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EU ORGANIC COFFEE

SAMPLING, TESTING & LOT TRACEABILITY PROCEDURE FOR EXPORTERS

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1. PURPOSE

This procedure defines the requirements for:

- Representative sampling
- Laboratory testing
- Traceability verification
- Shipment approval
- Non-conformity management

To ensure that green coffee shipments comply with Regulation (EU) 2018/848 and applicable EU food safety requirements. The objective is to protect the organic integrity of the product while maintaining transparent and fair commercial relationships.

2. SCOPE

This procedure applies to:

- All organic green coffee lots intended for export into the European Union
- All suppliers, exporters, cooperatives, warehouses and processors involved in handling such products.

Each contracted lot **must comply prior to shipment.**

3. REGULATORY FRAMEWORK

Shipments must comply with:

- Regulation (EU) 2018/848 (Organic production and Labeling)
- EU Import control system (TRACES NT COI validation)
- EU food safety contaminant legislation where applicable
- ISO-recognized samplig and laboratory standards

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4. MANDATORY ANALYTICAL TESTING

4.1 REQUIRED TESTS

Each lot must be tested by an ISO/IEC 17025 accredited laboratory for:

- Multi-residue pesticide screening
- Glyphosate and AMPA (if not included in multi-residue scope)

4.2 RISK-BASED ADDITIONAL TESTS

Depending on origin risk profile:

- Ochratoxin A
- Heavy metals (Lead, Cadmium, Arsenic)
- Chlorate / Perchlorate
- PAHs where drying smoke exposure is possible

4.3 RESIDUE INTERPRETATION

Detection of prohibited substances at or above the laboratory **Limit of Quantification (LOQ)** may:

- Trigger investigation by the control body
- Lead to temporary suspension of organic status
- Require corrective actions.

Final determination of organic compliance shall be made in accordance with the EU organic control procedures.

5. LOT SAMPLING PROCEDURE

5.1 SAMPLING RESPONSIBILITY

Sampling may be performed by:

- Trained exporter personnel following documented procedures
- Or an independent inspection company (recommended for higher-risk origins)

5.2 REPRESENTATIVE SAMPLING REQUIREMENTS

Sampling must follow recognized standards such as ISO coffee sampling guidelines.
Minimum requirements:

- Increments drawn from multiple bags across the lot
- Increments taken from top, middle and bottom sections
- Statistically representative coverage of the lot
- Composite sample homogenized before sub-division.

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5.3 SAMPLING DIVISION

Composite sample shall be divided into three sealed sub-samples:

1. Laboratory sample
2. Counter sample retained by supplier
3. Buyer reference sample (upon request)

5.4 SAMPLE RETENTION

Counter samples must be retained for **at least 18 months**.

5.5 SAMPLE IDENTIFICATION

Each sample much include:

- Lot identification matching shipping marks
- Supplier / cooperative name
- Warehouse location
- Sampling date
- Sampler name
- Number of bags represented
- Seal number

6. LABORATORY REPORT REQUIREMENTS

Certificate of Analysis (COA) must:

- Be issued before Bill of Landing date
- Reference sample ID and seal
- State laboratory accreditation
- Specify analytical method
- Include LOQ values
- Be issued in English

Preferred analytical methods:

- LC-MS/MS (Liquid Chromatography-Tandem Mass Spectrometry)
- GC-MS/MS (Gas Chromatography-Tandem Mass Spectrometry)

7. ORGANIC DOCUMENTATION REQUIREMENTS

Before shipment approval, supplier must submit:

- Sampling report

- Certificate of analysis
- A valid electronic Certificate of Inspection (COI) must be issued in TRACES NT by an EU-recognized control body
- Internal Traceability Record
- Transport / warehouse organic segregation confirmation

8. SHIPMENT APPROVAL

Shipment may proceed only after written approval from the buyer (SUCAFINA). Approval confirms that:

- Analytical results are acceptable
- Traceability is verified
- Organic certification validity is confirmed

9. NON-CONFORMITY MANAGEMENT

9.1 SCENARIO A: Pre-Shipment Non-Compliance

If test results indicate contamination before shipment:

- shipment is not approved as organic
- supplier must identify root cause
- lot must be segregated and reclassified
- replacement organic lot must be re-tested

A corrective action report is required.

9.2 SCENARIO B: Results Above Limits at destination

If testing by authorities or accredited laboratories at destination indicates contamination:

- Shipment is placed under quality and organic status hold
- Supplier and control bodies are notified
- Investigation may include:
- counter-analysis of retained samples
- sampling representativeness review
- traceability verification
- transport contamination risk assessment

Final decision on organic status shall be made in coordination with the competent control body.

10. ALLOCATION OF RESPONSIBILITY

In the unlikely event that contamination affecting organic status is confirmed, both parties shall cooperate to determine the root cause.

Supplier responsibility may apply where it is reasonably demonstrated that:

- the sampled lot was not representative of shipped goods
- contamination occurred prior to transfer of risk
- organic handling or segregation requirements were not followed

This shall not apply where contamination is clearly linked to:

- transport incidents after risk transfer
- actions of buyer-contracted logistics providers
- sampling inconsistencies outside recognized standards

Commercial resolution may include:

- reclassification of product
- financial adjustment reflecting loss of organic value
- coverage of reasonable direct costs

11. SUPPLIER PERFORMANCE EVALUATION

Supplier approval for organic supply will consider:

- history of compliant analytical results
- robustness of internal control systems
- traceability reliability
- responsiveness to corrective actions

Repeated serious non-conformities may lead to reassessment of supplier status.

12. REVISION HISTORY

Version	Date	Changes Made	Approved by
1.0	12/04/2025	Initial creation	Cora Coronel
2.0	03/19/2026	Updated	Cora Coronel