

What requirements must natural food additives comply with to be allowed on the European market?

Across Europe, regulatory requirements for natural food additives are becoming more stringent. European buyers of natural food additives are increasingly demanding that suppliers meet their additional buyer requirements. Moreover, there is an increasing demand for natural food additives for niche markets, such as organic. As an exporter of natural food additives that wants to successfully trade in the European market, you must meet regulatory, additional buyer and niche market requirements.

Contents of this page

1. [What are mandatory requirements?](#)
2. [What additional requirements do buyers often have?](#)
3. [What are the requirements for niche markets?](#)

1. What are mandatory requirements?

Safety of natural food additives

As an exporter of natural food additives, you must demonstrate that your natural food additives are safe for use. You must therefore be compliant with the European Union's (EU) [General Food Law](#), which ensures the safety of your natural food additives. Non-compliance will result in your natural food additives not being allowed to enter the European market.

Under the General Food Law's legislative framework, you are legally required to have a traceability system in place throughout your entire supply chain. This is because having a traceability system in place guarantees that the quality of your natural ingredients can be traced back from consumer to producer. The European Commission provides a wide range of information on the traceability aspect of the EU General Food Law. For natural food additives from plant origin, the general guidelines apply. For the following two sectors, more detailed guidelines for traceability apply:

- Foods of animal origin: [Commission Implementing Regulation \(EU\) No 931/2011](#).
- Sprouts and sprout seeds: [Commission Implementing Regulation \(EU\) No 208/2013](#).

The EU legally requires you to immediately withdraw or recall any of your natural food additives that are no longer safe for use after they have reached and are on the European market. The EU also legally requires you to immediately notify them and the relevant national authorities of this so they can monitor the situation and take appropriate action to ensure food safety. Failing to do this could result in your business relationships with European buyers being terminated and could potentially destroy your reputation in the European food industry.

Tips:

Read the EU's [guidance on how to be compliant and implement the EU's General Food Law](#) and comply with the [EU's General Food Law](#).

Read the EU factsheet on [food traceability](#), which provides useful information about food traceability in the EU, and ensure you have a traceability system throughout your entire supply chain.

Read and comply with the [EU's Key Obligations of Business Operators](#).

Contact [Open Trade Gate Sweden](#) if you have specific questions regarding rules and requirements in Sweden and the European Union. Open Trade Gate Sweden is a one-stop information centre tasked with assisting exporters from developing countries interested in the Swedish market.

Visit the [EPing website](#) for an overview of country-specific measures that could affect the trade of

natural food additives, along with how international standards can differ. It also provides [a list of contact persons per country](#) appointed by the World Trade Organisation (WTO).

Contamination

In order for your natural food additives to enter and be traded in the European market, you need to prove your natural food additives are not contaminated, or within levels set by the EU. This is because the EU legally requires you to do so. Non-compliance will result in your natural food additives not being allowed to enter the European market.

The EU legally requires you to prove that your natural food additives are not contaminated by three elements, or within the levels set by them. The first element is physical, which concerns plastic, metal and dirt residues. The second element is chemical, which concerns pesticides. The third and final element is biological, which concerns bacteria. You must prove that your natural food additives are not contaminated by these three elements, or that they are within the prescribed levels set by the EU.

For food products, the EU has set Maximum Residue Levels (MRLs) for pesticides ([EC Regulation 396/2005](#)) and heavy metals ([EC Regulation 1881/2006](#)). You must ensure that your natural food additives do not contain pesticides or heavy metals above the levels set by the EU. Non-compliance will result in your natural food additives not being allowed to enter the European market or being withdrawn.

European buyers of natural food additives regularly test products they import to determine whether or not they are contaminated, or within set levels. Alongside the EU's legal requirements, this is another reason why your natural food additives must not be contaminated, or within set levels.

Tips:

Prove your natural food additives are not contaminated, or within the limits set by the EU.

Use the EU's [MRL database](#) to identify the Maximum Residue Levels (MRLs) for your natural food additives, and comply with them.

For further information about MRLs, visit the [EU Trade Helpdesk](#). Here, you will find useful information on import rules and taxes in the European Union.

The [Integrated Pest Management](#) system provides guidance on reducing the use of pesticides in your natural food additives. Consider seeking their guidance.

Keep in mind that European buyers regularly check whether the natural food additives they import are contaminated.

Classification, Labelling and Packaging (CLP)

The EU's [Classification, Labelling and Packaging \(CLP\) Regulation](#) (EC Regulation 1272/2008) identifies hazardous chemicals and informs users about their hazards through standard symbols and phrases. For your natural food additives to enter the European market, the EU legally requires you to meet its CLP Regulation. Non-compliance will result in your natural food additives not being allowed to enter the European market.

Certain natural ingredients are hazardous; such is the case with certain essential oils that are classified as Class 3 Flammable Liquids and therefore require additional controls for transportation by air, land and sea. These

include Tea Tree Oil, Citrus Oils (lemon, grapefruit, bergamot, orange) and Rosemary Oil.

You have to guarantee safety during the import-export process. The EU legally requires special packaging to be used for hazardous ingredients during the transport and handling process in particular. Alongside this, the EU legally requires the corresponding warning labels to be applied on special packaging used.

As an exporter, you must determine whether your natural food additives are hazardous. Check the [European Chemicals Agency \(ECHA\) database](#) to determine if your natural ingredient is hazardous. If your natural ingredient is hazardous, use the appropriate special packaging and corresponding warning labels. You are legally required to use the [Globally Harmonized System of Classification and Labelling of Chemicals \(GHS\)](#) labels for your food additives. This is to ensure those coming into contact with your natural ingredient throughout the supply chain are not put in danger or at risk of harm whilst handling it.

Tips:

Ensure compliance with the EU's Classification, Labelling and Packaging (CLP) Regulation.

Use the [European Chemicals Agency \(ECHA\) database](#) to determine if your natural food additive is hazardous. If your natural ingredient is hazardous, use the appropriate special packaging and corresponding warning labels.

You are legally required to use the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) labels.

You can read more about the CLP Regulation and GHS on the Health and Safety Executive website.

Substances allowed in the European Union

Food additives are strictly regulated by the European Union. This is to ensure the safety of consumers who consume foods containing such substances. In recent years, the EU has placed increasing emphasis on this, and this trend is set to continue. [EU Regulation 1333/2008](#) sets rules for the use of additives, such as colours and thickeners. Meanwhile, [EU Regulation 1334/2008](#) sets rules for the use of flavourings, such as essential oils.

As an exporter of natural food additives, you must ensure your ingredients are allowed for use in the EU. This is because European customs authorities do not allow food products into the European market if they contain unauthorised additives, or flavouring or substances not allowed in the EU.

The substances allowed in foods in the EU, as well as rules concerning these substances, are subject to changes and updates. You must regularly monitor changes to ensure your natural food additives are allowed to enter the European market. For example, check if your natural food additives have been removed from the relevant EU rules.

Tips:

Annex 1 of [EU Regulation 1334/2008](#) lists flavouring substances allowed for use in the European Union. Check if your natural ingredients are listed here.

E numbers are approved for use in the EU. For an overview of E numbers, see the Annex of [EU Regulation 1333/2008](#) on food additives.

The European Flavour Association (EFFA) has published [guidance](#) on the European Commission's Flavouring Regulation; consider reading it.

Regularly check if there have been any changes or updates to food substances, such as your natural food additives allowed into the EU.

Food extracts for colouring of additive-free foods

In recent years, there has been growing demand for additive-free foods, and this trend is set to continue. Food extracts with colouring properties are not classified as food additives by European legislation, and are thus suitable for use in additive-free foods.

If you are a company with food extracts that have colouring properties, you must be aware of this legal distinction. Furthermore, this could allow you to benefit from European demand for additive-free foods. See the assistance provided in the [library](#) of the Natural Food Colours Association (NFSA) on understanding the legal distinction between food additives and food extracts with colouring properties.

Tips:

Familiarise yourself with the legal distinction between food additives and food extracts with colouring properties.

As an exporter of natural food additives, capitalise on the increasing demand for additive-free foods across Europe.

Convention on Biological Diversity/Access and Benefit-Sharing

The [Nagoya Protocol of the Convention on Biological Diversity](#) (CBD) aims to ensure that the benefits of genetic resources and long-established knowledge are shared equitably. It does so through its Access and Benefit-Sharing (ABS) scheme, which is particularly important for wild-collected ingredients.

The European Union has adopted international treaties and protocols on using plant resources into European law. The Nagoya Protocol of the Convention on Biological Diversity (CBD) is an important protocol that was translated into European Law. It is likely part of your national laws as well.

If your country is a signatory to the Nagoya Protocol, you must comply with the Protocol. Non-compliance will result in your natural food additives not being allowed to enter the European market.

Tips:

Determine if your country is a signatory to the Nagoya Protocol.

If your country is a signatory to the Nagoya Protocol, ensure you comply with it.

2. What additional requirements do buyers often have?

Certification

Food safety is important to European buyers of natural food additives. As a result, European buyers regularly demand extra certification proving the added safety and quality of the natural food additives they buy. European buyers demand certification of a food safety management system based on the European Union's Hazard Analysis Critical Control Points (HACCP) system outlined in [EU Regulation 852/2004 on hygiene of food stuffs](#).

To trade with European buyers, you should meet their demands for extra certification. Doing so will give you an advantage in terms of successfully establishing yourself on the European market. This could be the basis for developing long-lasting trading relationships with European buyers.

The most common certifications demanded by European buyers are: [Food Safety Certification \(FSSC 22000\)](#); [International Food Safety \(IFS\)](#); [Safe Quality Food \(SFQ\)](#); and [British Retail Consortium \(BRC\)](#) certification.

Tips:

Speak to European buyers of natural food additives and find out which certification they want. If you do not have the certification they want, consider getting it.

If you already have extra certification sought by European buyers, inform them of this when you approach them.

[Identify relevant food safety management standards](#) for your natural food additives from the ITC's Standards Map.

Documentation

European buyers of natural food additives value exporters that provide them with well-structured and organised product and company documentation. Consider doing this, as it gives you an advantage when trying to establish yourself on the European market. From there, you can develop long-lasting trading relationships with European buyers. Additionally, it makes you look organised and well prepared to European buyers.

European buyers of natural food additives usually want exporters to first provide them with Safety Data Sheets (SDS). Safety Data Sheets contain the following: product description; classification; hazard identification; and information on safety measures. Secondly, European buyers want to be provided with Technical Data Sheets (TDS). Technical Data Sheets contain the following: product description; product classification; quality analysis; information on applications; and certificates.

Thirdly and finally, European buyers request a Certification of Analysis (CoA), which contains analytical data on the product delivered. The Certification of Analysis matches: data mentioned in the TDS; the pre-shipment sample that was approved by the buyer; and contractual agreements with the buyer.

Consider acquiring an SDS, a TDS and a CoA for your natural food additives and have them ready for European buyers. Additionally, if you already have them, inform European buyers of this when you approach them.

Tips:

Consider meeting the demands of European buyers who want documentation concerning your natural food additives.

See the [CBI study](#) on how to prepare technical documentation for natural food additives.

If you already have documentation sought by European buyers, notify them of this.

Samples

European buyers usually demand samples after reviewing documentation concerning the natural food additives they are considering buying. This is to determine whether or not your natural food additives are compliant with European Union legislation and meet their specifications. European buyers will test and analyse samples at laboratories.

As an exporter of natural food additives, ensure the samples you send to European buyers show you at your best. Therefore, you must send samples of good quality, of the right quantity and on time. Doing so will help you establish yourself on the European market, where you can develop lasting trading relationships with European buyers. Failing to meet this requirement will make it difficult for you to establish yourself on the European market.

Additionally, be aware that European buyers will regularly test the natural food additives that you supply. It is normal for testing to be done on every batch. You should therefore ensure your natural food additives are always of the finest quality. Failure to do so may result in the end of your business relationship with European buyers.

Tips:

Ensure the samples you send to European buyers are of the finest quality, of the right quantity and on time.

Always send European buyers of natural food additives the finest-quality natural food additives after you have established a business relationship with them.

See the [CBI study](#) on how to prepare technical documentation for the natural food additives sector.

3. What are the requirements for niche markets?

Certification of Organic production

In recent years, there has been growing consumer demand for certified organic products in the European market. This trend is expected to continue. As a result, European buyers are increasingly demanding certified organic food ingredients.

Certified organic additives are produced and processed using natural techniques. This includes crop rotation, the biological protection of crops and the use of green manure and compost. In order to trade your natural food additives as organic on the European market, you must be compliant with European Union regulations. You can find information on [EU organic certification](#) on the IFOAM website.

Having your food additives certified as organic shows European buyers that you are a reliable trading partner and that your food additives are of high quality. You can use the certification of your food additives as a selling point when approaching European buyers.

Tips:

Consider getting organic certification for your natural food additives.

Ensure you comply with European Union Regulation 834/2007.

Refer to the ITC Standards Map for a [comprehensive overview of certification schemes](#) in the sector.

If you already have organic certification sought by European buyers, notify them of this when you approach them.

Environmental and social sustainability

There is growing consumer demand for environmentally and socially-produced products in the European market. There is growing demand from European buyers for sustainably-produced natural food additives.

As an exporter, one way to meet this demand is by gaining verification and certifications that prove you meet environmental and social standards. Certification proving your natural food additives have been produced according to certain sustainability standards can be obtained from the [UNCTAD BioTrade Initiative BioTrade Principles and Criteria](#), as well as from the [FairWild](#) Standard. To prove you meet social standards, consider [FLO Fairtrade](#) certification or the [Fair for Life](#) Standard.

Tips:


Consider acquiring certification to prove your natural food additives are produced according to certain environmental and/or social standards.


If you already have certification proving your natural food additives have been produced according to certain standards, inform European buyers of this when you approach them.


This study has been carried out on behalf of CBI by [Ecovia Intelligence](#).

Please review our [market information disclaimer](#).

Follow us for the latest updates

(opens in a new tab)  Twitter

(opens in a new tab)  Facebook

(opens in a new tab)  LinkedIn



[RSS](#)