Statement by the INKOTA network, DUH, Coffee Watch and PAN UK on the BfR response to our Pesticides report

We at Coffee Watch, Deutsche Umwelthilfe, the INKOTA network, and Pesticide Action Network UK, published a report called "Poison in Your Coffee" on 19th June, 2026, about how the coffee industry's pesticide addiction is harming workers, farming communities, and ecosystems. It also exposes how residues of cocktails of pesticides on coffee end up in consumers' cups. This report received widespread media coverage.

On July 9th, the German Federal Institute for Risk Assessment (Bundesinstitut für Risikobewertung (BfR)) published a statement in response to our report, entitled "Pesticides in coffee: 'Banned' and 'highly toxic'?" In this response, the BfR adopts an alleged toxicological lens to urge a "more objective" debate, challenging various parts of our report.

However, we believe that at crucial points the BfR assessment remains incomplete, misrepresents important aspects, is at times misleading, and in places relies on insufficient data to support the conclusions drawn.

1) **The BfR's statement downplays the toxicity of active substances banned in Europe.**

We identified 159 active substances in coffee pesticides. Almost half of all these are no longer authorized in the EU, the vast majority because of unacceptable health and/or environmental risk.

The German Federal Institute for Risk Assessment (BfR) acknowledges that an EU ban can have various causes. But the BfR suggests that some substances may simply have little practical use in Europe, since climatic conditions — and consequently the pest species present — differ from those in coffee-growing regions. It also suggests it is possible that marketing a substance in the EU isn't profitable enough for the manufacturer, so no application for approval was ever submitted. But the crucial point remains: all of these active substances were previously authorized in the EU, and most were banned. In fact, they were mostly banned *because of their toxicity* — not because an application was simply never filed. For example:

- Chlorpyrifos was banned due to its proven neurotoxic effects on children.
- Neonicotinoids were banned because of their toxicity to bees.
- Several fungicides commonly used in coffee but banned in Europe were banned because of their reproductive toxicity.

These are bans grounded in explicit health and environmental concerns — so the BfR's suggestion that the real issue may simply be a lack of practical relevance or commercial interest in the EU, rather than toxicity, is misleading.

When a company doesn't apply for renewed approval in light of new toxicological findings or major campaigns to ban a pesticide, it's usually because doing so would be futile anyway.

This point is in fact central to one of the most pressing debates facing Europe today: the debate in the EU Commission over indefinite, unlimited approvals for pesticides. Without regular review requirements, active ingredients whose harmfulness only becomes apparent post-approval would stay on the market indefinitely.

In short: these pesticides are banned because of unacceptable risk — not because companies simply had no commercial need to reapply for registration.

2) **The BfR's statement on the safety of possible residues in coffee is misleading.**

The BfR's claim that coffee is safe to drink in Germany, in terms of pesticide residues, is based mainly on one assumption: it stays within the legal residue limits (MRLs). However, two things are overlooked here:

I. how little coffee is actually tested, and
II. how much the MRL itself is a trade policy measure rather than a purely health-based one.

Our intention is not to spread groundless fear – but the available data clearly justifies far more caution than current communication suggests. Our report "Poison in Your Coffee" details this, and recent research by the Süddeutsche Zeitung confirms precisely this picture for Germany.

- Controls on coffee imports are minimal, yet pesticide residues, including glyphosate and other highly hazardous pesticides (HHPs), are regularly detected on raw coffee beans.
- In 2022, EU authorities examined only 44 samples of raw coffee, 23% of which contained pesticides banned in the EU – a tenfold increase since 2011. Such a small sample size for a global market with millions of tons of imports is no basis for a statement about safety; rather, it shows how inadequate the monitoring actually is.
- Between 2020 and 2024, pesticides were the most frequently reported risk associated with coffee in the European Rapid Alert System for Food and Feed (RASFF), and coffee itself was among the most frequently reported products overall, hardly compatible with the term "safe".

It is notable that the BfR appears to only reference *acute* poisoning effects of pesticides. This implicitly downplays the widely documented potential of serious *chronic* health effects.

It’s important not to ignore the potential for serious chronic health effects from pesticide exposure.We know farmers and farmworkers apply pesticides repeatedly, year in year out. While ‘it’s the dose that makes the toxin’ is true, identifying exposure doses for chronic toxicity is complicated, and even more so with the potential for interactions among multiple chemicals. For chemicals such as carcinogens, genotoxins, repro-toxins and endocrine disruptors, the methods to identify a ‘safe’ exposure dose can be misleading. For example, extrapolating the results of high-dose exposure tests to low-level exposures can be inaccurate, or *in vitro* tests on cells, may miss pathways to toxicity at the whole organism level.Our research was reinforced by recent research from the Süddeutsche Zeitung:

- According to an analysis commissioned from the Federal Office of Consumer Protection and Food Safety (BVL), only 57 coffee samples were tested in Germany

over the past 5 years, even though 15,000 to 18,000 food products are tested for pesticides annually. Despite consumption by millions, coffee is hardly ever monitored.

- Residues were found in 23 of these 57 samples. The BVL lists eight active substances, now banned in the EU, that were nevertheless detected for the period 2020–2024, including chlorpyrifos, clothianidin, imidacloprid, and thiamethoxam.
- In 2023, a sample containing chlorpyrifos residues was even flagged in Rostock, but this had no consequences for the distributors.

The figure cited by the BfR that only 2 to 3% of green coffee samples exceed the MRL (Maximum Residue Level) – thus answers a different question than what it purports to answer. Compliance with an MRL says nothing about whether an active substance is present at all, but only whether it is below a limit value that is often determined by trade policy.

In its analysis of EFSA monitoring data from 2022, PAN Europe detected residues of at least 69 pesticides, classified as hazardous and banned in the EU, in European food products. For at least 60 of these active substances, the maximum residue levels for certain imported foods were even deliberately set above the detection limit in order not to disrupt international trade – a direct contradiction to the BfR's assertion that an MRL is always based solely on a health risk assessment.

3) **BfR ignores that washing and roasting coffee do not provide reliable protection from pesticide residues.**

The BfR correctly states that roasting and brewing alter residue levels, "varying depending on the active ingredient"—this is already more cautiously worded than the German Coffee Association's claim that residues are "almost completely" broken down. However, even this more cautious wording overlooks the fact that low-volatility and thermally stable compounds can and do survive processing, while monitoring remains inconsistent. The few existing residue studies are therefore cause for concern.

- 19% of the raw coffee samples from Brazil, Colombia and Kenya show pesticide residues.
- 72% of roasted coffee in the USA contained AMPA, a breakdown product of glyphosate, proof that an active ingredient can change during roasting without automatically guaranteeing safety: breakdown products are not inherently harmless, as AMPA itself demonstrates.
- 21% of the roasted coffee samples tested in Egypt contained residues, with chlorpyrifos, imidacloprid and cypermethrin being among the most common.

4) **BfR ignores how multiple residues in coffee develop into a " Toxic Cocktail."**

BfR refers to a "wealth of scientific findings" that "sufficiently rule out" health risks from multiple residues. This formulation exaggerates the actual state of research. Cumulative risk assessments for real combinations of active ingredients are an area where European regulatory practice itself admits significant methodological gaps – single-substance assessments remain the norm, not the combined effect of several substances present simultaneously.

Our report documents multiple residues in up to 79% of the roasted coffee samples examined.

This discrepancy between regulatory assessment practice and the reality of the actual mixtures of active ingredients found should be addressed, instead of being closed off with a blanket reference to "good toxicological practice."

5) **BfR ignores the risks pesticides pose to coffee farmers and ecosystems.**

It is understandable that BfR primarily focuses on the safety of coffee for German consumers. However, we would like to emphasize that our report primarily addresses the precarious growing conditions of the farmers and farmworkers on the ground, those who produce the coffee drunk in Germany and worldwide, and the serious consequences for their health, the health of their families and of the environment. Ignoring health risks to millions of farmers and farmworkers creates an incomplete and misleading understanding of what makes coffee "safe" in Germany. We would like to ask BfR: Safe for who?

Conclusion

The BfR statement about our report provides important distinctions regarding why certain active substances are not approved in the EU – however, this distinction must not be used to collectively downplay the problems associated with substances actually used in coffee cultivation. These are explicitly prohibited for health and environmental reasons. The data basis used by the BfR to reassure the public – a few dozen samples, compliance with maximum residue limits (MRLs) rather than the presence of active substances, and no information on multiple residues – does not support the statement "coffee is safe."

We invite the BfR to a discussion with us to clarify their and our positions and ask them to move forward on this important issue, and play a role in much-needed reforms.