ECF COMMENTS ON EFSA DRAFT OPINION ON ACRYLAMIDE IN FOOD

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European Coffee Federation

- ECF is the umbrella organisation representing the European green coffee trade, coffee roasting industry, soluble coffee manufacturers and decaffeinators.
- Membership consists of 14 national coffee association members and 18 company members
- Annual green coffee usage of ECF members equates to over half of global coffee imports.

General comment

- ECF would like to express its appreciation for the opportunity to highlight the comments made during the on-line consultation. Ours focus is on coffee specific items relevant in the exposure assessment and not so much on the risk assessment.

Specific comments

1. Statement that AA was found at the highest levels in ‘Coffee and coffee substitutes’ (abstract, summary and conclusions)
2. Statement that ‘roasted coffee’ was found to be less contaminated than ‘instant coffee’ on basis of the analysis of the ‘dry (as sold)’ products (lines 1435-1436 and conclusions)
3. Comparison between ‘regular’ and ‘decaffeinated’ coffee (lines 1441-1445)
4. Statement that ‘coffee and coffee substitutes’ showed increasing levels during the 2007-2010 period (lines 1467-1468)
5. Dilution factor used to recalculate from coffee substitutes (solids) to coffee substitutes (beverage) (lines 2006-2008)
6. Recommendations on terminology to describe coffee beverages

1. AA was found at the highest levels in ‘Coffee and coffee substitutes’ (1)

- Statement refers to acrylamide levels in ‘dry (as sold)’ coffee and coffee substitute products
- However, these are not consumed as such; AA levels in ‘dry’ products not relevant in a context of exposure and risk assessment (of course we acknowledge that the exposure assessment is done with conversion factors to result in ‘as prepared for consumption’ levels)
- Maybe even misleading when comparing these levels with other products which are consumed as sold

1. AA was found at the highest levels in ‘Coffee and coffee substitutes’ (2)

- Grouping together of coffee and coffee substitutes in a single category not appropriate (as already illustrated by the existence of separate indicative values)
- Comparing ‘dry’ with ‘as consumed’

	'Dry'	**'As consumed'**	
	Table 6 (lines 1359-1360) mean middle bound levels (µg/kg):	Table D1 (lines 9350-9351) AA occurrence levels (µg/kg):	
Roasted coffee	249	13	
Instant coffee	710	12	
Substitute coffee, based on cereals	510	30	(corrected dilution factor)
Substitute coffee based on chicory	2942		
Substitute coffee unspecified	415		

1. AA was found at the highest levels in ‘Coffee and coffee substitutes’ (3)

- Statement that AA was found at the highest levels in ‘Coffee and coffee substitutes’ gives the impression that this is the case across all sub-categories, while it is correct only for the much smaller market of the chicory-based coffee substitutes (2,3% of coffee market). Even then, this is on a dry matter basis, not ‘as consumed’ so actual amount as consumed is much lower and not the highest.

1. AA was found at the highest levels in ‘Coffee and coffee substitutes’ (4)

- ECF therefore proposes:
  - To split the ‘coffee and coffee substitutes’ into the two sub-categories.
  - To refer to acrylamide levels in coffee and in coffee substitutes as consumed
  - To remove or revise the statement that AA was found at the highest level in ‘coffee and coffee substitutes’

2. ‘Roasted coffee’ was found to be less contaminated than ‘instant coffee’ (lines 1435-1436)

- This refers to levels in products ‘as sold’ which is less relevant in the context of exposure assessments than comparison of levels in the products ‘as prepared for consumption’
- Mean level ‘as prepared for consumption’ (using EFSA mean values and dilution factors)
  - roast coffee 13.2 µg/kg
  - Instant coffee 12.1 µg/kg
- Conclusion: levels of acrylamide in both sub-categories are not significantly different. Text should reflect this.

3. Comparison between ‘regular’ and ‘decaffeinated’ coffee (lines 1441-1445)

- Comparison in the draft opinion is based on monitoring data
- However, ‘regular’ and ‘decaf’ subsets are not comparable due to different blends and roasting conditions.
- Proposal: refer to the conclusion on the effect of decaffeination in the FoodDrinkEurope Toolbox:
  - ‘Trials showed that roasting of decaffeinated green coffees … resulted in AA levels of the same magnitude as roasting of corresponding untreated coffees when roasted under comparable roasting conditions.’

4. ‘Coffee and coffee substitutes’ showed increasing levels during the 2007-2010 period (lines 1467-1468)

- Reference to the 2012 EFSA monitoring report
- However, this trend analysis was
  - based on data for instant coffee only and on a very small data base (e.g. only 15 samples for 2010)
  - driven by lower than realistic mean levels for 2007 and 2008
- Industry data provided to EFSA do not confirm a trend of increasing levels in instant coffees over time.
- Proposal: remove reference to coffee in the statement of increased levels for the 2007 – 2010 period.

5. Dilution factor to recalculate coffee substitutes from solids to beverage (lines 2006-2008)

- Dilution factor used to recalculate from coffee substitutes (solids) to coffee substitutes (beverage): 0.125.
- Not in accordance with actual market practice and advices for product preparation.
- Proposal: use dilution factor of 0.02.
  - More specifically, the dilution factor of 0.02 only applies to ‘as sold’ soluble coffee substitute products. A different factor in the same magnitude as the dilution factor for drip filter coffee (0.053) should be taken for ‘as sold’ roast & ground coffee substitute products.

Thank you

Questions/comments: ecf@ecf-coffee.org