

GENERAL GUIDELINES FOR LABELING ROASTED HAWAII-GROWN COFFEE

NOTE: This is a guideline only. Its purpose is to provide several examples of the Hawaiian coffee labeling requirements that may clarify some of the difficult to grasp details used in the legal language of the statute.

There are two Hawaii coffee labeling statute changes that have taken effect in July of 2024.

- 1) (Act 211 signed on 5 July 2023) became enforceable on 1 July 2024. The key changes are:
 - The scope of products covered by the statute has expanded.
In addition to Roasted and Instant coffee products now • Ready-to-Drink beverages, • single brew - complimentary coffee pouches provided by transient accommodation facilities (such as resorts, hotels, B&B's) are covered.
 - For coffee blends the identity statement must list the contributing weight % of beans from each geographical region they originate from. The sum of the weight %'s must total 100%.
(special exceptions will allow consolidating multiple geo-location names)
 - To use "ALL HAWAIIAN" in advertising a product, now requires the coffee beans to be 100% produced and processed (including any decaffeination) in Hawaii.

- 2) Act 198 was signed on 3 July 2024 and became effective on 1 July 2024. This change requires coffee blends to contain a minimum of 51% Hawaiian coffee in the blend. Compliance must be implemented by 1 July 2027.

In addition to all other labeling requirements, all roasted coffee, instant coffee, or ready-to-drink coffee beverages that are produced in whole or in part from Hawaii-grown and Hawaii-processed coffee beans regardless of whether the package or inner wrapper is intended to be individually sold, shall meet the labeling and advertising requirements provided in section 486-120.6, Hawaii Revised Statutes. The following is a guideline for these requirements.

WORDING OF THE IDENTITY STATEMENT

1. **100% Hawaii-grown and Hawaii-processed coffee from a single geographic origin within the State of Hawaii:** The identity statement shall consist of the single geographic origin of the Hawaii-grown and Hawaii-processed coffee (of green coffee beans from one geographic origin) followed by the word "coffee". "100%" may be used immediately preceding the geographic origin. The following examples are based upon the geographic regions defined in chapter 143, Hawaii Administrative Rules (HAR). (Note: If a geographic origin is used in labeling or advertising roasted or instant coffee, the green coffee beans used in that roasted or instant coffee must meet the grade standard requirements provided in HAR chapter 143.)

Examples: HAMAKUA COFFEE	or	100% HAMAKUA COFFEE
KA'U COFFEE	or	100% KA'U COFFEE
KAUAI COFFEE	or	100% KAUAI COFFEE
KONA COFFEE	or	100% KONA COFFEE
MAUI COFFEE	or	100% MAUI COFFEE

MEASUREMENT STANDARDS MAIN OFFICE

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MOLOKAI COFFEE or 100% MOLOKAI COFFEE
OAHU COFFEE or 100% OAHU COFFEE
HAWAII COFFEE or 100% HAWAII COFFEE
HAWAII ISLAND COFFEE or 100% HAWAII ISLAND COFFEE

2. **100% Hawaii-grown and Hawaii-processed coffee when the State of Hawaii is designated as the geographic origin:** If the geographic origin is the State of Hawaii, the identity statement shall be as follows:

Examples: HAWAII COFFEE or 100% HAWAII COFFEE
HAWAIIAN COFFEE or 100% HAWAIIAN COFFEE

3. **100% Hawaii-grown coffee consisting of coffee from several geographic origins in the State of Hawaii:** Use of the phrase "ALL HAWAIIAN" may be used if 100% of the product has been made with Hawaii-grown and Hawaii-processed coffee consisting of coffee from multiple geographic origins in the State of Hawaii: The identity statement shall consist of the percent coffee by weight of one of the Hawaii- grown coffees used, followed by the geographic origin of that Hawaii-grown coffee, and the terms "coffee" and "all Hawaiian" as follows:

Compliant Example (processed in Hawaii): 30% KAUAI COFFEE ALL HAWAIIAN

Compliant Example (not processed in Hawaii): 30% KAUAI COFFEE
Contains: **70%** Hawaiian-grown Coffee

Non-Compliant Example using "ALL HAWAIIAN" when not processed in Hawaii:
when decaffeinated outside of Hawaii.

30% KAUAI COFFEE ALL HAWAIIAN
(Rosted & Packaged by XYZ Company, Compton, CA)

100% HAWAIIAN COFFEE ALL HAWAIIAN
(Rosted & Packaged by XYZ Company, Compton, CA)

Use of "ALL HAWAIIAN" not allowed as coffee was not processed in Hawaii.
this includes non-Hawaiian decaffeination processing.

4. **Coffee blends of Hawaii-grown coffees with coffee not grown in Hawaii.** The Identity statement shall consist of two lines, the first containing the per cent coffee by weight of one of the Hawaii-grown coffees in the blend, followed by the geographic origin of that Hawaii-grown coffee, and the term "coffee blend"
The second line shall have "Contains:" followed in descending weight % order a list for the balance of the weight % contribution and geolocation region name separated by commas the list of bean location sources used in the coffee blend. The sum of all weight %'s must equal 100%. You may use the aggregate term "Foreign-Grown" and no other, in place of individually listing the geolocation names for the balance of the weight% blends.

"Coffee Blend": refers to coffee consisting of a blend of one or more Hawaii-grown coffees with foreign grown coffee.

Example: 20% OAHU COFFEE BLEND
Contains: 50% Columbian, 30% Costa Rica Coffee
or an aggregate phrase
Contains: 80% Foreign-grown Coffee

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TYPE SIZE REQUIREMENTS FOR THE IDENTITY STATEMENT. - Provided that the quantity statement follows all labeling requirements, the quantity statement on the package determines the type size of the identity statement. HRS Sec. 486-120.6(a)(3) also requires each word or character in the identity statement to be of the same type and size.

1. If the net weight is **16 ounces or less**: The type size of the letters or characters in the first line of the identity statement shall be at least one and one-half times the type size required for the quantity statement or three-sixteenth inch in height, whichever is smaller. For coffee blends (more than one geographical origin bean source) the second lines minimum lettering height shall be at least half the first identity line's lettering height.
2. If the net weight is over 16 ounces: The type size of the letters or characters in the first line of the identity statement shall be at least one and one-half times the type size required for the quantity statement. For coffee blends (more than one geographical origin bean source) the second line's minimum lettering height shall be at least half the first identity line's lettering height.
3. If upper- and lower-case letters are used in the identity statement, the lower-case letters shall meet this type size requirement.

PLACEMENT, PROMINENCE, AND INTERVENING MATERIAL

1. Placement: The identity statement shall be in a position above the quantity statement on the principal display panel (PDP) of the package.
Note: the PDP refers to the container packaging surface area that faces the customer- not the area of an adhesive attached printed label.
2. Prominence: The Identity statement shall be prominent, conspicuous, legible, and of a color that contrasts with the background.
3. Intervening material prohibited: No intervening material is allowed in the required wording of the identity statement. Words such as "estate", "estate-grown", "organic", "organically grown", "pure", etc., or any other terms denoting a coffee style shall not appear as part of or within the identity statement, although they may appear elsewhere on the label apart from the Identity statement.

ADVERTISING. The labeling requirements set forth in section 486-120.6, HRS is applicable to Ad copy and packaging advertising for roasted, instant, ready-to-drink, and the bulk commercial (not-for-individual-sale) complimentary pouches resorts give to guests that contain Hawaii-grown coffee and coffee blends.

OTHER REQUIREMENTS. As a food product, coffee is also subject to the labeling requirements of the Food and Drug Branch of the State Department of Health. Contact the Food and Drug Branch office on your island or the office on Oahu at (808) 586-4725 for information on requirements pertaining to the identity statement for flavored coffees, a statement of artificial or natural flavors added, placement and minimum type size of mandatory information (other than quantity declaration), ingredient statement, and the use of terms representing a geographical origin.

To prevent labeling non-compliance, we recommend that your proposed label format be reviewed prior to printing. A copy of your label may be submitted to the Hawaii Department of Agriculture's Measurement Standards Branch main office.

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EXAMPLES OF IDENTITY STATEMENTS FOR ROASTED HAWAII-GROWN COFFEES

Note: For 100% single source geographical origin beans, you only need a **single identity statement line**.

<u>In Compliance</u>	<u>NOT in Compliance</u>	<u>Remarks (non-compliance)</u>
100% KONA COFFEE	100% Pure Kona Coffee	"Pure" is intervening material
	100% Kona	"Coffee" is required in the identity after "Kona"
	Kona Coffee 100%	The percentage must appear first
KONA COFFEE	KONA	"Coffee" is required in the identity after "Kona"
	Kona Peaberry Coffee	"Peaberry" is intervening material

Note: For any **blend** with multiple origin beans, be they Hawaiian or foreign origin sourced, **a second identity statement line** shall list the bean origin location and weight % in decreasing weight % order for all beans used.

10% KONA COFFEE BLEND Contains: 90% foreign-grown Coffee	10% Kona Blend Coffee	* Note: All non-compliant blend examples are missing 2 nd identity statement line "Contains:" xx weight % geographic origin location "Coffee".
10% Kona Coffee Blend Contains: 50% Colombian, 40% Costa Rican	10% Kona Blend	"Coffee" is required before "Blend"
	10% Kona Coffee	"Blend" is required after "Coffee"
	10% Kona	"Coffee Blend" is required after "Kona"
	Kona Coffee Blend	Requires weight % before "Kona"
	Kona Blend	Missing weight % and term "Coffee"
	Kona Coffee	Missing weight %, the term "Coffee", and word phrasing order. Use of "Kona Coffee" Implies 100% Kona and not Blend.
MACADAMIA NUT 10% KONA COFFEE BLEND Contains: 90 % foreign-grown Coffee	10% Kona Macadamia Nut Coffee Blend	"Macadamia Nut" is intervening material, But such words may appear above the required Identity statement
51 % Kona Coffee ALL HAWAIIAN		"All Hawaiian" may only be used when 100% of the product was grown and processed in Hawaii
51% KONA COFFEE Contains: 49% other Hawaiian Coffee or Contains: 25% Kau, 24% Hamakua Coffee		For 100% Hawaii-grown coffee mixture not processed in Hawaii.