



# 2026 Update on State and Federal COFFEE LABELING LAWS

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# New Coffee Labeling Law

## §486-120.6, HRS

Hawaii-Grown and Hawaii-Processed Coffee;  
Labeling or Advertising Requirements

**Act 211 (July 5, 2023) Effective July 1, 2024**

**Act 198 (July 3, 2024) Effective July 1, 2024**  
and is now the current law superseding Act 211.

- 1. Expand scope of products to RTD coffee beverage**
- 2. All Hawaiian – 100% grown and processed in Hawaii**
- 3. Coffee Blend – List all weight % in the blend totaling 100% or use “% Foreign-Grown Coffee”**
- 4. Retailer’s exemption from liability for product violation**
- 5. Increase to 51% coffee blend on July 1, 2027**

# Act 211 enacted July 5, 2023

## Key changes are:

### ➤ **SCOPE OF PRODUCTS**

Expanded the scope of products covered by the statute which now includes:

- Ready-to-Drink beverages, and
- single brew - complimentary coffee pouches provided by transient accommodation facilities (such as resorts, hotels, B&B's), in addition to Roasted and Instant coffee products.

### ➤ **“ALL HAWAIIAN”**

To use “ALL HAWAIIAN” in labeling or advertising a product, now requires the coffee beans to be 100% produced and processed in Hawaii.

### ➤ **COFFEE BLEND**

The identity statement must list the contributing weight % of beans from each geographic region they originate from. The sum of the weight % must total 100%. (Allow consolidating multiple geographic location names to % Foreign-Grown Coffee)

# Act 198 enacted July 3, 2024

Act 198 superseded Act 211 and became the current law on July 1, 2024.  
Key changes are:

- Retailers that do not package roasted coffee, instant coffee, or ready-to-drink coffee beverages shall not be liable for the sale of roasted coffee, instant coffee, or ready-to-drink coffee beverages that use a label or advertisement in violation of the law. Section 486-120.6(e), HRS -- Effective July 1, 2024
- 10% coffee blend expires June 30, 2027. Section 486-120.6(d)(2)(A)  
51% coffee blend effective July 1, 2027. Section 486-120.6(d)(2)(B)

# IDENTITY STATEMENT

## ➤ 1. Packages that contain 100% Hawaii-grown coffee from a SINGLE geographic origin

The **geographic origin** of the Hawaii-grown beans followed by the word “**Coffee**”. The geographic origin may be preceded by the term **100%**.

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

### Examples:

HAMAKUA COFFEE	or	100% HAMAKUA COFFEE
KAU COFFEE	or	100% KAU COFFEE
KAUAI COFFEE	or	100% KAUAI COFFEE
KONA COFFEE	or	100% KONA COFFEE
MAUI COFFEE	or	100% MAUI COFFEE
MOLOKAI COFFEE	or	100% MOLOKAI COFFEE
OAHU COFFEE	or	100% OAHU COFFEE
HAWAII ISLAND COFFEE	or	100% HAWAII ISLAND COFFEE

### For State of Hawaii as a geographic origin

HAWAII COFFEE	or	100% HAWAII COFFEE
HAWAIIAN COFFEE	or	100% HAWAIIAN COFFEE

# IDENTITY STATEMENT

## ➤ 2. Packages that contain 100% Hawaii-grown coffee from SEVERAL Hawaii geographic origins

Use of “ALL HAWAIIAN” may be used when 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 either 100% Hawaiian Coffee or 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”.

Example (Grown & processed in Hawaii – 20% Kona, 40% Maui, 40% Kauai):

**20% KONA COFFEE ALL HAWAIIAN**

**Contains: 40% Maui Coffee, 40% Kauai Coffee**

Example (Grown but not processed in Hawaii):

**20% KONA COFFEE**

**Contains: 80% other Hawaiian-grown Coffee**

Non-Compliant Example using “ALL HAWAIIAN” when not processed in Hawaii:

**20% KONA COFFEE ALL HAWAIIAN**

**(Roasted & Packaged by XYZ Company, Compton, CA)**

Violates HRS §486-120.6(d)(6)

# IDENTITY STATEMENT

## ➤ 3. Hawaii-grown coffee blend with COFFEE NOT GROWN in Hawaii

The blend must contain minimum 10% Hawaii-grown coffee until June 30, 2027

Identity statement shall consist of two lines:

First line 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**"

Second line shall have "**Contains:**" followed in **descending weight % order** a list for the balance of the weight % contribution and **geographic origin or regional origin location region** name separated by commas the list of bean location sources used in the coffee blend. The sum of all weight % must equal 100%.

### Examples:

**20% OAHU COFFEE BLEND**

**Contains: 50% Colombian Coffee, 30% Costa Rican Coffee**

or an **aggregate** phrase

**20% OAHU COFFEE BLEND**

**Contains: 80% Foreign-grown Coffee**

# IDENTITY STATEMENT EXAMPLES COMPLIANT vs NON-COMPLIANT

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

## In Compliance

100% KONA COFFEE

KONA COFFEE

## NOT in Compliance

100% Pure Kona Coffee

100% Kona

Kona Coffee 100%

KONA

Kona Peaberry Coffee

## Remarks (non-compliance)

The word "Pure" is intervening material

"Coffee" is required in the identity after "Kona"

The percentage must appear first

"Coffee" is required in the identity after "Kona"

"Peaberry" is intervening material

# IDENTITY STATEMENT EXAMPLES COMPLIANT vs NON-COMPLIANT

**Note:** For any *blend* a *second identity statement line* shall list the bean origin location and weight % in decreasing weight % order for all beans used.

## In Compliance

10% KONA COFFEE BLEND  
Contains: 90% Foreign grown  
Coffee

10% Kona Coffee Blend  
Contains: 50% Colombian,  
40% Costa Rican Coffee

MACADAMIA NUT  
10% KONA COFFEE BLEND  
Contains: 90 % foreign-grown  
Coffee

## NOT in Compliance

10% Kona Blend Coffee

10% Kona Blend

10% Kona Coffee

10% Kona

Kona Coffee Blend

Kona Blend

Kona Coffee

10% Kona Macadamia Nut  
Coffee Blend

## Remarks (non-compliance)

**\*** Note: **All non-compliant blend examples** are missing 2<sup>nd</sup> identity statement line: "Contains:" xx weight % geographic origin location "Coffee".

Required wording is "coffee blend" \*

"Coffee" is required before "Blend" \*

"Blend" is required after "Coffee" \*

"Coffee Blend" is required after "Kona" \*

Requires weight % before "Kona" \*

Missing weight % and term "Coffee" \*

Missing weight %, the term "Blend", and word phrasing order. Use of "Kona Coffee" implies 100% Kona origin and not a blend. \*

"Macadamia Nut" is intervening material, But such words may appear above the required Identity statement. \*

# LABELING GUIDELINES

Available at DAB website <https://dab.hawaii.gov/qad/files/2024/08/MSB-Coffee-labeling-guidelines-8-2024.pdf>

## LABEL REVIEW

You may submit drafts of your label for a free review prior to printing and/or send labeling questions to: **[dab.ms.labeling@hawaii.gov](mailto:dab.ms.labeling@hawaii.gov)**

You can call Measurement Standards Branch at (808) 832-0690

Address: 1851 Auiki Street, Honolulu, HI 96819-3100

# **New 51% Federal Coffee Labeling Law**

Enacted Nov 11, 2025 - FDA has mandate to enforce and currently exploring partnership with State

- **Feb 10, 2026, Meeting -- FDA, DAB & Hawaii Coffee Industry Leaders to discuss the new 51% coffee labeling law.**
- **FDA stated the 51% coffee labeling law is self executing and may not need to adopt regulations for enforcement. The language in the law is detailed enough that agencies can follow it directly.**
- **Follow-up meeting.**

# Questions?