

Comprehensive Update on European Union Labeling Standards for Coffee and Its By-Products [†]

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Abstract: In the European Union (EU), the labeling of coffee and coffee by-products adheres to comprehensive regulations aimed at ensuring product transparency and consumer safety. According to Regulation (EU) 1169/2011, the mandatory particulars that must appear on coffee labels include the name of the food, the net quantity, the date of minimum durability, and the name and address of the food business operator. For coffee by-products classified as novel foods—those not recognized within the EU prior to 1997—additional stipulations under Regulation (EU) 2015/2283 require a rigorous approval process. This process involves a safety assessment and the possibility of a simplified notification procedure if the product has a history of safe use outside the EU. The already approved novel coffee by-product ingredients such as coffee leaves and cascara (dried coffee cherry pulp) must also adhere to specific labeling requirements, which dictate precise naming conventions and usage categories that align with safety standards and consumer information needs. These detailed labeling requirements are pivotal for maintaining the integrity of coffee products sold within the EU, ensuring that all items, from traditional coffee to innovative coffee by-product-based ingredients, meet the highest standards of safety and consumer information. This article describes from a practical perspective the labeling standards for coffee and coffee by-products, and points out challenges in the implementation of the regulations.

Keywords: coffee; coffee by-products; regulatory aspects; correct labeling; EU food market



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1. Introduction

Apart from the seeds, other parts of the coffee plant (*Coffea* spp.), including the leaves, flowers, and cherries (cascara), can be used for food or other purposes. Unfortunately, these parts are currently being mostly wasted [1]. In several coffee-producing countries, some of these by-products of coffee production are traditionally consumed [2]. Since these products were not consumed in the European Union (EU) before 1997, they are considered to be novel. “Novel foods” refer to foods and food ingredients, which were not used for human consumption to any significant extent in the EU prior to 15 May 1997 [3]. Plant products can be notified as a ‘traditional food from a third country’ following Articles 14 and 15 of Regulation (EU) 2015/2283, if the product has a ‘history of safe food use’ in a non-EU country. The first approvals have already been granted for coffee leaves and for cascara [4–10]. It is of note that another full novel food application for cascara [11] was submitted, positively evaluated by EFSA [5], but terminated because it would have been duplicative of the already granted authorizations as traditional novel food [12].

An overview of the novel food status of coffee by-products in the EU is provided in Figure 1 and Table 1. The aim of this article is to provide a comprehensive update into the regulatory issues of labeling coffee and coffee by-products in the EU with specific regard to the Novel Food Regulation (EU) 2015/2283 [13] and the Food Information Regulation (EU) 1169/2011 [14].

Table 1. Coffee by-products and assessment of their novel food status considering Regulation (EU) No 2015/2283 (updated from Klingel et al. [1] and Lachenmeier et al. [3]).

Coffee By-Product	Novel Food Status ^a	EFSA Opinion	EC Implementing Regulation
Flowers (blossoms)	Probably novel, currently not approved. Some anecdotal evidence for traditional food uses in third country. Needs approval procedure.	-	-
Stems, twigs, and wood	Non-food material, contamination up to certain levels typically tolerated in the trade of green coffee.	-	-
Leaves	Novel, authorization granted for coffee leaves (herbal infusion and beverage uses) based on notification as traditional food from third country [15].	[7]	[6,10]
Coffee cherry materials (husks, cascara, dried or fresh coffee cherries, and coffee pulp or mucilage)	Novel, authorization granted for cascara and cherry pulp (beverage uses) based on notifications as traditional food from third country [16,17].	[8,9]	[4]
Parchment	Probably novel, currently not approved. No application pending. Needs approval procedure.	-	-
Green unroasted beans (seeds)	Probably not novel [18]. The current version of the EU novel food status catalogue eliminated the specific entry for green unroasted beans (for previous 2020 version, see Figure 1 in Klingel et al. [1]). It can be assumed that the new entry for seeds of <i>Coffea</i> spp. as not novel also applies to the green unroasted beans as roasting is not specified in the entry. The classification as not novel would then also apply to the non-selective water extraction made of green unroasted seeds. Selective extracts are probably novel.	-	-
Silver skin	Novel [19]. Probably not a traditional food from third country. Needs full approval procedure.	-	-
Coffee grounds	Not novel (spent coffee grounds, defatted spent coffee grounds, and defatted unused coffee grounds) [20].	-	-
Coffee grounds oil extract	Novel [21]. Probably not a traditional food from third country. Needs full approval procedure.	-	-

^a Authors' judgement considering the EU Novel Food Catalogue and Article 4 consultations. Abbreviations: EU, European Union; EFSA, European Food Safety Authority; EC, European Commission.

Coffea spp.
Common Names FI: Kahvi, BG: Kafe, NL: Koffie (boom), IT: Caffè, PT: Caféiro, cafézeiro, DK, NO, SE: Kaffe, DE: Kaffee (Pflanze), ES: Café, Cafeto, IS: Kaffi, EN: Coffee, GR: Kafea, PL: Kawa, FR: Caféier
Description The entry concerns the seeds of <i>Coffea</i> spp. It also concerns the leaves and dried cherry pulp (cascara) of <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner. Infusion from coffee leaves of <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehne, and dried unroasted coffee cherry pulp (cascara) of <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A.Froehner and its infusion are authorised novel foods.
STATUS Seeds of Coffea spp. NOT NOVEL IN FOOD - According to the information available to the Member States' competent authorities, this product was used for human consumption to a significant degree within the Union before 15 May 1997. Thus, it is not considered to be 'novel' according to the provisions of the Novel Food Regulation (EU) 2015/2283 and its access to the market is not subject to the pre-market authorisation in accordance with Regulation (EU) 2015/2283. However, other legislation may restrict the placing on the market of this product as a food in the EU or in some Member States. Therefore, it is recommended to check with the competent authority(ies) of the Member State(s). Infusion from coffee leaves of Coffea arabica L. and/or Coffea canephora Pierre ex A. Froehne AUTHORISED NOVEL FOOD - This is an authorised novel food and it has been included in the Union list established by Commission Implementing Regulation (EU) 2017/2470. Please see the authorisation for this novel food on the following link (https://ec.europa.eu/food/safety/novel_food/authorisations/union-list-novel-foods_en) to identify under what conditions of use (table 1) and specifications (table 2) this novel food can be placed on the EU market. Dried cherry pulp (cascara) and its infusion from Coffea arabica L. and/or Coffea canephora Pierre ex A.Froehner AUTHORISED NOVEL FOOD - This is an authorised novel food and it has been included in the Union list established by Commission Implementing Regulation (EU) 2017/2470. Please see the authorisation for this novel food on the following link (https://ec.europa.eu/food/safety/novel_food/authorisations/union-list-novel-foods_en) to identify under what conditions of use (table 1) and specifications (table 2) this novel food can be placed on the EU market.
Roasted silver skin of coffee beans (testa of coffea sp.)
Description The entry concerns Roasted silver skin of coffee beans (testa of coffea sp.). According to the conclusion reached by the German federal states' authorities in response to a request submitted pursuant to the requirements of Commission Implementing Regulation (EU) 2018/456 (https://ec.europa.eu/food/safety/novel_food/consultation-process_en) on the procedural steps of the consultation process for determination of novel food status, Roasted silver skin of coffee beans (testa of coffea sp.) is considered novel food .
STATUS Roasted silver skin of coffee beans NOVEL FOOD - According to the information available to Member States' competent authorities, this product was not consumed in the EU to a significant degree as a food before 15 May 1997. Therefore, a pre-market authorisation in accordance with Regulation (EU) 2015/2283 is required before it can be placed as food on the EU market.
Spent coffee grounds, defatted spent coffee grounds and defatted unused coffee grounds
Description The request concerns the use of spent coffee grounds, defatted spent coffee grounds and defatted unused coffee grounds (from Coffea sp., mainly Coffea arabica L. and Coffea canephora (Robusta)). According to the conclusion reached by the Danish competent authorities (Danish Veterinary and Food Administration) in response to a request submitted pursuant to the requirements of Commission Implementing Regulation (EU) 2018/456 (https://ec.europa.eu/food/safety/novel_food/consultation-process_en) on the procedural steps of the consultation process for determination of novel food status, spent coffee grounds, defatted spent coffee grounds and defatted unused coffee grounds (from Coffea sp., mainly Coffea arabica L. and Coffea canephora (Robusta)) is considered not novel in food.
STATUS Whole NOT NOVEL IN FOOD - According to the information available to the Member States' competent authorities, this product was used for human consumption to a significant degree within the Union before 15 May 1997. Thus, it is not considered to be 'novel' according to the provisions of the Novel Food Regulation (EU) 2015/2283 and its access to the market is not subject to the pre-market authorisation in accordance with Regulation (EU) 2015/2283. However, other legislation may restrict the placing on the market of this product as a food in the EU or in some Member States. Therefore, it is recommended to check with the competent authority(ies) of the Member State(s).

Figure 1. European Union (EU) Novel Food Status Catalogue Entries for Coffea, Roasted Silver Skin and Spent Coffee Grounds (accessed on 25 April 2024) [18].

2. Regulations for Coffee Leaves

Coffee plants need regular pruning on the plantation, which produces large amounts of leaves on a regular basis. These leaves are an obvious by-product. In some coffee-producing countries, there has been and still is a tradition of using coffee leaves as a type of tea. Specifically, the dried leaves are infused with water [1]. From a sensory perspective, coffee leaf tea is more similar to green tea rather than black tea [22]. The EU has provided some standards within the novel food approval process (see Table 2).

Table 2. Specifications of Commission Implementing Regulation (EU) 2020/917 and amendments in Commission Implementing Regulation (EU) 2023/931 authorizing the placing on the market of infusion from coffee leaves as a traditional food from a third country [6,10].

Authorized Novel Food	Infusion from Coffee Leaves of <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner (Traditional Food from a Third Country)
Specified food category	Infusion from coffee leaves of <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner placed on the market as such; Flavored and unflavored non-alcoholic ready-to-drink beverage; Coffee, coffee and chicory extracts, instant coffee, tea, herbal- and fruit-infusions, coffee substitutes, coffee mixes and instant mixes for beverages (and their flavored counterparts).
Additional specific labeling requirements	The designation of the novel food on the labeling of the foodstuffs containing it shall be ‘Infusion from coffee leaves’ or ‘Dried infusion from coffee leaves’, depending on the form to be marketed.
Description/definition	The traditional food consists of an infusion of leaves from <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner (family: <i>Rubiaceae</i>). The traditional food is prepared by mixing a maximum of 20 g of dried leaves from <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner with 1 L of hot water. Leaves are removed and the infusion is then subjected to pasteurization (at least 71 °C for 15 s).
Composition	Visual: brown green liquid
	Odor and taste: characteristic
	Chlorogenic acid (5-CQA): <100 mg/L
	Caffeine: <80 mg/L
Microbiological criteria	Epigallocatechin gallate (EGCG): <700 mg/L
	Total plate count: <500 CFU/g
	Total yeast and mold count: <100 CFU/g
	Total coliforms: <100 CFU/g
	<i>Escherichia coli</i> : absence in 1 g
Heavy metals	<i>Salmonella</i> : absence in 25 g
	Lead (Pb): <3.0 mg/L
	Arsenic (As): <2.0 mg/L
	Cadmium (Cd): <1.0 mg/L

Abbreviations: CFU, colony-forming unit.

3. Regulations for Coffee Cherry (Cascara)

Cascara is the common Spanish name for products obtained from coffee cherries, usually sold in a dehydrated state [1]. Cascara can be obtained through either wet or dry processing. Within the EU, dried cherry pulp and its infusion from both *Coffea arabica* and *Coffea canephora* are authorized as traditional foods from a third country. The specifications of the authorization are listed in Table 3.

Table 3. Specifications of Commission Implementing Regulation (EU) 2022/47 authorizing the placing on the market of *Coffea arabica* L. and/or *Coffea canephora* Pierre ex A. Froehner dried cherry pulp and its infusion as a traditional food from a third country [4].

Authorized Novel Food	<i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner Dried Cherry Pulp and Its Infusion (Traditional Food from a Third Country)
Specified food category	Coffee cherry pulp from <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner for the preparation of infusions; Coffee, coffee and chicory extracts, instant coffee, tea, herbal- and fruit-infusions, coffee substitutes, coffee mixes and instant mixes for hot beverages (and their flavored counterparts); Flavored and unflavored non-alcoholic ready-to-drink beverages.
Additional specific labeling requirements	The designation of the novel food on the labeling of the foodstuffs containing it shall be “coffee cherry pulp” and/or “cascara (coffee cherry pulp)”, and/or “coffee cherry pulp infusion” and/or “coffee cherry pulp dried infusion”. If the product containing the novel food contains more than 150 mg/L of caffeine (as such or after reconstitution), it shall be labeled with the following indication: “High caffeine content. Not recommended for children or pregnant or breast-feeding women” in the same field of vision as the name of the food, followed by the caffeine content expressed in mg per 100 mL. Typical infusion preparations are prepared with up to 6 g of coffee cherry pulp per 100 mL of hot water (>75 °C). For the coffee cherry pulp placed on the market as such for the preparation of infusions, instructions shall be given to the consumer on the preparation.
Description/definition	The traditional food consists of the dried unroasted coffee cherry pulp of <i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner (genus: <i>Coffea</i> family: <i>Rubiaceae</i>) and its infusion. The infusion can be used as such or concentrated or dried. Ripe coffee cherries are collected, and then the coffee beans are mechanically removed, prior or after a drying process, leaving the dried coffee cherry pulp, which can be milled to a powder. The separated coffee cherry pulp is also known as “cascara”, from the Spanish “cáscara”, meaning “husk”. Typically, the infusion is prepared by mixing up to 6 g of cascara pulp or husk in 100 mL of hot water (>75 °C) for a few minutes and then pouring through a strainer, or using corresponding amounts in dried or instant infusions.
Composition	Water: <18%
	Water activity (aw): ≤0.65
	Ash: <10.4% DM
	Protein: <15% DM
	Fat: <5% DM
Microbiological criteria	Carbohydrates: <85% DM
	Aerobic Plate Count: <104 CFU/g
	Total yeasts and molds: <100 CFU/g
	Enterobacteriaceae: <50 CFU/g
	Salmonella: Absence in 25 g
Mycotoxins	Bacillus cereus: <100 CFU/g
	Ochratoxin A: <5.0 µg/kg
	Aflatoxin B1: <2.0 µg/kg
	Aflatoxin B1. B2. G1. G2 (as sum): <4.0 µg/kg

Table 3. Cont.

Authorized Novel Food	<i>Coffea arabica</i> L. and/or <i>Coffea canephora</i> Pierre ex A. Froehner Dried Cherry Pulp and Its Infusion (Traditional Food from a Third Country)
Heavy metals	Cadmium (Cd): <0.05 mg/kg
	Lead (Pb): <1.0 mg/kg
	Copper: ≤50 mg/kg
	Mercury: ≤0.02 mg/kg
	Arsenic: ≤0.2 mg/kg
Impurities	Benzo(a)pyrene: <10.0 µg/kg
	Sum of benzo(a)pyrene, benz(a)anthracene, benzo(b)fluoranthene and chrysene: <50.0 µg/kg
Pesticides	Pesticide levels in the traditional food shall comply with levels set by Regulation (EC) No 396/2005 for “0639000” for “Herbal infusions from any other parts of the plant”.

Abbreviations: CFU, colony-forming unit; DM, Dry Matter.

4. General Labeling Requirements of Foods Based on Coffee and Coffee By-Products in the EU

Regulation (EU) No 1169/2011, also known as the Food Information Regulation, regulates all information about food, whether it be labeling, presentation or advertising—including verbal advertising [14]. The main objectives of the Regulation are to standardize food information and harmonize labeling law across Europe, to improve the legibility and comprehensibility of labels and to protect consumers from being misled.

Article 9 (1) (a)–(k) of the Food Information Regulation contains a list of mandatory food information. This information must be provided to the end consumer in the case of pre-packaged food.

When labeling pre-packaged foods for example coffee or coffee leaf tea, the following mandatory elements must be indicated on the label:

- the name of the food (for by-products according to the designation in the Novel Food approvals [23])
- the net quantity of the food
- the date of minimum durability /lot labeling (in accordance with the Directive 2011/91/EU [24])
- instructions for use if necessary (such as the preparation of a coffee leaf tea with the required pasteurization or infusion)
- the name or business name and the address of a food business operator

These mandatory labeling elements must be applied directly to the packaging or, in the case of pre-packaged food, to a label attached to the packaging. They must be written in an easily understandable language (e.g., in Germany only German language is allowed) and affixed in a conspicuous place in a clear, legible and, where necessary, indelible manner. The name and the net quantity must be indicated in the same field of vision. Legibility must be ensured by a prescribed minimum font size of 1.2 mm for small letters (x-height), see Figure 2.

If the food does not consist of a single ingredient (such as pure coffee or pure cascara), a list of ingredients, a quantitative indication of ingredients (e.g., ingredients that appear in the name of the food), a nutrition declaration (except herbal and fruit infusions, tea, decaffeinated tea, instant or soluble tea or tea extract, decaffeinated instant or soluble tea or tea extract, which do not contain other added ingredients than flavorings which do not modify the nutritional value of the tea) and an indication of substances that cause allergies and intolerances, may also be required. This information is required, for example, for flavored and non-flavored non-alcoholic ready-to-drink beverages, or instant powder mixes with sugars or milk (i.e., basically all products except pure infusions).

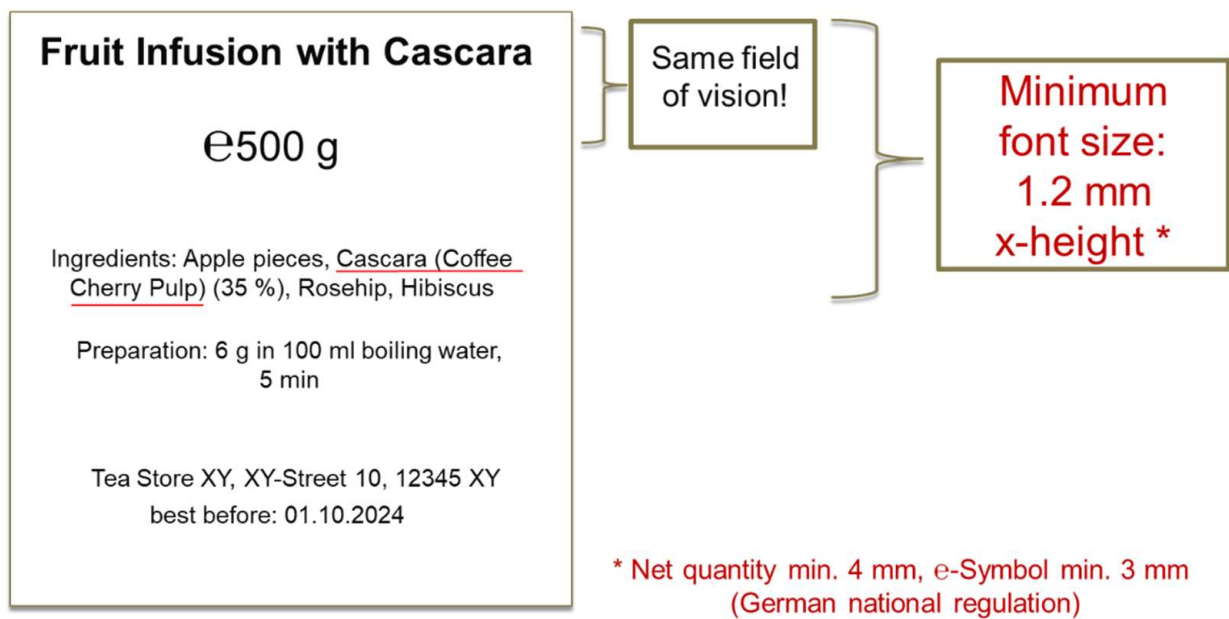


Figure 2. Mandatory food labeling elements in an example of a fruit infusion with cascara. The red underlined element shows the correct designation of the novel food.

Examples of correctly declared products with cascara and coffee leaf tea are given in Figures 3 and 4.



Figure 3. Example label (in German) for an alcohol-free beverage containing cascara. The mandatory designation “coffee cherry pulp infusion” (German: Aufguss aus der Pulpe der Kaffeeekirsche) is correctly stated in the ingredients lists. (a) front label; (b) back label. Used with permission from Nadia Schweizer & Marc Steger GbR, Waiblingen, Germany, ©2023.

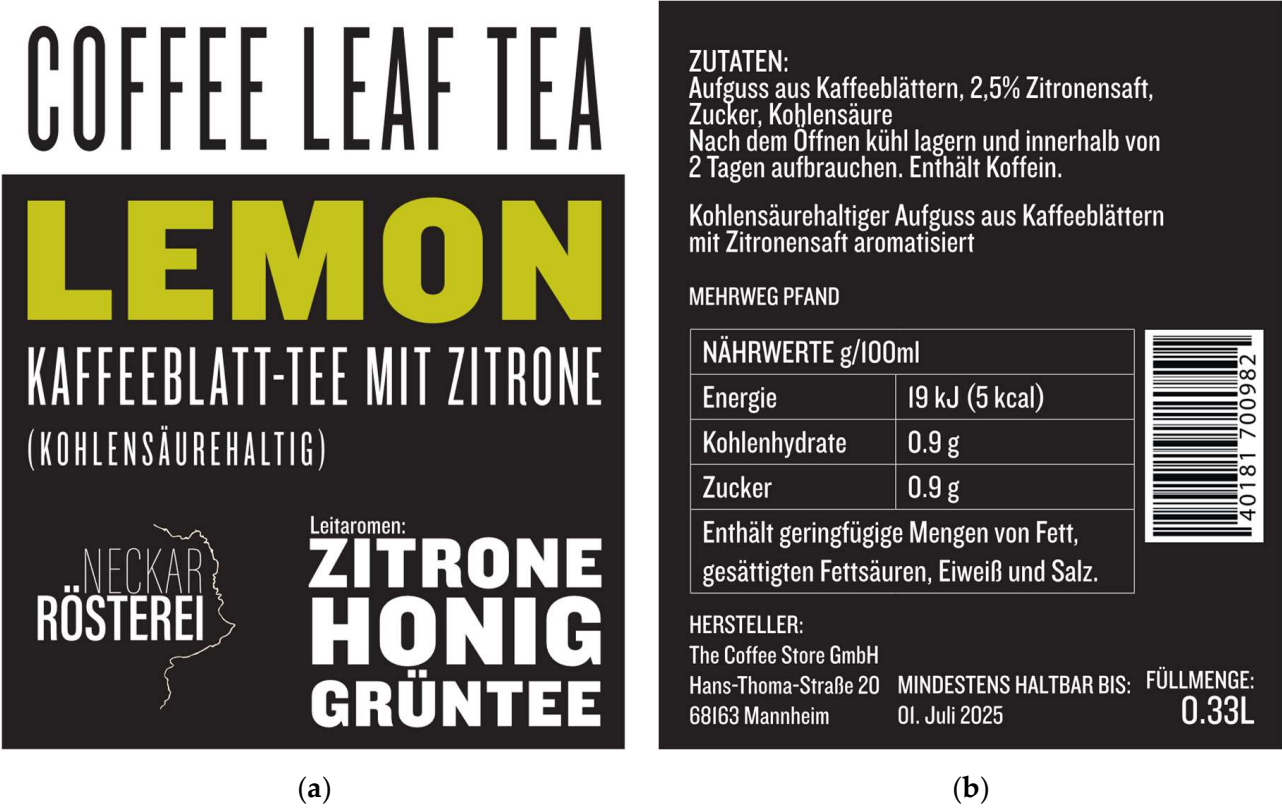


Figure 4. Example label (in German) for a carbonated coffee leave infusion with lemon juice and sugar. The mandatory designation “infusion from coffee leaves” (German: Aufguss aus Kaffeeblättern) is correctly stated in the ingredients lists. **(a)** front label; **(b)** back label. Used with permission from The Coffee Store GmbH, Mannheim, Germany, ©2024.

5. Some Specific Details for Mandatory Labeling Elements

The individual mandatory labeling elements are explained in more detail in the following:

5.1. Name of the Food

This term primarily refers to the legal name. Fantasy names or trademarks cannot replace the designation. In Germany, the designation for coffee products is prescribed in national law and the terms defined there must be used. For unroasted coffee, the designation “green coffee” is prescribed. For roasted coffee, the legal name “roasted coffee” or “coffee” must be used [25]. The legal designation name of the authorized novel foods in the EU list are given in Tables 2 and 3. For challenges in practical implementation, see Section 6.

5.2. Net Quantity

The net quantity must be expressed in kilograms or grams, whichever is appropriate. It should be noted that, according to the German national packaging regulation, the filling quantity must be printed in a larger minimum font size than the other information (up to 50 g: 2 mm; up to 200 g: 3 mm; up to 1 kg: 4 mm; more than 1 kg: 6 mm). The EEC symbol (stylized small e) can be affixed in the same field of vision as the net quantity (the prescribed specification for the symbol must be observed, see Annex 9 of German national packaging regulation, Unicode symbol U+212E, minimum font size 3 mm) [26].

5.3. Minimum Durability Date/Lot Labeling

The date of minimum durability is the date until which this food retains its specific properties, such as sensory characteristics (appearance, odor, taste), acceptable microbiological condition and quality parameters such as nutrient content, when properly stored. A certain loss of quality parameters shortly before the expiry of the best-before date is acceptable. The indication of the date is preceded by “best before. . .”, if the day is mentioned and “best before end . . .” in the other cases. This is followed by either the date itself or a reference to where the date can be found in the labeling (e.g., “see bottom of package”). Other indications besides “best before” or abbreviations cannot replace the prescribed wording. If the best before date is indicated with day, month and year, this information is sufficient as lot identification. Otherwise, an additional lot identification according to Directive 2011/91/EU would be required (e.g., L12345) [24].

5.4. Instructions for Use

The instructions for use of a food shall be written in such a way as to enable the food to be used in an appropriate manner. In the case of tea, the dosage and brewing time must be indicated. For coffee leaf tea, the novel food implementing regulation also prescribes a mandatory minimum temperature for the water, in which the coffee leaves are infused.

5.5. Name or Business Name and Address of a Food Business Operator

The responsible person for food information is the food business operator under whose name or business name the food is marketed or, if that operator is not established in the EU, the importer who imports the food into the EU. This information is intended to enable consumers and food control authorities to identify the persons responsible and to contact them in writing. In principle, a complete address with street, house number and postal code is therefore necessary.

6. Challenges in Labeling of Foods Containing Coffee By-Products

The implementation of EU novel food regulations for coffee by-products such as coffee cherry and coffee leaves presents several labeling challenges. For instance, the required designation “dried infusion from coffee leaves” on products containing only the solid leaves in a tea mix does not make intuitive sense. This term typically implies a brewed product, not dry leaves. Such regulatory terms could lead to confusion about the product’s actual contents, suggesting the need for clearer, more logical labeling that accurately describes the form and use of the product.

These misinterpretations could have been arisen due to translation inconsistencies across EU languages, where terms like “infusion” might be more accurately replaced with “tea” (e.g., in German language, “tea” but not “infusion” is used for tea leaves before brewing) for clearer consumer communication. Similarly, cascara from dry processing encounters issues with the designation “pulp,” as it inaccurately describes the entire dried husk, including peel and parchment. The authors propose practical labeling suggestions in a teleological interpretation of the EU regulations to address these ambiguities, ensuring both compliance and clarity for consumers (Table 4).

Table 4. Challenges in interpretation the labeling requirements for coffee by-products and teleological suggestions for their solution.

Product Group	Legal Designation According to Commission Implementing Regulation (EU) 2017/2470 [23]	Comments about Issues in Interpreting the Commission Implementing Regulation (EU) 2017/2470 [23]	Teleological Suggestion for Labeling ^a
Coffee leaves as such	Dried infusion from coffee leaves	The legal designation makes no sense for dried leaves as such. In the strictest legal interpretation, only the “infusion” would be able to be imported into the EU. There may be a translation error, i.e., in some languages “infusion” may also refer to the solid herbal plant material. Infusion may have been used, as the word “tea” is often believed as only appropriate for infusions of <i>Camelia sinensis</i>. For example, the German word “Kräutertee” is a correct designation also for the herbs as such. Hence the term “infusion of coffee leaves” may have been inappropriately translated to “Aufguss aus Kaffeeblättern”, while the translation “Kaffeeblatt-Tee” may have been more appropriate, which would holistically include both solid tea leaves as well as the beverage prepared in the form of an aqueous infusion.	Front label: Coffee leaf tea Back label: Coffee leaves for preparation of an infusion (same field of vision as net quantity)
Coffee leaves as an ingredient in flavored and unflavored non-alcoholic ready-to-drink beverages	“Infusion from coffee leaves” in the list of ingredients	-	-
Coffee leaves as an ingredient in instant mixes for beverages	“Dried infusion from coffee leaves” in the list of ingredients	-	-
Cascara from dry processing (dried coffee cherry)	“Coffee cherry pulp” and/or “cascara (coffee cherry pulp)”	The legal designation “pulp” is not completely correct for cascara from dry processing (dried husks containing the peel, pulp, and parchment)	Front label: Cascara or Coffee cherry Back label: “Coffee cherry pulp” and/or “Cascara (coffee cherry pulp)”, and/or “Coffee cherry pulp infusion” and/or “Coffee cherry pulp dried infusion” (same field of vision as net quantity)
Cascara from wet processing (dried cherry pulp)			
Cascara as an ingredient in flavored and unflavored non-alcoholic ready-to-drink beverages	“Coffee cherry pulp infusion” and/or “coffee cherry pulp dried infusion” in the list of ingredients	-	-

^a Authors’ judgement considering the EU Novel Food implementing regulations.

7. Voluntary Labeling Claims and Online Commerce

Claims that go beyond the mandatory elements discussed so far are voluntary for prepackaged coffee or coffee by-products. However, it is imperative to ensure that the voluntary claims do not mislead or deceive the consumer. For example, a product with a claim of “100% Arabica coffee” must, of course, include only the specified type of coffee [27]. Blending with *Coffea canephora* coffee is not permitted in that case, even in small proportions. Voluntary indications of origin and variety (e.g., Pacamara from Mexico) or certain processings (pulped natural etc.) must also correspond to the facts. In particular, it is not permitted to advertise a better quality than the actual quality.

Finally, it is pointed out that all health claims applied for under the Health Claims Regulation [28] (e.g., relating to antioxidants or caffeine) have not been approved for coffee and it is therefore not permissible to make health claims for coffee or its by-products. In the case of a voluntary use of nutrition claims, the requirements of the Health Claims Regulation [28] and Food Information Regulation [14] with regard to the declaration of nutritional values must be observed.

Furthermore, according to the Food Information Regulation [14], all mandatory labeling elements, with the exception of the date of minimum durability, must be available before the conclusion of the sales contract for products that are sold via distance selling (e.g., in Internet commerce). This means that if roasting companies sell coffee products via their own homepages, the mandatory food information must be made available directly on the product description pages or via simple links (e.g., photo of the label). Further legal requirements for online sales (e.g., basic price information, information and registration obligations) must be considered.

8. Conclusions

Coffee leaf and cascara have been approved as traditional food from a third country in the EU as coffee by-products under the Novel Food Regulation. Coffee leaves and coffee cherry pulp may currently only be used to prepare beverages, even though they have the potential to be used as ingredients in other food products, such as bread, to increase protein content. From a sustainability perspective, coffee by-products should be allowed in other food categories in the EU in the future. The inconsistent designations such as “dried infusion from coffee leaves” and “coffee cherry pulp dried infusion” in the Commission Implementing Regulation (EU) 2017/2470 [23] need to be revised in the regulations. Hopefully, food industry will make novel food applications to extend the current categories of the approved by-products, as well as new applications for the remaining unapproved by-products, such as flower, silver skin, parchment or oil.

Supplementary Materials: The following supporting information can be downloaded at: <https://www.mdpi.com/article/10.3390/ICC2024-17350/s1>, Presentation file (pdf-format).

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as tool in referencing by converting the various reference sources into BibTeX format for further processing with Zotero v. 6.0.36.

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