



CBI
Ministry of Foreign Affairs

CBI Buyer Requirements:

Fresh Fruit and Vegetables in Europe

Introduction

Europe is very demanding about food safety, which is why dealing with fresh agricultural products is subject to various legal and other buyer requirements. But there are also opportunities to distinguish yourself by applying additional or niche market quality standards. This document provides an overview of the most common requirements and standards, as well as the specific requirements that apply to niche markets such as organic or fair trade fruit and vegetables.

With which legal and non-legal requirements must my product comply?

When exporting fresh fruit and vegetables to Europe you have to comply with the following requirements. For a full list of requirements, please consult the [EU Export Helpdesk](#) where you can select your specific product code under chapters 07 and 08.

Limited use of pesticides

The European Union (EU) has set maximum residue levels (MRLs) for pesticides in and on food products. Strict compliance with MRLs and the prevention of microbial contamination are preconditions for entering the European market. Products containing illegal pesticides or higher amounts than allowed will be withdrawn from the EU market. Note that buyers in several Member States use MRLs, which are stricter than the MRLs laid down in EU legislation. Most supermarkets have their own standards (codes of practices) regarding pesticides, which are stricter than legislation. Your buyer will then also impose them on your products.

Tips:

- Use the [EU Pesticide Database](#) to find out the MRLs that are relevant for your products. You can select your product or pesticide used and the database shows the list of the MRLs associated to your product or pesticide. Read more about [MRLs](#) in the EU Export Helpdesk.
- Apply integrated pest management (IPM) to reduce the amount of pesticides. IPM is an agricultural pest control strategy, which is also part of a [GlobalGAP](#) certification. It uses natural control practices such as importation of pests' natural enemies. The fewer chemicals you use, the better your marketing position will be for export to Europe.
- Check if your buyers have additional requirements on MRLs and pesticide use.

Control of food imported to the EU

To ensure food safety and avoid environmental damage, the EU has restricted the use of certain chemicals (MRLs) in several Regulations and Directives. Therefore, your products will be subjected to official controls. These controls are carried out to ensure that all foods marketed in the EU market are safe, i.e. in compliance with all applicable regulatory requirements. There are three types of checks:

- a) Documentary checks
- b) Identity checks
- c) Physical checks

In the event of repeated non-compliance of specific products originating from particular countries, the EU can decide to carry out controls at an increased level or to lay down emergency measures. Controls can be carried out at all stages of import and marketing in the EU. However, most checks are done at the points of entry in the EU.

For importers of fresh fruit and vegetables, the [traceability](#) of products is compulsory. To fulfil this obligation, importers in the EU will require you to provide proof of the origin of all fruits and vegetables with a Bill of Lading, phytosanitary certificate, packing list and custom documentation.

Tips:

- Familiarize yourself with the procedures. Failure to follow the right procedures could cause decrease and delay of orders, increase costs, and result in actions by EU enforcement authorities.
- Make sure that the accompanying documents (such as bill of lading) correspond exactly with the food products contained in the consignment, including indicated volumes, classes and sizes, number of pallets and boxes and the names of growers.
- Read more about [health control of foodstuffs](#) in the EU Export Helpdesk.

Marketing standards

EU legislation sets general and specific [marketing standards](#) for the minimum quality and the minimum maturity of all fresh fruit and vegetables.

There are specific marketing standards (MS) for the following fresh fruit and vegetables: apples, citrus fruit, kiwi fruit, lettuce, peaches and nectarines, pears, strawberries, sweet peppers, table grapes and tomatoes. These products must be accompanied with a certificate of conformity with each consignment. A sample [certificate of conformity](#) can be found on page 115 in Annex III to EU Regulation No 543/2011. Fresh products that are not covered by a specific marketing standard have to comply with the general marketing standards (GMS) or the [applicable UNECE standard](#) (sometimes less strict than the EU standard). Operators are free to choose which to use. Imports of products intended for processing are not subject to compliance with the EU marketing standards. However, these must be clearly marked by the pack with the words "intended for processing" or other equivalent wording.

Tips:

- Check which standards are applicable to your product and make sure your products and the necessary documentation are in order. By filling in your export details at the [EU Export Helpdesk](#) (product codes in chapter 7 or 8) you can find the contact details of the official authorities by following the link on marketing standards.
- Check out the [Codex Alimentarius](#) published by the Food and Agriculture Organization (FAO) with marketing standards for fresh fruits and vegetables.

Labelling and packaging

Food placed on the EU market must meet the legislation on food labelling.

Cartons of fresh fruit or vegetables must mention the following particulars:

- The name and the address of the packer and the dispatchers
- The name of the produce (if the produce is not visible from the outside of the packaging)
- The country of origin
- The class and size (referring to the marketing standards)
- Lot number for traceability

Note that there is also non product specific legislation on [packaging](#) and [liability](#) that apply to all goods marketed in the EU.

Tips:

- Make sure that all mandatory information is mentioned, but also think of other useful information such as logos of importers or certificates.
- For pre-packed fruit and vegetables for consumers, read the full regulation concerning [labelling for foodstuffs](#) at the EU Export Helpdesk.

Plant Health

Fruit and vegetables exported to the EU, must comply with the EU legislation on plant health. The EU has laid down phytosanitary requirements to prevent introduction and spread of organisms harmful to plants and plant products in the EU. The requirements mainly imply that:

- Certain listed organisms are not allowed to be imported into the EU, unless specific circumstances apply.
- Plants or plant products specified in Part B, Annex V of Directive [2000/29/EC](#) must be accompanied by a plant health certificate.

Tips:

- If a phytosanitary certificate is needed for EU entry (consult the [EU Export Helpdesk](#)), arrange one with your National Plant Protection Organisation (NPPO) and ask your EU importer for specific requirements. Check the International Plant Protection Convention to [find the NPPO](#) in your home country.
- Read more about [plant health](#) at the EU Export Helpdesk. A model phytosanitary certificate can be found through [Annex VII](#) (p.170) of the Plant Health Directive.

Contaminants

Contaminants are substances that have not been intentionally added to food, but may be present as a result of the various stages of its production, packaging, transport or holding. To avoid negative impact on the quality of food and

risks to human health, the EU has set limits for several contaminants. Especially the limits for nitrate (in spinach and lettuce) and metals (cadmium, lead, mercury and inorganic tin) are relevant for fresh fruit and vegetables.

Tips:

- Find the relevant [contaminant levels](#) in the annex of Regulation (EC) 1881/2006. Check if your food product is included in one of the product groups. Be aware that the particular product may not be mentioned specifically but can be included in a product group. For instance, mango may not be found, but fruit can.
- Find out more about prevention and reduction of lead contamination in the [Code of Practice](#) published by the Codex Alimentarius.
- Check the European Commission's factsheet on food contaminants: "[Managing food contaminants: how the EU ensures that our food is safe](#)".
- Read [more about contaminants](#) or consult the [EU Export Helpdesk](#).

Which additional requirements are buyers likely to impose?

European buyers often have specific requirements, depending upon their sales channels and product segments. Common buyer requirements include the following:

Certification as guarantee

As food safety is a top priority in all EU food sectors, you can expect most buyers to request extra guarantees from you in the form of a certification. Many EU buyers (for example traders, food processors, retailers) require the implementation of a food safety management system based on Hazard Analysis and Critical Control Point ([HACCP](#)).

The most commonly requested food safety certification scheme, essential for exporting fresh produce to Europe, is [GLOBALG.A.P.](#) This is 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 (processing not covered). GLOBALG.A.P. has become a minimum standard for most European supermarkets.

In addition to GLOBALG.A.P., other food safety management systems can be required as well. Almost all buyers on the North-Western European market will require you to comply with the British Retail Consortium ([BRC global standards](#)), which are widely applied as a standard for hygiene and safety. On the European mainland, buyers sometimes require you to comply with the [IFS food standard](#), Safe Quality Food ([SQF](#)) programme, [FSSC22000](#) or other industry-developed standards.

All the mentioned management systems are recognized by the [Global Food Safety Initiative \(GFSI\)](#), which means that they should all be accepted by the major retailers. Compliance with certification schemes varies between countries, trade channels and market situations. Buyers can be more lenient during supply shortages.

Tips:

- Read more on the different Food Safety Management Systems and hygiene standards at the [Standards Map](#) or consult the [Global Food Safety Initiative \(GFSI\)](#). It contains a benchmark for relevant additional standards.
- Become familiar with [GLOBALG.A.P.](#) as your EU market entry preparation is likely to include GLOBALG.A.P. certification.
- Buyers and EU regions may have different preferences for certain management systems, so before considering certification against one of the standards, check which one your buyer prefers.

Quality specifications

Quality is integrated in food safety requirements and marketing standards. At the same time, buyers use their own specific quality specifications. The importance of quality is not to be underestimated. There are many claims from buyers on quality of fresh fruit and vegetables because they are perishable products. In this fast moving and perishable market 'sudden' decisions are taken, such as 'dumping' your products at very low prices when quality starts to deteriorate.

The standards that are most widely used by EU importers and traders are those developed by the United Nations Economic Commission for Europe ([UNECE](#)) and the [Codex Alimentarius Commission](#) (CAC). Note that these standards remain subject to legally required [marketing standards](#).

Tips:

- Agree with your buyer on important topics:
- Delivery and payment terms
- Specifications
- The certification scheme(s) that will be used
- Be on top of quality! If you are not sure, do not send your products, but rather look for (local) alternatives. If you decide to ship your products anyway, be transparent about the quality and discuss this on beforehand with your buyer.

What are the requirements for niche markets?

In addition to the official and common requirements, specific requirements apply to niche markets such as organic or fair trade fruit and vegetables.

Social compliance

Although compliance with particular social standards is not yet required everywhere, these standards are expected to become crucial within the next few years. Initiatives and attention relating to Corporate Social Responsibility (CSR) vary across the various parts of Europe.

The [Business Social Compliance Initiative](#) (BSCI) is a leading business-driven initiative for companies that are committed to improving working conditions within the global supply chain. The BSCI is required predominantly on the European mainland. In the UK market, requirements for social responsibility focus on the [Ethical Trading Initiative](#) (ETI). In the Eastern part of Europe, fewer buyers require social compliance, while in Western Europe some multinationals even have their own codes of conduct. Examples include Unilever's [Sustainable Agriculture Code](#) and [Tesco's nurture](#) accreditation. Other well-known standards and social consumer labels for fresh products are [Fair for Life](#), Global Social Compliance Programme ([GSCP](#)), [Rainforest Alliance](#) (as part of the Sustainable Agriculture Network), [Fairtrade](#) and [IDH The sustainable trade initiative](#).

Tips:

- Consult the [ITC Standards Map](#) for the different labels and their similarities and differences.
- Check your company's current performances. For example by doing a self-assessment on the [BSCI website](#).
- If you choose to produce sustainably, find a specialised European buyer who is familiar with sustainable products and all of the various labels in the market.

Organic, a growing niche market

An increasing number of EU consumers prefer food products that are produced and processed using natural methods. Organic fruit and vegetables have a higher cost of production, but are also better valued on the European market. To market organic products in the EU, you have to use organic production methods, which are laid down in [EU legislation](#). Furthermore, you have to use these production methods for at least two years before you can market the fruits and vegetables as organic. In addition, you (or your EU importer) must apply for an import authorization from EU organic control bodies. After being audited by an accredited certifier, you may put the EU organic logo on your products, as well as the logo of the standard holder, for example [Soil Association](#) (especially relevant in the UK), [Naturland](#) (Germany) or [BioSuisse](#) (Switzerland). Each standard is slightly different, but they all comply with the EU legislation on organic production and labelling.

The European Commission has presented [a proposal](#) for new legislation in 2014 for the amendment of the current regulation for organic farming. This proposal includes stricter rules for organic trade and a reciprocal recognition of certification authorities between the EU member state and the country of origin.

If passed, the new legislation will be implemented mid-2017. One of the [concerns](#) for exporters and producers from developing countries with completely different environments is that they will have to deal with legislation created for European conditions. Despite the complexity, organic production can be a very interesting niche because often there is not enough supply to meet European demand.

More information on the new proposal for organic farming can be found in the press release and [frequently asked questions](#).

Tips:

- Assess the organic market potential for your specific product. Inform yourself well, because implementing organic production and becoming certified can be expensive and time-consuming.
- Find importers that specialise in organics through trade fairs such as [Biofach](#) or [Fruit Logistica](#) and company directories such as the International directory of organic food wholesale & supply companies ([Organic-bio](#)) and the International Trade Centre ([ITC](#)). Organic importers often play an active role in advisory and guidance of producers.
- Read more about organic farming on an [informative website](#) of the European Commission.



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