

**Communication from the
Government of Costa Rica**

1. The Executive Director attaches a communication from the Government of Costa Rica regarding the draft “SCA Standard 110-2026 Green Coffee: Grading, Specifications, and Test Methods (for the Purpose of Trading)”, prepared by the Specialty Coffee Association (SCA).

San Pedro de Barva, Heredia, September 21, 2026

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OFFICIAL POSITION OF COSTA RICA

Draft SCA-110 Green Coffee: Grading, Specifications, and Test Methods (for the Purpose of Trading)

Michael Wheeler
President
International Coffee Council

Vanusia Nogueira
Executive Director, International Coffee Organization
London, United Kingdom

Subject: Costa Rica's technical opposition to approval of draft SCA-110 in its current wording

Dear Mr. Wheeler and Ms. Nogueira:

The Coffee Institute of Costa Rica (ICAFFE) extends its greetings. Pursuant to a final resolution adopted by our Board of Directors at Session No. 2491, Resolution No. 04, we hereby communicate to PROMECAFE Costa Rica's official position regarding draft SCA-110, currently identified by the Specialty Coffee Association (SCA) as a standard under development.

Costa Rica recognizes the value of modernizing green coffee evaluation and incorporating physical, descriptive, affective, and extrinsic information. However, following the technical analysis conducted, this Board of Directors considers that the proposal, in its current form, does not meet the standards of objectivity, verifiability, comparability, and governance required to support its approval.

1. Costa Rica's Institutional Position

Costa Rica opposes the approval and adoption of draft SCA-110 in its current wording because it creates the possibility of diluting and misrepresenting the concept of specialty coffee by failing to establish a universal, objective, and verifiable technical threshold that clearly distinguishes specialty coffee from other commercial categories.

This opposition does not disregard the contributions of the Coffee Value Assessment (CVA). It is directed specifically at converting those assessments into an international grading system for trading purposes before minimum physical requirements, the authority of national entities, verification of extrinsic attributes, review mechanisms, and the effects on differentiated-coffee-producing countries have been adequately resolved.



2. Technical Grounds for the Opposition

1. **Dilution of the concept of specialty coffee.** The draft establishes neither a universal specialty grade nor a common threshold. The determination is delegated to each entity designated as a PC-SCO, allowing the same grade to be considered specialty coffee in one country but not in another. This approach weakens comparability and may broaden the category without ensuring an equivalent level of quality.
2. **Reduced and inconsistent physical requirements.** Grade 1 allows up to ten Category 2 defects in 350 grams; Grades 2 and 3 establish no maximum for such defects; Grade 4 lacks an equivalent limit for physical defects; and Grade 6 contains no minimum technical specifications. By contrast, ICAFE's Specialty preparation permits no primary defects and allows a maximum of five secondary defects in 350 grams.
3. **Provisional and incomplete physical methodology.** The physical assessment temporarily relies on the Washed Arabica Green Coffee Defect Guide pending publication of SCA-107 Coffee Value Assessment: Physical Assessment. This condition limits the certainty and methodological stability of the proposed system. Moreover, the CVA methodology should not be extrapolated to define specialty coffee as the proposed standard seeks to do, because this would undermine the rigorous criteria that should distinguish these coffees. Excessive relaxation of the requirements for classifying coffee as specialty coffee would also distort the marketing of our most select coffees and diminish the value of the efforts made by Costa Rica and other similarly positioned producing countries.
4. **Subjective criteria without verifiable thresholds.** Terms such as desirable attributes, undesirable attributes, excessive intensity, or significant additional value require interpretation, yet the draft establishes no universal parameters for their application. A majority decision by Q Graders is likewise not supported by sufficiently developed rules governing repeatability, interlaboratory comparison, discrepancies, and technical review.
5. **Undefined role of the PC-SCO.** The document assigns decisive functions to this entity but does not precisely define its legal nature, recognition, composition, authority, territorial scope, independence, conflict-of-interest management, supervision, auditing, or accountability. Nor does it establish how disputes among a PC-SCO, evaluators, and commercial operators would be resolved.
6. **Extrinsic attributes may be available, but are not necessarily verified.** Information concerning the farm, producer, variety, and process may contribute to differentiation, but availability alone does not establish authenticity. The draft sets no minimum chain-of-custody or traceability requirements, supporting documentation, audit requirements, controls against inaccurate declarations, or accountability for false information.



7. **Lack of comparability and commercial certainty.** Allowing each country to determine specialty grades and acceptable attributes may result in different classifications for the same lot. This increases the risk of dual classification, asymmetries among countries, contractual disputes, and reduced clarity for producers, buyers, and authorities.
8. **Unsubstantiated economic impact.** The draft does not quantify what share of global production could fall within Grades 1, 2, and 3, nor does it assess whether a larger supply recognized as differentiated coffee could compress FOB differentials. It also does not determine the costs of evaluation, training, accreditation, documentation, and traceability for producing countries.
9. **Regulatory and editorial gaps.** The scope omits essential matters such as PC-SCO recognition, appeals, arbitration, and governance. Terminology, cross-references, and tables should also be reviewed to eliminate ambiguity and ensure that each requirement has a clearly defined test method and consequence.
10. **Potential application of this standard to ICO contracts.** Applying this standard to such contracts would inappropriately extend commercial conditions that should remain exclusive to specialty coffees by including, within that concept, coffees that do not meet the minimum conditions required to compete under that designation.
11. **The proposed classification would create confusion in commercial processes and relationships** between specialty-coffee-producing countries and their customers worldwide. By leaving the definitions of Grades 4 through 6 open to national interpretation, it calls into question whether the framework can function as a genuine standard capable of differentiating quality levels.

3. Specific Risk to Costa Rica

Costa Rica competes internationally on the basis of origin, reputation, traceability, consistency, and differentiation—not volume. For a country with high production costs, allowing a broader range of coffees to enter high-value categories without a universal minimum physical threshold could reduce the distinctiveness of origin, intensify competition for premiums, and impose additional costs on the sector without assurance of an equivalent commercial return.

Accordingly, compliance with an SCA grade should not be interpreted as automatic compliance with ICAFE's official classification or with INTE A75. Costa Rica must preserve the independence of its national system, in accordance with Law No. 2762, its amendments, and its Regulations, and avoid any equivalency that would lower the requirements protecting the quality and reputation of Costa Rican Coffee.

4. Resolution of the Board of Directors

Resolution No. 04: In consideration of the matters presented by the Administration and the proposed SCA-110-2026 Standard, the Directors resolve that Costa Rica's



official position shall be to oppose the current wording and to present this position before international organizations, including the ICO and PROMECAFE, requesting a formal statement by producing countries opposing the proposed provision because it misrepresents the definition of specialty coffee.

Approved unanimously by those present and declared final.

1. **Acknowledge and endorse** the technical analysis presented regarding draft SCA-110.
2. **Oppose its approval and adoption** in its current wording, based on the identified inconsistencies, subjective elements, and governance gaps.
3. **Maintain the full independence** of Costa Rica's Coffee Classification System and reject any automatic equivalency with SCA grades.
4. **Submit to PROMECAFE.** Communicate this official position for its information and consideration by the relevant regional bodies.
5. **Ensure institutional follow-up.** Instruct the Administration to provide technical follow-up to the process and submit to the Board of Directors any new version or proposal related to the potential adoption of SCA-110.
6. **Declare this resolution final** and authorize its communication to PROMECAFE through the Presidency of the Board of Directors.

We thank the International Coffee Organization for its consideration of Costa Rica's official position and recognize the Organization's willingness to hear all parties and build consensus in key processes—an approach that will be welcomed by all members.

Sincerely,

Fernando Naranjo Retana
Chair, Board of Directors
Coffee Institute of Costa Rica

Gustavo André Jimene E
Executive Director
Coffee Institute of Costa Rica

CC: Executive Directorate; Regulatory Affairs Management; Secretariat of the Board of Directors; Archives; PROMECAFE Secretariat

