Exporting fresh pomegranates to Europe

Europe is a net importer of fresh pomegranates. In addition to the local production volume, Europe’s trade balance (imports minus exports) added an estimated 50,000 tonnes of pomegranates to the apparent consumption in 2017. Pomegranates are a luxury fruit that sells well in the higher segment. The demand for more exotic and healthy fruit can help increase profitability for exporters from developing countries.

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1. Product definition

The pomegranate (*Punica granatum*) is a tree about 5–8 metres in height that bears fruits with a diameter of around 10 cm. The skin of the fruit is reddish and thick. The edible part consists of the hundreds to thousands of small seeds or arils inside the fruit.

Pomegranates are cultivated in large parts of the world, including Latin America, southern Europe, Asia and Africa. They can be grown in tropical to warm temperate climates, although the best-quality fruits are produced in regions with cool winters and hot, dry summers. In the northern hemisphere, pomegranates are typically in season from September to February, while in the southern hemisphere, they are in season from March to May.

The pomegranate has more than 500 named cultivars, several of which are available on the European market. Cultivars that are produced in Europe (mainly Spain) include ‘Mollar de Elche’, ‘Mollar Valenciana’, and ‘Wonderful’. However, new varieties have been introduced in recent years.

Pomegranates do not have an individual Harmonised System (HS) code. They are included in the code for fresh fruit that is not mentioned elsewhere: 08109075. Precise trade statistics are therefore unavailable.

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<td>0810907530</td>
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08109075 | Fresh fruit, edible (excl. nuts, bananas, dates, figs, pineapples, avocados, guavas, mangoes, mangosteens, papaws ‘papayas’, tamarinds, cashew apples, jackfruit, lychees, sapodilla plums, passion fruit, carambolas, pitahayas, citrus fruit, grapes, melons, apples, pears, quinces, apricots, cherries, peaches, plums, sloes, strawberries, raspberries, blackberries, mulberries, loganberries, black, white and red currants, gooseberries, cranberries, fruits of the genus Vaccinium, kiwifruit, durians and persimmons)

Source: Eurostat Comext

2. Which European markets offer opportunities for exporters of fresh pomegranates?

NOTE: The trade statistics below are indicative, as there are no specific data for pomegranates. The analysis is based on the product code HS 08109075 (see product description above). This product group includes pomegranates and other fruit including cherimoya, barbary figs and medlars. According to sector experts, pomegranates are the most important product in this group.

Growing import from developing countries

The product group in which pomegranates are included shows a year-on-year import increase. The total import volume developed from 67,000 tonnes in 2013 to 95,000 tonnes in 2017. Responsible for this growth are suppliers from developing countries, with Turkey and Peru as the main drivers. The import from other non-European countries is stable and mainly originates from Israel and Chile.

The European trade in pomegranates is expected to increase, both from domestic sources (Spain and Greece) and from overseas through the Netherlands and other trading countries.

Figure 1: European import volume of fresh fruit including pomegranates (HS 08109075)
in 1,000 tonnes

Source: Market Access Database
Germany is a main destination for pomegranates

Climate conditions in northern European countries are not suitable for the production of pomegranates. These countries rely on imports of pomegranates from southern Europe, as well as from producing countries outside Europe.

A large part of the imported pomegranates end up in Germany. Most of its volumes come from Turkey and Spain, which are supplemented by other countries supplied through the Netherlands. Because Germany has almost no (re-)export of pomegranates, they are the principle destination. The growing second destination market is Italy, followed by France and the United Kingdom.

Most of the import of pomegranates goes through the Netherlands

Europe is a net importer of pomegranates, with an estimated net volume (import minus export) of close to 50,000 tonnes in 2017. Most of the import from developing countries, such as Colombia, Peru and South Africa, goes through the Netherlands. From here, pomegranates are distributed all over Europe, with Germany as the most important buyer.

Other countries that import relatively large volumes from origin countries are Austria (mainly from Turkey) and the United Kingdom (mainly from Turkey and Peru). According to trade statistics, Austria re-exports a fair amount of the imported pomegranates to Germany.
**Figure 3: Main European exporters of fresh fruit including pomegranates (HS 08109075), including European trade, in 1,000 tonnes in 1,000 tonnes**

Source: ITC TradeMap

**Tips:**

Participate in international trade fairs such as the *Fruit Logistica* in Berlin, which can provide useful contact opportunities.

Consider the Netherlands as a port of entry for imports that are to be re-exported to other countries in Europe, including Germany.

**Spain competes from October to January**

During the local pomegranate season from October until January, Spain will actually become a strong competitor. As a supplier, you will find few opportunities because the Spanish import is still very limited.

Spain has the largest production of pomegranates in Europe, reaching 50,000 tonnes, most of which are *Mollar de Elche*, an exceptionally sweet variety with a cream-red outside colour and a ‘protected denomination of origin’ (PDO). As a result, Spain does not only have a high consumption of pomegranates, but it is also the number one supplier within Europe.

The production in Greece and Italy is also increasing. Contrary to Spain and Greece, in Italy demand exceeds supply and you can find foreign competition from Spain, Turkey and Israel.

**Tip:**

Closely follow the developments and local strategies in Spain, as it is leading the production and supply season in Europe. This will help you understand the European market and determine risks and opportunities in supply and varieties. Use news sources such as *Freshplaza* and *FreshFruitPortal*. *Freshplaza* publishes a regular overview of the global pomegranate market.
3. Which trends offer opportunities in the European market for pomegranates?

Health as an important driver of growth

In the European media, pomegranates have been classified as a ‘super fruit’. This means that they are valued for their exceptional characteristics that people relate to a healthy diet, such as their high levels of punicic acid (seed oil), vitamin C and antioxidants.

Given the tendency of European consumers to embrace fruits that are healthy and tasty, health benefits are one of the main drivers of the commercial success of pomegranates.

Tip:
Be aware of the European legislation on food health claims when promoting the health benefits of pomegranates. The European Food Safety Authority has assessed the health properties of pomegranates in a scientific opinion which limits the use of unproven claims.

Pomegranates are popular as an ingredient

The marketing value of pomegranates as a super fruit has not remained unnoticed by the food industry and food services. In the past years, pomegranates have become a popular ingredient for fruit juices, flavoured water, jams, and in salads and desserts. You can also find pomegranate seed oil as a food supplement and in personal care products.

Product development and recipes help significantly in the promotion of fresh pomegranates. As consumers become more familiar with the fruit and its potential uses, they are increasingly using it in food and drink preparation at home. One of the strong pomegranate marketing companies is Pom Wonderful, which is also active with a number of products in Europe.

Tip:
Explore the potential of processed or semi-processed pomegranates by consulting the CBI market intelligence platform about exporting processed fruit to Europe.

Preference for convenience fruit

European consumers are increasingly expressing a preference for fruit that is easy to prepare and ready to eat. Therefore, pomegranates are not only sold as a whole fruit, but supermarkets are also offering the arils or fruity seeds packaged as a fresh or deep-frozen product.

The advantage of retailers selling the arils is that it provides you with a market for less perfect fruit. Fruit with superficial outer defects can still be suitable as a ready-to-eat peeled product. Exporting the fresh arils will be difficult because of the limited shelf life and requires advanced technology, for example modified atmosphere packaging.
Growing interest in sustainable fruit

In Europe, trends in the consumption of fresh fruit are developing towards more sustainable approaches to production and processing. Environmental and social issues are becoming increasingly important. Social and environmental certification schemes include actions aimed at sharply reducing and registering the use of pesticides, taking action to ensure the safety of employees and/or even including price guarantees for producers.

Certification schemes that are in line with the Global Social Compliance Programme (GSCP) are more likely to be accepted by European supermarkets. The demand for pomegranates with sustainability labels is expected to grow, especially in northern Europe. See also the buyer requirements below.

Organic demand becomes stronger

The increased attention to health and the environment is also generating more interest in organically produced fruits and vegetables. The demand for organic is strongest in northern Europe, but the market for pomegranates is not developed to the same extent as in the south, where pomegranates are a local product.

You have to consider organic pomegranates as a niche, but given their healthy and exclusive reputation, an organic label is an interesting feature.

Flavour and appearance are important

Flavour is becoming increasingly important to European consumers, as is the appearance of the fruit. An attractive, deep-red pomegranate skin colour is appealing to retail consumers.

Southern European countries, such as Spain, have always had a focus on taste and sweetness. Because pomegranates are among the more exclusive fruits, consumers from other regions also put more emphasis on flavour. In northern Europe, the preferred taste tends to go more towards the semi-sour varieties.
Tips:

Make sure that supply chain logistics and transport processes do not negatively affect the flavour and appearance of the product in any significant way.

Read more about what trends offer opportunities for fresh fruit and vegetables on the CBI market intelligence platform.

4. What requirements must fresh pomegranates comply with to be allowed on the European market?

What legal and non-legal requirements must your product comply with?

Minimise pesticides

Pesticide residues are one of the crucial issues for fruit and vegetable suppliers. The European Union (EU) has set maximum residue levels (MRLs) for pomegranates.

Products containing more pesticides than allowed will be withdrawn from the European market. Note that buyers in several Member States, such as the United Kingdom, Germany, the Netherlands and Austria, use MRLs which are stricter than the MRLs laid down in EU legislation.

Tips:

To find out the MRLs that are relevant for pomegranates, you can use the EU MRL database, in which all harmonised MRLs can be found. You can search for your product or the pesticide used and the database shows the list of the MRLs associated with your product or pesticide.

Reduce the amount of pesticides by applying integrated pest management (IPM) in production. IPM is an agricultural pest control strategy that includes growing practices and chemical management.

For other general requirements concerning contaminants, traceability and plant health control, check the buyer requirements for fresh fruit and vegetables on the CBI market intelligence platform for fresh fruit and vegetables.

Quality standards

You can find the quality requirements for pomegranates in the Standard for pomegranates of the United Nations Economic Commission for Europe (UNECE).

According to this standard, pomegranates must be:

- whole;
- sound – produce affected by rotting or deterioration such as to make it unfit for consumption is excluded;
- clean, free of any visible foreign matter;
- free of pests and damage caused by them affecting the general appearance of the produce;
- free of abnormal external moisture, excluding condensation following removal from cold storage;
- free of any foreign smell and/or taste;
- free of damage caused by frost;
free of damage caused by low and/or high temperatures;
free of sunburns affecting the arils of the fruit.

The pomegranates must have reached an appropriate degree of development and ripeness. The development and condition of the pomegranates must be such as to enable them:

- to withstand transport and handling; and
- to arrive in a satisfactory condition at the place of destination.

Pomegranates are divided into three classes:

- **Extra Class**: products of superior quality that are free of defects or that contain very slight superficial defects that do not affect the general appearance and quality of the product.
- **Class I**: products of good quality, with only slight defects in shape, colouring or skin. Colour changes due to ripening are not regarded as defects.
- **Class II**: Pomegranates that satisfy the minimum requirements but that do not qualify for Class I or Extra Class. Defects in shape, colouring and skin are allowed, but must not affect the arils of the fruit.

The **General Marketing Standards of Regulation No. 543/2011** also apply. Annex 1 of this regulation summarises the minimum requirements that products must comply to.

Conformity checks are part of **European regulation (EC) No. 1580/2007**. In the event of non-compliance, your product can be rejected. In certain third countries, local inspection bodies are allowed to carry out pre-export checks.

### Size requirements

According to the **UNECE marketing standard for pomegranates**, the fruits can be sized by count, diameter or weight:

- **Sized by count**:
  - Size determined by the number of fruits in the packaging

- **Sized by diameter**
  - Size code 1/A: ≥ 81 mm
  - Size code 2/B: 71–80 mm
  - Size code 3/C: 61–70 mm
  - Size code 4/D: 51–60 mm
  - Size code 5/E: 40–50 mm

- **Sized by weight of individual fruit**:
  - Size code 1/A: ≥ 501 grams
  - Size code 2/B: 401–500 grams
  - Size code 3/C: 301–400 grams
  - Size code 4/D: 201–300 grams
  - Size code 5/E: 125–200 grams

### Packaging

Pomegranates should be packed in a manner that provides proper protection to the product.

The materials used inside the package are to be clean and of such quality as to avoid causing any external or internal damage to the produce. The use of materials, particularly paper or stamps bearing trade specifications, is allowed, provided the printing or labelling has been done with non-toxic ink or glue.

Your packaging must be in compliance with the **Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables**.
Labelling

The label or marking of each box should at least give the following information:

- Name and physical address of the packer and/or dispatcher (which can be replaced by an officially recognised code mark)
- Name of the product (if not visible from the outside) and the commercial type
- Country of origin
- Commercial identification: class, size in minimum and maximum weight or diameter and optionally number of units
- Officially recognised code mark or traceability code (for example Global Location Number (GLN) or GLOBALG.A.P. Number (GGN) (recommended)

In addition, the label should include a certification logo (if applicable) and/or retailer logo (in the case of private label products).

Tips:
Consult the EU Trade Helpdesk for a full list of requirements for pomegranates, selecting the product code: 0810907530.

Make sure to supply the quality you agreed upon with your buyer. Small deviations can be an argument for your buyer to make a claim or reject the shipment.

5. Which additional requirements do buyers often have?

Certification as guarantee

Since food safety is a top priority in all European food sectors, you can expect most buyers to request extra guarantees from you in terms of certification.

The most commonly requested certification for pomegranates is GLOBALG.A.P., a pre-farm-gate standard that covers the whole agricultural production process, from before the plant is in the ground to the non-processed product. It is nearly impossible to supply fruit without GLOBALG.A.P., as it has become practically a standard requirement for most supermarkets, especially in northern Europe.

Examples of other food safety management systems that may be required are:

- BRC (British Retail Consortium)
- IFS (International Food Standard)
- FSSC22000 (Food Safety System Certification)
- SQF (Safe Quality Food Programme)

These management systems are supplemental to GLOBALG.A.P. and are recognised by the Global Food Safety Initiative (GFSI).

Tips:
Identify the food safety management systems that are usually requested in your target market. Expect GLOBALG.A.P. to be one of them.

Read more on the various food safety management systems on the Standards Map website.
Always remember that food safety is a major issue. Work proactively with buyers to improve food safety, be transparent and remain up to date with regard to buyer requirements and regulations.

Social and environmental compliance

There is growing attention for the social and environmental conditions in the producing areas. Most European buyers have a social code of conduct which they will expect you to adhere to. For pomegranates, social compliance is important, although product quality has top priority.

It can be a plus to be GRASP certified. GRASP is a social add-on of GLOBALG.A.P. and an accessible certification that is gaining importance in Europe.

Another good option is implementing standards recognised by the Sustainability Initiative Fruit and Vegetables (SIFAV), which consists of an initiative from traders and retailers to become 100% sustainable in sourcing from Latin America, Africa and Asia by 2020.

In the fresh trade, most fair-trade certification schemes are considered complex and expensive, and therefore have lost some of the interest of market players. However, you can find these more often in pomegranates that are processed into other products, such as tea, chocolate, juice or personal care products.

Tips:

Examine your company’s current performance, for example by completing a self-assessment of the Business Social Compliance Initiative on the amfori/BSCI website.

For a complete overview of buyer initiatives for social compliance, see the buyer requirements for fresh fruit and vegetables on the CBI marketing intelligence platform.

6. What are the requirements for niche markets?

Organic: A growing niche market

An increasing number of consumers prefer food products that are produced and processed by natural methods. Organic certification is not a main requirement, but as consumers consider pomegranates to be a super fruit, it combines very well with an organic label.

You will find most opportunities for organic fruit in northern Europe, especially in German-speaking and Scandinavian countries.

In order to market organic products in Europe, you have to use organic production methods according to European legislation and apply for an organic certificate with an accredited certifier.

Tips:

Consider organic as a plus, not as a must, and be prepared to comply with the whole organic process. Remember that implementing organic production and becoming certified can be expensive.

Read more about the principles of organic agriculture on the website of IFOAM Organics International
and about the requirements related to organic farming in the CBI buyer requirements for fresh fruit and vegetables.

7. What competition will you be facing on the European pomegranate market?

The availability of pomegranates is expanding

The pomegranate season in the northern hemisphere runs from September to February, in the southern hemisphere the season is from March through May. Pomegranates are widely cultivated throughout central Asia, the Middle East and the Mediterranean region as well as the drier parts of North and South America. India and Iran are the largest producers worldwide. Good commercial-quality pomegranates come from Turkey, Spain, Israel, Morocco, Peru and the United States (California and Arizona), among other countries. The production in many of these countries is expanding rapidly.

In between seasons, February-March and July-August, you can find supply gaps when competition is low. New varieties and storage technology can also extend seasons. Although not necessarily destined for the European market, several supplying countries start their season with early varieties. Advanced producers in Spain and Israel use optimal storage conditions to extend the availability of their pomegranates until February or even March.

Figure 4: Indicative availability calendar

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Tips:

Evaluate your position and potential competitors according to the supply planning of other producing countries. Try to focus on Europe when supply is low, for example just before competing countries start exporting.

Keep informed through news sites such as Freshplaza that provide up-to-date information on the global production of and trade in pomegranates.

Turkey and Peru are becoming stronger competitors

Turkey (43,000 tonnes), Peru (14,000) and Israel (8,000) were the main exporters of pomegranates to Europe in 2017. Turkey and Peru have increased their supply significantly over the last five years. Israel has moved to
third place with a lower export volume in 2017.

Turkey is known for its large production and relatively low prices and overlaps the season in Mediterranean Europe. Israel starts its supply early with the first variety in late August. Peru complements Turkey with an opposite season, but nearly oversupplied the European demand for the past two years in the spring and summer.

In most recent years, Egypt has also increased its production, including the Wonderful variety, and is now competing with Turkey, Greece and India.

**Figure 5: Main suppliers of fresh fruit including pomegranates (HS 08109075) to the European market**

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Source: Market Access Database

**Tip:**

Consider price to be a decisive factor and try to be flexible towards the movements in the market. If you cannot compete on price, you must be able to compensate with superior quality or other significant way of differentiation. Try not to compete on price alone, but select good varieties, build partnerships with buyers and strive for excellence in product quality and handling.

**Buyer requirements can be an obstacle to market entry**

Regulations and compliance with buyer requirements pose a major obstacle for producers and exporters seeking to enter the European market. As a new supplier, you will find the price of entrance to be high, which can be especially difficult if your business is small. The combination of strict MRLs, high quality, food safety certifications and additional social compliance make Europe suitable for exporters that are well-organised in all aspects.

**Concentrated channels make retailers powerful buyers**

The market for pomegranates is large enough to find its main outlet through supermarkets. The concentration in...
this channel make these retailers powerful buyers. As a supplier to European retailers, you are not in a position to argue about the rules of the game.

Buyers tend to prefer long-term partnerships as a means of ensuring the supply and quality of products, but they can also switch easily to other suppliers if expectations are not met.

**Tips:**
- Develop partnerships with experienced importers that can help you with accessing the larger retail channels.
- Read the [Tips for doing business with European buyers](#) on the CBI market intelligence platform.

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**Producers improve technology and cultivars**

With a growing number of competitors, innovation becomes more important. Producers look for new varieties that fit specific markets or produce higher yields. For example, a producer in Spain started with the protected [Smith cultivar](#), a productive variety with a deep-red colour inside and outside. Improvements in post-harvest, such as preservation and storage technology, can give you an advantage in quality and shelf life. Some countries have a support programme for innovation, such as the [post-harvest innovation programme in South Africa](#).

In order to remain competitive, you must keep up with the developments and the level of technology in the pomegranate market.

**Tip:**
- Explore new technologies that can give you a competitive advantage, but beware that storage duration and temperature can influence flavour in a negative way.

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**Product competition**

In the last decade, the diversity of fruits and vegetables supplied to the European market has increased. Pomegranates are eaten as snacks or used as ingredients in drinks, salads and meals. Although there are no specific substitutes for pomegranates, they do compete with other exotic fruits.

In several European countries, pomegranates still have an exclusive character. Market players give extra attention to pomegranates, for example by:

- providing information on their health benefits and their different uses;
- using varieties with improved looks (and taste);
- transforming it to convenient packages with arils;
- differentiating their products through branding.

**Tips:**
- Storytelling (for example highlighting the origin and producer of your products), recipes, novel packaging and premium quality are aspects with which you can distinguish your products from the
rest of the field. Take advantage of the perceived health benefits of pomegranates and their reputation as a 'super fruit'.

8. Which trade channels can you use to put fresh pomegranates on the European market?

Composition of market channels differs per region

The composition of market channels differs within Europe. Northern countries, for example Germany, the United Kingdom, the Netherlands and Belgium, are strongly dominated by the supermarket channel. France and Spain go even further with large hypermarkets, alongside smaller specialist shops. Countries in the Alpine region, for example Switzerland and Austria, are more favourably disposed towards small local shops.

For pomegranates, it is often crucial to have a good importing partner to supply different retail channels. Importers or distributors differ in their relationships to the retail sector. Some are suppliers for private-label products, while others have their own brands or market the brands of specific producers (cooperation).

Tips:

- Seek cooperation with buyers with experience in promoting exotic fruit. Choose your importing partner carefully, based on the size of your company or strategy.
- Use databases such as food-companies.com to find potential buyers.
- Find a European importer by presenting yourself at trade fairs such as the Fruit Logistica.
- Read the CBI Tips for finding buyers in the European market for fresh fruit and vegetables.

Pomegranates are a mainstream fruit in ethnic markets

In the Mediterranean region, pomegranates are a common fruit for consumers, but all throughout Europe you can find local shops and street merchants that mainly target ethnic and traditional consumers from Central Asia, the Middle East and the Mediterranean. The United Kingdom has a large Indian community, Germany houses many people with Turkish heritage and there is a significant Moroccan influence in France. Ethnic shopkeepers in these countries have often established supply chains with a link to their origin and specific local varieties.

Coming from these countries, you are in a good position to address these ethnic channels that often work with dedicated wholesalers.

Spain is best positioned for processing

Pomegranates arils are packed or processed into many different products, such as juice and personal care products. If the quality of your product is not good enough for the European fresh market, or if logistical infrastructure is insufficient, you can consider the option of processing. You can either add value yourself or supply your fresh product to a European processor.

Being the leading producer of pomegranates in Europe, Spain will be a good place to look for potential processing channels. Local Spanish producers cultivate commercial varieties such as the Mollar de Elche, Mollar de Valencia and Wonderful. Depending on their characteristics and composition, these fruits can be destined for fresh consumption, industrial processing or medicinal-pharmaceutical purposes.
9. What are the end-market prices for fresh pomegranates?

Europe imports pomegranates throughout the year. The highest import volumes from outside Europe are in May. During this peak in May, wholesale prices for pomegranates vary between €1.80/kg and €3/kg for ‘Wonderful’ pomegranates. Prices are dependent upon the mode of transport and quality of the fruit.

The following list of consumer prices for pomegranates in supermarkets in different European countries provides an indication of the price level in the northern European countries. Supermarket prices represent the upper price segment (premium red pomegranates, large size). It is important to remember that much less expensive pomegranates are available (for example, at street markets during pomegranate season). Quantity discounts are common. Consumer prices in southern European countries are significantly lower, especially during the production season.

Table 2: An example of consumer prices for pomegranates (data from 2015-2018)

<table>
<thead>
<tr>
<th>Product</th>
<th>Price</th>
<th>Country/Supermarket chain</th>
</tr>
</thead>
<tbody>
<tr>
<td>1x pomegranate (Israel)</td>
<td>€1.40</td>
<td>France/Auchan</td>
</tr>
<tr>
<td>1x pomegranate</td>
<td>€1.12 - 1.75</td>
<td>United Kingdom/Tesco</td>
</tr>
<tr>
<td>80 g pomegranate arils</td>
<td>€1.00 - 1.12</td>
<td>United Kingdom/Tesco</td>
</tr>
<tr>
<td>1x pomegranate</td>
<td>€1.49 - 1.79</td>
<td>Netherlands/Albert Heijn</td>
</tr>
<tr>
<td>100 g pomegranate arils</td>
<td>€2.00</td>
<td>Netherlands/Albert Heijn</td>
</tr>
<tr>
<td>1 kg fresh pomegranates</td>
<td>€2.90 - 3.95</td>
<td>Spain/Hipercor</td>
</tr>
<tr>
<td>125 g pomegranate arils</td>
<td>€2.95</td>
<td>Spain/Hipercor</td>
</tr>
<tr>
<td>1x pomegranate</td>
<td>€1.19 - 1.49</td>
<td>Germany/Rewe</td>
</tr>
<tr>
<td>1x pomegranate</td>
<td>€0.79 - 1.29</td>
<td>Germany/Nett Marken, Kaufland, LEDO</td>
</tr>
</tbody>
</table>
Tip:
Check retail prices through the online shops or assortments of supermarket chains such as Tesco, Albert Heijn (‘granaatappel’), Rewe (‘granatapfel’) or Hipercor (‘granada’). Be aware that these prices have little to no connection with international trade prices.

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