Private Sector Consultative Board
49th Meeting
8 September 2020
London, United Kingdom

Communication received from the European Coffee Federation

Background

The attached communication has been received from the European Coffee Federation.

Action

PSCB members are requested to consider the attached communication.
Brussels, 6 August 2020

Dear ICO Member,

Grateful to the International Coffee Organization for giving us the opportunity to reach out to you today, we take the opportunity to bring to your attention the **EU Pesticide Renewal Procedure** under Regulation (EC) **No 1107/2009**, and the associated **Maximum Residue Limit (MRL) procedure** according to Regulation (EC) **No 396/2005**.

As a result of this procedure, kindly allow us to highlight the following:

1. In January 2020 the European Commission published Implementing Regulation (EC) **No 2020/17** and (EC) **No 2020/18** by which Member States had to withdraw authorisations for plant protection products containing chlorpyrifos-methyl and chlopyrifos as an active substance by 16 February 2020. The decision was adopted based on the European Food Safety Authority’s (EFSA) opinion that concluded that both active substances do not meet the criteria required by legislation for the renewal of its approval. Accordingly, the associated Regulation lowering the MRLs, (EC) **No 2020/1085** and corrigenda published on 30 July 2020, **reduced all MRLs to 0.01 mg/kg** with application date 13 November 2020.

Even though the residue values found in green coffee are not common and significantly low, traces over 0.01 mg/kg and below the current 0.05 mg/kg may be found. This fact is a reason of concern to the European Coffee sector as from **13 November 2020**, **green coffee with Chlorpyrifos and Chlorpyrifos-Methyl values over 0.01 mg/kg may not be commercialized in the EU market.**

2. The European Commission shall be soon addressing the renewal of Glyphosate MRL’s. As a relevant part of the process **EFSA’s review of the existing maximum residue levels for glyphosate** approved on 27 September 2019, shall be taken into consideration. Despite there being no residue trials available for green coffee beans **EFSA proposes that the green coffee MRL is lowered from 0.1 mg/kg to 0.05 mg/kg.**
As ECF we put together a database with over 4,800 data entries related to coffee originating from 40 different countries. The dataset highlighted the fact that if the MRL is lowered to 0.05 mg/kg, 1/3 of the green coffee database entries would be over the MRL value and thus not able to be commercialized in the EU market.

Taking the ECF database as a reference, the overall impact on green coffee trade volume is estimated at EUR 2.1 billion.

May these lines serve to raise awareness of the current situation we are facing in Europe. A situation that will be affecting us all. We thus invite you to join our advocacy to maintain the current MRL for green coffee whilst we continue to increase awareness of the importance of reinforcing Good Agricultural Practices (GAP) at origin. A joint approach is critically important for the entire coffee industry as we must bear in mind that we could be facing a EU non-renewal of the use of Glyphosate as an active substance in December 2022. If this were the case the MRL would drop further to a default 0.01mg/kg.

Please feel free to contact us directly if you would like to follow-up with any specific questions regarding the procedure or the impact it could have in green coffee traded from your country.

We appreciate your consideration and look forward to your feedback remaining at your entire disposal.

Yours sincerely,

Mario Cerutti
President ECF

Eileen Gordon
Secretary General ECF