond organic production. More information can be found in the website of the [International Analog Forestry Network](#).

## Other

Among certifications which focus on social impact and small producers, the [Símbolo de Pequeños Productores \(SPP\)](#) addresses standards for community-based sustainability principles. The SPP is supported by an independent certification system. Its label represents the alliance among organized small producers who build a local and global market that values the identity and the economic, social, cultural and economical contributions

of products from small producers' organizations. As a [producer](#) you can also become a part of this network.

### Tips:


- Implementing organic production and becoming certified can be expensive, especially for small holders. In the current market the return on investment may not be high. On the other hand it can increase yields and improve quality. Consult your (potential) buyer in order to verify whether organic certification is required by them.
- Have a look at the website of the International Federation of Organic Agriculture ([IFOAM](#)). Here you can find the different organic labels, that fall under this umbrella organisation.
- Consult the [International Trade Centre's Standards Map](#) database for the different organic labels and standards.
- Before engaging in a Fair Trade or other sustainability certification programme, make sure to check (in consultation with your potential buyer) that this label has sufficient demand in your target market and whether it will be cost beneficial for your product.
- Next to certification, transparency of the supply chain is an asset in the specialty segment. Communicate a traceable and clear, direct link between producer and consumer.

This study has been carried out on behalf of CBI by [ProFound – Advisers In Development](#).

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