

What requirements must grains, pulses and oilseeds comply with to be allowed on the European market?

As an exporter of grains, pulses and oilseeds you must comply with strict food safety protocols, such as working with HACCP, keeping contaminants and pesticide residues below the permitted limits as well as following specific legislation for novel food and sprouted grains and pulses. Buyers in Europe will avoid any risks and often ask for additional certification and proof of good conduct. Complying with additional and niche standards can help your company stand out from the competition.

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1. What are mandatory requirements?

Food safety: Traceability, hygiene and control

Food safety is a key issue in European food legislation and regulated by the [General Food Law](#). To guarantee food safety and to allow appropriate action in cases of unsafe food, food products must be traceable throughout the entire supply chain and risks of contamination must be reduced as much as possible.

Food operators in Europe are responsible for the safety of the products they sell. This also affects you as a supplier, because you are expected to control your supply chain according to the guidelines of [Hazard Analysis and Critical Control Points \(HACCP\)](#).

When you export grains, pulses or oilseeds, your product will be subject to official controls. Products that are considered unsafe will be denied access to the European Union. The [Rapid Alert System for Food and Feed \(RASFF\)](#) registers potential hazards and informs other European member states about the measures taken.

Food safety will continue to be a top priority in the grains, pulses and oilseeds trade. Non-compliance can lead to temporary import stops or to stricter control of products from your origin.

Tips:

Read more about [Food Safety and Risk Management](#) and use the [Manual on the Application of the HACCP System in Mycotoxin Prevention and Control](#) on the website of the Food and Agriculture Organisation (FAO).

Comply with the general hygiene provisions in the [Regulation \(EC\) No 853/2004](#) for primary production (Annex I) and for food business operators (Annex II).

Visit the EU Trade Helpdesk for more [information on import rules and taxes in the European Union](#). Specific product codes can be selected under chapters 0713 (Pulses), 10 (Cereal grains) and 12 (Seeds).

Read [the key obligations of food and feed business operators](#) on the one-pager of the European Commission.

Phytosanitary regulation

Some products have extra phytosanitary requirements when being commercialised in Europe. For grains and pulses, you must have an official statement that your product is free from specific diseases or comes from an area where these diseases are not found. This includes, for example:

- pulses (seeds of Phaseolus genus) that must be free from the bacteria Xanthomonas campestris;
- wheat, rye, barley and other grains of the genus Triticum and Secale, that originate in Afghanistan, India, Iraq, Mexico, Nepal, Pakistan and the United States, which must be free from Tilletia indica Mitra.
- maize that needs to be declared officially free from Erwinia stewartii.

Tip:

Familiarise yourself with the phytosanitary rules to export to Europe laid out in the [Council Directive 2000/29/EC](#) on the protective measures against the introduction of harmful organisms in the European community.

Limited use of agro-chemicals

The European Union has set maximum residue levels (MRLs) for pesticides and other chemicals (active substances) in and on food products. Strict compliance with these MRLs are necessary to enter the European market. Products containing illegal pesticides or excessive chemical residues will be withdrawn from the European market.

Note that the MRLs applied by buyers in some countries are often stricter than those specified in [European legislation](#). These stricter requirements are often enforced by large retail chains such as in Germany. Especially in the case of special and healthy food ingredients, European laboratory testing can be rigorous and more precise than in the country of origin. The slightest exceedance can be a reason for the buyer to decline your product.

The approval of all active substances is periodically reviewed. For suppliers of grains, pulses and oilseeds this means the maximum residue limits and legally allowed pesticides are subject to change. For example, there is a growing resistance against the herbicide Glyphosate, and [its use and safety will be reviewed again after 2022](#).

Tips:

Use the [MRL database](#) to identify the MRLs that are relevant for your products. After selecting a product or pesticide used, the database shows the list of the maximum allowed residue levels.

Apply integrated pest management (IPM) to reduce the amount of pesticides. This agricultural pest-control strategy uses natural control practices. The fewer chemicals you use, the better your marketing position will be. The FAO website provides [information about IPM](#).

Check with your buyers to determine whether they have additional requirements relating to MRLs and pesticide use. Expect your product and product samples to be subject to thorough testing. The laboratory tests in Europe may be more extensive than those in your own country.

Contaminants

Contaminants are substances that have not been intentionally added to food, but which may be present as a result of the various stages during production, packaging, transport or holding. To avoid the negative impact of contamination on the quality of food and the risk to human health, the European Union has set limits for several contaminants such as heavy metals and mycotoxins.

Common microbiological contaminations in grains, pulses and oilseeds are for example aflatoxins in oilseeds or cadmium in wheat or soybean.

Tips:

Maintain high-quality post-harvest and storage procedures and avoid product rejection due to mould (mycotoxins).

Find the legal limits of relevant contaminant levels in your product or product group in the annex of [Regulation \(EC\) 1881/2006](#) (starting on page 20).

Check the European Commission's factsheet on food contaminants '[Managing food contaminants: how the EU ensures that our food is safe](#)' and the FAO publication '[Mycotoxin prevention and control in food grains](#)'.

Novel Food

Products that are new in the European food market, or products that were not widely consumed in the EU prior to 1997, are considered 'novel foods' and have specific legislation. Before introducing a new ingredient as a foodstuff, you must provide data proving it is safe for consumption within its suggested use and you must apply for an authorisation. Food ingredients that are already approved can be found on the [union list of novel foods](#).

Follow the steps below when introducing a new food into the European Union, but take in mind that an application can be time consuming and expensive due to the scientific proof and technical data that is requested:

- Start with a [consultation process](#) to confirm if your product is really a novel food. In earlier consultations, you can see for example that [mung bean protein isolate is novel](#) when used in foods and [cold-pressed Nigella sativa \(black cumin\) seed oil is not novel](#) and has no restrictions.
- Find out if you have substantial evidence of a traditional consumption, because traditional foods from third countries have a simplified assessment procedure. If the safety of the traditional food can be established based on the evidence of a consumption history, and there are no safety concerns raised in the European Union, the traditional food will be allowed to enter the European Union market.
- Collect technical and scientific data of the novel food. Find out what type of data is required in [chapter 2 of the guidance documents for the authorisation of traditional foods from third countries](#), or in [chapter 2 of the guidance document for the authorisation of a novel food](#).
- Submit an [online application](#) for authorisation in line with the requirements of [Article 10 of the new Regulation](#). Use the [User Guide for the e-submission system for Novel Foods](#).

The assessment and authorisation procedure for a novel food can take up to 1.5 years, excluding the data collection you must do yourself.

Among the products that are currently included in the Novel Food regulation are, for example, chia seeds, fonio and cañihua/kañiwa. It will likely take many years for a Novel Food product to be assessed to be accepted as a regular food stuff.

Tips:

When introducing a novel product in the European Union, consult with the food safety authorities to determine whether your product is actually considered a [novel food](#). Novel food requires a special authorisation or notification. Use the [Novel Food Catalogue](#).

Read the specifics of the [Regulation \(EU\) 2015/2283 on novel foods](#) when you are working with a novel food.

Sprouted seeds

After an outbreak of E. coli in 2011, the European Union introduced specific regulations for sprouts and seeds intended for the production of sprouts. The import of sprouts and seeds for sprouting into the European Union must be accompanied by a certificate and be produced by an approved establishment that complies with the general hygiene provisions, traceability and the microbiological criteria.

The sprouting of seeds, such as mung beans, is almost exclusively done within Europe. When you export seeds to sprouting companies, you will have to deal with extra paper work and a higher chance of intensive food safety checks.

Tips:

Find the type of certificate you will need for the export of seeds intended for sprouting in the Annex of [Regulation \(EU\) No 211/2013](#).

Make sure you understand the European requirements on the general hygiene provisions for primary production (Part A of Annex I to [Regulation \(EC\) No 853/2004](#)), product traceability ([Regulation \(EU\) No 208/2013](#)), approved establishments (Article 2 of [Regulation \(EU\) No 210/2013](#)) and the microbiological criteria (Annex I to [Regulation \(EC\) No 2073/2005](#)).

Use extreme caution and apply the highest safety standards when exporting dried or fresh sprouted grains or pulses, using a HACCP-based food safety system and UV-C disinfection to avoid the risk of salmonella and e. coli.

No GMOs

The European Union is very cautious towards genetically modified organisms (GMOs). Only a few genetically modified varieties have been authorised for soybeans, rapeseed and maize, and they are used primarily in the animal feed sector. For human consumption, most food businesses choose not to sell genetically modified food at all.

According to World-grain.com [95% of all GM crops grown in the E.U. is genetically modified maize grown in Spain](#).

Tips:

Sell only non-GMO products if your product is destined for human consumption. In general, genetically modified crops are not accepted. The exceptions such as maize and soybean can be found in the [EU](#)

[register of authorised GMOs](#).

Use the [EU factsheet](#) to review the current legislation on GMOs in Europe.

Marketing standards

Each product has its own characteristics, which are often documented in a marketing standard. The [Codex Alimentarius](#) provides standards for several grains and pulses, such as [couscous](#), [sorghum grains](#), [rice](#) and [whole, shelled or split pulses](#) (beans, lentils, peas, chickpeas, field beans, and cowpeas). These standards cover characteristics such as moisture, purity, grain quality and appearance. Not all products are covered, but this does not mean that buyers of such products operate without a standard.

Tip:

Ask your buyer for technical data sheets. This will give you an indication of the product characteristics you have to supply. See as an example the [product specifications of organic adzuki beans](#) of the company DO-IT BV.

Labelling

Food placed on the European market must conform to the following legislation on food labelling:

- Generic name and, if applicable, its treatment;
- List of ingredients, including allergens;
- Net quantity;
- Date of minimum durability;
- Special conditions for keeping or use;
- Name and address of the manufacturer, packager or importer;
- Place of origin;
- Lot marking on pre-packaged foodstuffs.

Novel food and genetically modified foods require additional labelling.

Image 1: Business-to-business labelling

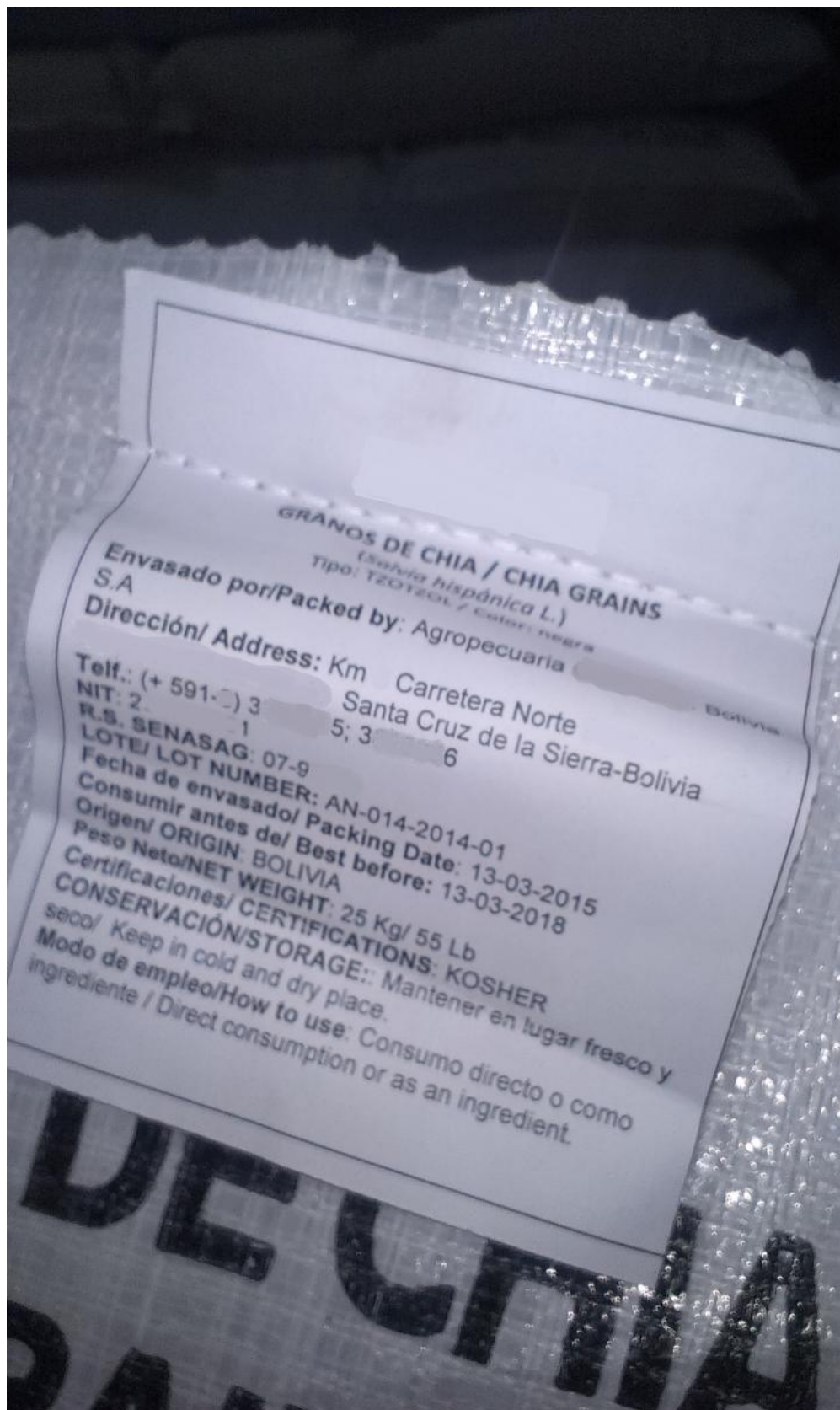


Photo made by [ICI Business](#)

Image 2: Consumer labelling

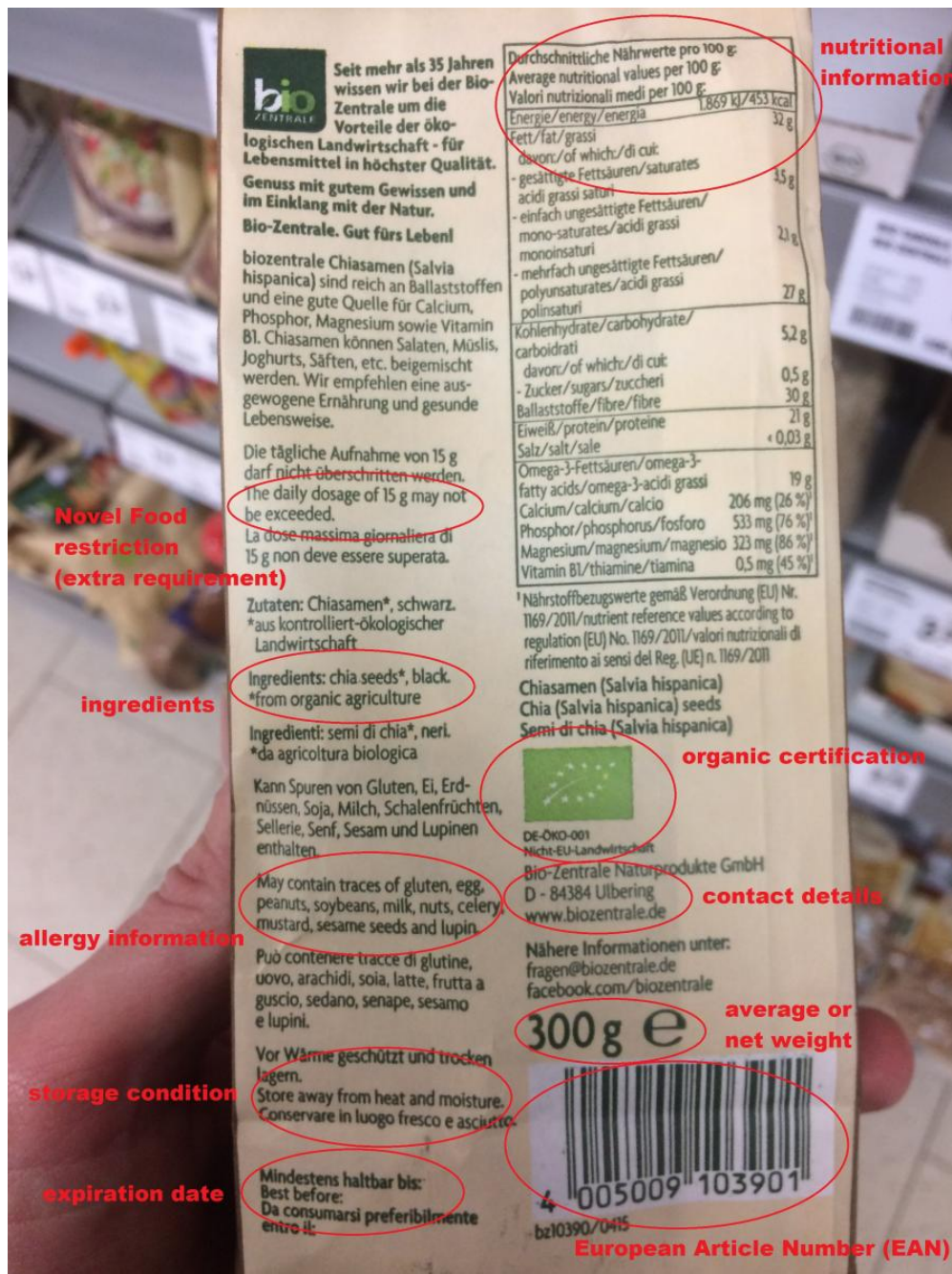


Photo made by ICI Business

Tips:

Make sure that the label mentions all mandatory information, in addition to considering other useful information (e.g. logos of importers or certificates). Read more about [labelling and packaging guidelines for foodstuffs in the EU Trade Helpdesk](#).

Avoid making health or nutrition claims that are not supported by European legislation. Check with the [EU Register of Nutrition and Health claims](#) first.

Contact Open Trade Gate Sweden if you have [specific questions regarding rules and requirements in Sweden and the European Union](#).

Make sure that the accompanying documents (e.g. bill of lading) correspond exactly with the food products contained in the consignment, including the indicated volumes, number of pallets and boxes, and names of growers.

2. What additional requirements do buyers often have?

Certification as a guarantee

Since food safety is a top priority, most buyers are likely to request additional guarantees in the form of certifications. European food businesses are legally required to have a food safety management system based on the principles of [Hazard Analysis and Critical Control Points \(HACCP\)](#). Many buyers in Europe (e.g. traders, food processors, retailers) require the same from you as a foreign supplier.

Food safety management systems and certifications that are recognised by the [Global Food Safety Initiative \(GFSI\)](#) are widely accepted throughout Europe. The following are the most significant certifications:

- [GLOBALG.A.P.](#) – a farm standard for good agricultural practices, covering the process from farm input to a non-processed product
- [FSSC 22000 / ISO 22000](#) – International standard for food safety management. FSSC 22000 is based on ISO 22000 and aimed specifically at food manufacturers. These certifications include HACCP.
- [BRC Global Standard \(BRCGS\) for Food Safety](#) provides technical standards for food safety, consumer products, packaging, storing and distribution, and is a widely accepted standard in Europe.
- [IFS International Featured Standards](#) – Safety standard for food processors and packers
- [GMP+](#) – International standard for feed safety and responsibility throughout the supply chain for animal feed

The preferred certification schemes can vary between specific markets and buyers. Either way, the pressure of certification has increased on suppliers and will continue to do so.

Tips:

Implement a food safety management system. Check the [FAO Guidelines for the implementation of HACCP](#).

Read more on the different Food Safety Management Systems and hygiene standards in the [Standards Map](#), or consult the [Global Food Safety Initiative \(GFSI\)](#). Different market channels and European regions may have different preferences for particular food safety standards. Check with your buyers to determine which systems they prefer.

Social and environmental practices

Social and environmental practices have become a pre-condition for the export of grains, pulses and oilseeds, which has resulted in a variety of private and collective standards that you must take into account.

Food businesses in Europe are increasingly paying attention to their corporate responsibilities with regard to the social and environmental impact of their businesses. This has led a number of supermarket chains and large industrial players to develop their own Corporate Social Responsibility (CSR) and sourcing policies. Smaller buyers have also incorporated social and sustainable practices into their business policies.

While the market increasingly desires transparency in food supply chains, actors in the supply chain are becoming more risk-averse and demanding. How this affects you as a supplier is through the extra proof you must show by filling in forms or signing a code of conduct, declaring you conduct your business in a responsible manner. Most buyers will visit you regularly.

Social compliance is supported by several important initiatives, which buyers often refer to, such as:

- Amfori BSCI ([Amfori BSCI code of conduct](#))
- Sedex Members Ethical Trade Audit ([SMETA](#))
- [Ethical Trading Initiative](#) (ETI).

Larger commodities are sometimes part of a specific initiative, such as the Round Table on Responsible Soy ([RTRS standard](#)) and the Sustainable Rice Platform ([voluntary sustainability standard for rice 2.0](#)). The [IDH, the sustainable trade initiative](#) has defined targets for a responsible and zero-net-deforestation soy import.

Tips:

Check the current performance of your company by completing [a self-assessment on the amfori BSCI website](#). This will help you focus on specific improvement points. Plan ahead and focus on the ones that are most relevant to your product and target market.

For a full overview of certification schemes in the sector, consult [ITC Sustainability Map](#).

Follow the [GSCP Environmental Implementation Guidelines](#) on the Consumer goods forum to reduce your environmental impact.

3. What are the requirements for niche markets?

In addition to the official and common requirements, specific requirements apply to niche markets (such as for organic grains and pulses or fair-trade products). These requirements can be particularly important for specific consumer groups or in the health-food segment.

Organic, a growing niche market

Consumers in Europe increasingly prefer food products that are produced and processed using natural and sustainable methods. Organic certification is often used for food products associated with health benefits. For example, the European market for quinoa has been developed entirely by organic trading companies.

In order to market organic products in the European Union, you must use organic production methods, which are specified in [European legislation](#). You must have used these production methods for at least two years throughout the conversion period before you can certify your grains, pulses or oilseeds as organic.

If you wish to become an organic farmer or exporter, you must be registered and certified through a recognised control body. The control agency or body is responsible for verifying that the operator acts in compliance with organic rules. A yearly inspection and a set of checks make sure that you are complying with the rules on organic production.

After being audited by an accredited certifier, you can use the [EU organic logo](#) on your products, along with the logo of the standard holder.

All organic products imported into the EU must have the appropriate electronic certificate of inspection (e-COI). These are administered through the [Trade Control and Expert System \(TRACES\)](#). If you do not have an electronic certificate of inspection, your products will not be released from their port of arrival in the European Union.

In 2021, the [new organic regulation \(EU\) 2018/848](#) will enter into force, together with the new Official Control Regulation. Besides checking the compliance with European rules for imported products, it will also reinforce the controls and enhance possible actions against fraudsters. As a third-country producer, you will have to comply with the same set of rules as those producers in the European Union.

Tips:

Assess the market potential for your organic product. Implementing organic production and becoming certified can be expensive. When you decide to become a supplier of organic grains, pulses or oilseeds, read the [organic farming guidelines in the EU](#), and see the [current list of control bodies](#) active in your country.

Find importers specialised in organic products through directories such as the [International directory of organic food wholesale & supply companies](#) (Organic-bio) or participate in trade fairs for organic products such as [Biofach](#) in Germany.

Get familiar with the current [Regulation \(EC\) No 834/2007](#) on organic production and labelling of organic products and the [Regulation \(EC\) No 1235/2008](#), which lays down detailed rules for implementation. You should also know what to expect from the [new organic regulation \(EU\) 2018/848](#) by reading the [factsheet and frequently asked questions about the new organic regulation](#).

Fair trade and environmental certification

Fair trade and sustainable certification are niche requirements that can help your product stand out from the masses and attract the more conscious consumers. These certification labels are consumer-focused and best applicable to products from smallholder farms. Well-known labels include [Fair for Life](#), [Rainforest Alliance](#) and [Fairtrade](#). Fairtrade International (FLO) introduced a new [fair trade standard for cereals](#) in 2016.

Tips:


Consult the [Standards Map database](#) for a list of labels, along with their similarities and differences. Enter your product, country and destination country to find certification schemes that fit your product.


Find a specialised European buyer who is familiar with sustainable or fair-trade products.


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

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