



NKG Supplier Conditions for Food Safety

Requirements for the
Importation of Green Coffee
into the European Union





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This document (hereinafter the “Terms”) contains the requirements that Neumann Gruppe and/or any of its European Union affiliated companies (hereinafter referred to as the “Importer”) demands from all the exporter companies (hereinafter the “Supplier”) with which it has signed, is negotiating or will sign in the future a green coffee sales contract (hereinafter the “Contract”).

1. Objectives and Scope

The purpose of these Terms is the acknowledgment of the requirements and demands that, by European Union Law (of which applicable regulations are listed in Annex 1), the Importer imposes on the Supplier.

The Supplier can decide to use this document for its company and process the information as a supplier declaration.

2. Requirements

The Supplier acknowledges that the following requirements must be considered in order to contract with the Importer:

a) Storage:

In order to prevent the formation of mold and OTA contamination (contamination by Ochratoxin A), suitable actions must be taken to reduce condensation during transport and storage of the green coffee (hereinafter the “Goods”).

b) Radiation:

The Goods must not be treated with ionizing radiation according to Directives No. 1999/2/EC and No. 1999/3/EC.

c) GMO & Allergen Labeling:

The Goods must not be subject to GMO (Genetically Modified Foods) labelling according to Regulation (EC) No. 1829/2003 and Regulation (EC) No. 1830/2003.

In addition, the Supplier must confirm that the Goods do not contain allergens according to Regulation (EU) No. 1169/2011 regarding the provision of food information to consumers.



d) Traceability:

A documented traceability system that allows the Goods to be traced from the pre-supplier until delivery to the customer must be implemented by the Supplier, as required by the General Food Law (Article 18 of the Regulation (EC) No. 178/2002).

In case of product-related emergencies, the Supplier must provide an emergency contact number that guarantees 24-hour availability indicating the following data:

- Company name
- Name person
- Phone contact
- E Mail

e) Food Defense:

The Supplier must assume full responsibility of product protection within their sphere of influence, as well as area of responsibility. In addition, the Supplier must develop a hazard and risk analysis, as well as a plan for hazard prevention. Furthermore, the Supplier's employees are checked for their suitability, skills and qualifications and are trained in the legal requirements and product protection before starting their work.

f) Food Fraud:

A documented food fraud mitigation plan must be developed and implemented to control all identified risks by the Supplier. This plan relates to vulnerability analysis and is reviewed at least annually.

g) Organic:

Organic certified Goods must meet the EU requirements under Regulation (EU) No. 2018/848. Compliance must be controlled on-site, and all stages of production, processing, storage as well as marketing and product have been certified.

h) Mineral oil GMP (Good Manufacturing Practices):

Suitable measures must be taken to reduce mineral oil residues (MOSH - Saturated hydrocarbons / MOAH - Alkylated aromatic hydrocarbons) in the Goods. A solution approach according to the ALARA principle (As Low As Reasonably Achievable) is to be pursued.

**i) Packaging Material:**

The Supplier shall provide a current specification and corresponding declaration of conformity regarding the Packaging material, annually.

The Packaging Material must comply with current Regulations: IJO Standard No. 98-01 revised 2005, Regulation (EC) No. 1935/2004, Commission Regulation (EC) No. 2023/2006 and Commission Regulation (EU) No. 10/2011.

j) Pesticides:

Appropriate measures must be taken to reduce residues of pesticides, plant protection agents (and the like) in the Goods. The delivered Goods comply with the applicable requirements under Regulation (EU) No. 2023/915 and the Regulation (EC) No. 369/2005.

k) Analytical Requirements:

Parameter	Limit	Method
OTA (at place of arrival)	max. 3 µg/kg	(DIN EN 14132)
MOSH	<2.0 mg/kg	(LC-GC/FID)
MOAH	<0.5 mg/kg	(LC-GC/FID)
PAH	Max. 2 µg/kg	(GC/MS)

Parameter	Limit	Method
Glyphosate (organic)	< 0.01 mg/kg	(LC-MS/MS)
Glyphosate (conventional)	< 0.1 mg/kg	(LC- MS/MS)
Chlorpyrifos incl Chlorpyrifos-methyl	< 0.01 mg/kg	(GC-MS/MS)
Imidacloprid	< 0.01 mg/kg	(LC-MS/MS)
Chlothianidin	< 0.05 mg/kg	(LC-MS/MS)
Ethylenoxid incl Sum 2Chlorethanol	< 0.01 mg/kg	(GC-ECD)

l) The Parties agree that the Importer may unilaterally modify these Terms in case of modification or creation of the regulation applicable to the Contract.



Annex 1

Regulation¹

The following rules, as well as their future modifications and amendments, must be considered by the Supplier as indicated in this document.

- Directive 1999/2/EC of the European Parliament and of the Council of 22 February 1999 on the approximation of the laws of the Member States concerning foods and food ingredients treated with ionising radiation.
- Directive 1999/3/EC of the European Parliament and of the Council of 22 February 1999 on the establishment of a Community list of foods and food ingredients treated with ionising radiation.
- Regulation (EC) No 1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed.
- Regulation (EC) No 1830/2003 of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC.
- Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 Text with EEA relevance.
- Regulation (EC) No 178/2002 of the European Parliament and of the Council (General Food Law).
- Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007.
- IJO Standard No. 98-01 revised 2005.
- Commission Regulation (EU) No 10/2011 of 14 January 2011 on plastic materials and articles intended to come into contact with food.

¹ This list of regulations should not be understood as a limited list.



- Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.
- Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC.
- Commission Regulation (EU) 2023/915 of 25 April 2023 on maximum levels for certain contaminants in food and repealing Regulation (EC) No 1881/2006.
- Regulation (EC) no 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin and amending council directive 91/414/EEC.
- Regulation (EU) 2017/625 of the European Parliament and of the Council on official controls and other official activities to ensure the application of food and feed law and rules on animal health and welfare, plant health and plant protection products.
- Commission Regulation (EC) no 2073/2005 Of 15 November 2005 on microbiological criteria for foodstuffs.
- Directive 2009/32/EC of the European Parliament and of the Council Of 23 April 2009 on the approximation of the laws of the member states on extraction solvents used in the production of foodstuffs and food ingredients.
- Commission Regulation (Eu) 2017/2158 Of 20 November 2017 Establishing mitigation measures and benchmark levels for the reduction of the presence of acrylamide in food.
- Commission Regulation (EC) No 369/2005 of 3 March 2005 concerning tenders notified in response to the invitation to tender for the export of oats issued in Regulation (EC) No. 1565/2004.