EUROPEAN COFFEE FEDERATION

ECF COMMENTS ON SETTING MAXIMUM LIMITS/INDICATIVE LEVELS ON MOAH/MOSH IN COFFEE

Virtual Stakeholder Forum on Mineral Oils

18 January 2024

Gloria Pellegrino
ECF Contaminants Committee Chair

EUROPEAN COFFEE FEDERATION

- Since 1981, ECF is the **single voice** of the **European Coffee Trade and Industry**

- ECF facilitates the development of an environment in which industry can meet the needs of consumers and society whilst ensuring the resilience and long-term sustainability of the Coffee supply chain

- **16 National Associations**
- **39 Corporate Members**

} **Over 750 Companies**

- Total import volume: 2.5 million tons of green coffee
  ~ 35% of the world trade volume

MOH - NEW REGULATORY FRAMEWORK

- ECF supports the need to ensure a high level of **human health protection** in accordance with the ALARA principle
- In the light of preliminary studies, ECF believes that there is **no need to introduce MLs for MOAH and indicative values for MOSH in Coffee** considering that:
  - Coffee is not consumed directly but extracted and highly diluted. As per Commission Regulation (EU) 2023/915 of 25 April 2023, Art. 3: "*changes of the concentration of the contaminant caused by dilution processes, shall be taken into account when applying the maximum levels*"
  - Based on initial analytical data and scientific research to be published, a below 5% transfer into the brew is observed given that mineral oils are insoluble in water
- ECF kindly requires additional time to produce a thorough processing study and to compile additional datasets to reconfirm the initial findings

MOAH - NEW REGULATORY FRAMEWORK

- ECF believes that **there is no need to introduce MLs for MOAH in Coffee**
- Should MLs be set for the **finished product** or '**as sold' to the consumer, the corresponding LOQ values,** considering the 2022 Recommendation and the New Draft Regulation, are:

SOLUBLE COFFEE

Products with a fat ≤ 4% fat/oil content

0.50 mg/kg

1 cup of soluble coffee (2 g)
based on a 100% transfer rate
0.001 mg/cup

ROASTED COFFEE

Challenge!

Products with > 4% and ≤ 50% fat/oil content

1 mg/kg

1 cup of coffee (8 g)
based on a 5% transfer rate
0.0004 mg/cup

ECF DATA COLLECTION

MOAH DATA POOLING 2017-2023

	N	>LOQ
Green Coffee (LOQ =1 mg/kg)	3100	1.8%
Roasted Coffee (LOQ =1 mg/kg)	439	5.9%
Coffee beverage (LOQ =0.5 mg/kg)	35	**0%**
Soluble Coffee (LOQ=0.5 mg/kg)	59	**0%**

MOAH have excellent miscibility with oils and fats. The amount of lipids in the soluble coffee and in the coffee beverage is ≤ 0.04%. In the roasted coffee it's 17%

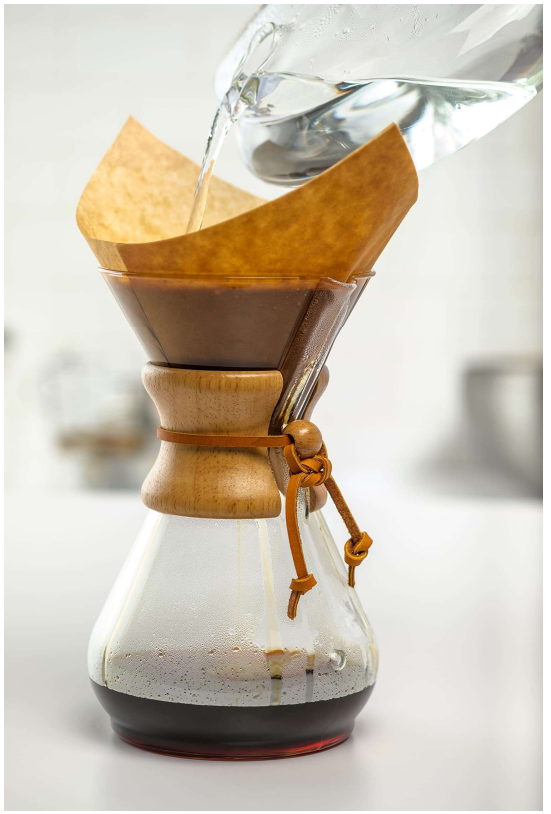
For Roasted Coffee (P95: 2.3 mg/Kg), the suggested ML set at 1 mg/kg, would have a significant impact on the coffee sector (**food waste!**)

The coffee sector kindly requests further time to:

- Reconfirm the low transfer into the brew
- Identify effective mitigation measures to reduce the presence of mineral oils in Coffee beans

BEVERAGE AND TRANSFER RATES

- Preliminary industry studies have observed that **MOAH transfer into the beverage is reduced by over 95%**
  - The observation is consistent with the findings of the tea and herbal infusion sector
  - Even if limited, the ECF dataset does not show any traces of MOAH in the beverage
  - Values <LOQ in soluble coffee confirm low transfer rate
- Should Roasted Coffee have a ML exceeding the LOQ, the actual content in the final beverage would still be insignificant



GREEN COFFEE & JUTE BAGS

MOAH'S PATHWAY INTO COFFEE

EUROPEAN COFFEE FEDERATION

- Green Coffee is grown between the tropics of Cancer & Capricorn, in over **60 producing countries** by **12.5 million farmers**
- As for cocoa, the **batching oils used to produce the jute bags** appear to be the main source of MOAH contamination. Jute bags, may be used to transport and store Coffee at origin
  - ESCC* Article 5 (a). *The Coffee shall be packed in sound uniform **natural fibre bags** suitable for the transport of Coffee, i.e. (…) **suitable for food contact use** (…)*
  - In collaboration with Jute manufacturing Countries, the current standard specification of International Jute Organisation (IJO 98/01, revised in 2005) should be revisited

* European Standard Coffee Contract

- **ECF continues to identify ways to ensure the use of food grade jute bags in producing Countries**

MOSH - NEW REGULATORY FRAMEWORK

- ECF believes that there is **no need to introduce specific indicative levels for MOSH in Coffee** considering that:
  - the conclusions of EFSA's update of the risk assessment of mineral oil hydrocarbons in food, published on 13 September 2023 that confirm that "*the present dietary* ***exposure to MOSH does not raise concern for human health for all age classes***";
  - the **transfer into the brew is below 5%**
- ECF would suggest not creating an additional burden to Member States and Companies with the testing for the presence of MOSH in Coffee
- Should indicative values be set on the product 'as sold' to the consumer, the levels need to be consistent with the Sector's values. The suggested 10 mg/kg would require further consideration

WAY FORWARD

ECF WILL CONTINUE ITS WORK

- Develop **a processing study** to reconfirm the limited transfer into the brew
- Continue to monitor and assess the overall situation (**call for data**) and to help establish effective mitigation measures
- **Engage with the main jute bag manufacturing Countries/producers**: awareness, update standard, use of vegetable oils, certifications, etc.
- Continue to **raise awareness** regarding the use of food grade jute bags in Coffee producing countries
- Promote **cross sector collaboration** with the cocoa and tea & herbal infusions sectors

FINAL CONSIDERATIONS

ECF believes there is no need to introduce MLs for MOAH or indicative values for MOSH in Coffee

Should the EC require additional information to consider an exemption, the Coffee sector kindly requires **ADDITIONAL TIME**:

- To **develop a thorough processing study** that will further prove that the transfer into the brew is insignificant, and no ML or indicative value should be necessary
- **To address the following challenges:**
  - Complexity of the Coffee supply chain
  - Implementation of mitigation measures in third countries
  - Analytical methods (Coffee is a complex matrix)

THANK YOU
FOR YOUR ATTENTION

European Coffee Federation
Avenue des Nerviens 9-31
B-1040 Brussels

T: +32 (0)2 549 56 41
egordon@ecf-coffee.org
glamberti@ecf-coffee.org