CBI Buyer Requirements:

Processed fruit and vegetables and edible nuts in Europe
Introduction

All foods sold in the European Union, including processed fruits and vegetables, must be safe. This applies to imported products as well. Additives must be approved. Harmful pesticide residues are prohibited. The maximum levels for several pesticides have changed since 2015. In addition, the new labelling regulations that have recently taken effect require product labels to contain clear indications of any allergens contained within the product.

Fruit-juice associations in Europe have already initiated industrial self-control quality practices, and this can be seen as a role model for other food-industry sectors in the future.

Corporate social responsibility (CSR) is slowly being integrated into product-quality requirements.

Legal requirements are a must – food safety and informing consumers correctly

Here you can find requirements you must meet when marketing your products in the EU. Pay attention to the indications of which materials / products are concerned per requirement described.

The following ‘musts’ apply to the products and uses listed here:

- **Food safety and health control** – applicable to all food products
- **Contamination** – applicable to all food products
- **Composition** – for all food products; specific requirements for fruit juices and fruit jams, jellies, marmalade and sweetened chestnut purée apply
- **Labelling** – for all pre-packed food products; specific requirements for fruit juices and fruit jams, jellies, marmalade and sweetened chestnut purée apply
- **Food contact materials** – applicable to all food products

Food safety: Traceability, hygiene and control

Food safety is a key issue in EU food legislation. The General Food Law is the legislative framework regulation for food safety in the EU. 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 limited. An important aspect to control food safety hazards is defining critical control points (HACCP) by implementing food management principles. Another important aspect is subjecting food products to official controls. Products that are not considered safe will be denied access to the EU.

Control of food imported to the EU

In the event of repeated non-compliance of specific products originating from particular countries can only be imported under stricter conditions such as having to be accompanied with a health certificate and analytical test report.

Products from countries that have shown repeated non-compliance are placed on a list included in the Annex of Regulation (EC) 669/2009. As of 23 March 2016, the following processed fruits and vegetables have been included on the stricter inspection list:

- Almonds from Australia (increased control for aflatoxins)
- Dried apricots from Turkey and Uzbekistan (increased control for sulphites)
- Dried grapes from Afghanistan (increased control for Ochratoxin A)
- Dried lemons from Turkey (increased control for pesticide residues)
- Frozen raspberries from Serbia (increased control for norovirus)
- Frozen sweet peppers from Dominican Republic (increased control for pesticide residues)
- Peanut butter from Gambia, Madagascar and Sudan (increased control for aflatoxins)
- Peanuts from Gambia, Madagascar and Sudan (increased control for aflatoxins)
- Pistachios from United States (increased control for aflatoxins)
- Preserved apricots from Turkey, Uzbekistan (increased control for sulphites)
- Preserved vine leaves from Turkey (increased control for sulphites and pesticide residues)
specific contaminants limits for certain products. The European food safety regulations are frequently updated and apart from the limits set for general foodstuffs there is a number of transport or storage. The European Contaminants are substances that may be present as a result of the various stages of its growing, processing, packaging, transport or storage. The European Regulation (EC) No 1881/2006 specifies maximum levels for certain contaminants in foodstuffs. This regulation is frequently updated and apart from the limits set for general foodstuffs there is a number of specific contaminants limits for certain products. The most common contaminants for processed fruit and vegetables are:

- **Mycotoxins** - toxic secondary metabolites produced by fungi commonly known as moulds. The most common mycotoxin contaminations in the PFV sector are aflatoxins and ochratoxin A.
  - Aflatoxins: limits have been set for aflatoxins B1, B2, G1 and G2 in most edible nuts and dried fruit. In the edible nuts and dried fruit and vegetables subsector aflatoxins are the most common contaminant. According to the RASFF notifications, there were nearly 300 cases of contaminations in dried fruits and nuts in the EU in 2015, due to high levels of aflatoxins. The highest numbers of reported cases were from Turkey (101), China (97), Iran (55) and the United States (37). The most sensitive products were pistachios, dried figs, peanuts (groundnuts) and hazelnuts.
  - Ochratoxin A: applies to dried vine fruit (currants, raisins and sultanas) and grape juice (see section 2 of Annex of Regulation (EC) No 1881/2006). OTA is hard to prevent as it has a lot to do with climatic conditions. In 2015, there were 42 notifications of high ochratoxin levels. The most sensitive products were dried figs, dried grapes, pumpkin seeds and dried chilli peppers.
  - Patulin is especially associated with a range of mouldy fruits and vegetables, in particular rotting apples and figs. For different types of fruit juices limits between 10 and 50 μg/kg apply (see section 2 of Regulation (EC) No 1881/2006). In 2015, there were two notifications of high patulin levels in apple juices.

- **Heavy metals**: there are restrictions for lead (fruit, fruit juices, various kinds of vegetables), cadmium (fruit and vegetables) and tin (canned food and beverages) (see Section 3 of the Annex in Regulation (EC) No 1881/2006). In PFV high lead or cadmium presence can be found in frozen fruit and vegetables but also in colours used on glass packaging materials. Higher concentrations of tin used to be found in canned fruit and vegetables as a result of dissolution of the tin coating or tin plate. Given that many tin cans now have other inside coatings, however, this situation has changed.

- **Microbiological** – the most common types of microbiological contaminants in PFV are salmonella and viruses such as norovirus and Hepatitis A viruses. According to EU legislation salmonella is an important source of contamination in unpasteurised fruit and vegetable juices. It can be also present in other PFV products. Noroviruses and Hepatitis A viruses can be found in frozen fruit. In September 2012, a large outbreak of norovirus affecting approximately 11,000 people was reported in Germany. This outbreak was associated with a large consignment of frozen strawberries imported from China. As a result of this outbreak, a revision was made to Regulation (EC) No 669/2009, to include frozen strawberries from China.

- **Pesticides**: The EU has set maximum residue levels (MRLs) for pesticides in and on food products. Products containing more pesticides than allowed will be withdrawn from the EU market. The general public is highly concerned about pesticide residues. Both government organisations and non-governmental organisations (NGOs) frequently conduct sampling and testing, which often leads to public blaming andshaming of the industry when residues are found.
  - A number of changes to this regulation. In January 2016, the European Union announced four changes regarding MRLs for a number of fruits, vegetables and olive oils. In case a specific limit has not been set, a low default value applies as a precautionary measure. The MRLs are increasingly complicating the trade.
  - The new legislation concerning the level of the pesticide Chlorpyrifos, which is scheduled to take effect on 10 August 2016, could have major effects on European imports of dried grapes from Turkey. There is a major
risk that the widespread occurrence of Chlorpyrifos will prevent the currently remaining crop from Turkey from being exported to the EU.

- **Foreign matter**: contamination by foreign matter (e.g. glass particles, plastic and insects) is a threat when food safety procedures are not carefully followed.
- **Nitrates**: The specific maximum level of 2,000 mg NO\(_3\)/kg applies to frozen spinach (see Section 1 of the Annex to Regulation (EC) No 1881/2006)

**Tips:**

- Understand better growing, drying, processing and storage practices and discuss them with your suppliers. For example refer to *Codex Alimentarius codes of practices* for prevention and reduction of aflatoxin contaminations in tree nuts, peanuts and dried figs or *FAO guidance for prevention of aflatoxin in pistachios*.
- For information on safe storage and transport of processed fruit and vegetables and edible nuts go to the [website](#) of the Transport Information Service.
- Consult the sampling and analysis guidelines on the [European Commission page for food contaminants](#).
- Irradiation is a way to combat microbiological contamination but this is not allowed by EU legislation for processed fruit and edible nuts.
- To find out the MRLs that are relevant for your products, you can use the EU MRL database in which all harmonised MRLs can be found. You can search on 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. In organic products no pesticide residues can be found.
- Use expert help for the right advice on implementation of the HACCP system in your daily practices. You need to have tight control of traceability of raw ingredients and to support farmers’ growers in establishing good agricultural practices in order to prevent contamination of final products.
- A good way to reduce the amount of pesticides, is applying integrated pest management (IPM) which is an agricultural pest control strategy that uses complementary strategies including growing practices and chemical management.
- Follow the most recent trends on food safety testing developments. Increased levels of quick tests on site, automation and computerisation of food safety testing methods can help you a lot in your production process. Read the latest news on the web page of the [European Food Safety Authority (EFSA)](#) in order to updated about latest food safety developments.

**Product composition**

Product can be rejected by buyers and EU custom authorities in case they have undeclared, unauthorised or too high limits of extraneous materials. There is specific legislation for additives (e.g. colours, thickeners) and flavourings that list what E-numbers and substances are allowed to be used. In case you want to add vitamins you will have to know which vitamins (see Annex I) and sources, vitamin formulations and mineral substances are allowed (see Annex II). Product specific legislation regarding composition applies to fruit juices and fruit jams, jellies, marmalade and sweetened chestnut pureé. The Directives indicate which raw materials and additives may be used. In PFV common problems occur because of undeclared or too high content of used preservatives. Examples of frequent problems are sulphite used as preservative in dried fruit and coconut products, and benzoic acid in some pickled vegetable products. Another frequent problem is too high or undeclared content of food colours. Typical examples are colour E 110 - Sunset Yellow used in dried candied fruit or colour E 102 - tartrazine which also gives yellow colour and is used in condiments, spreads, pickled products and soft drinks.

**Tip:**

- E-numbers indicate approval by the EU. To obtain an E-number the additive must have been fully evaluated for safety by the competent food safety authorities in the EU (EFCH). An overview of E-numbers is provided in the Annex to Regulation 1333/2008.

**Labelling**

The new Regulation (EU) No 1169/2011 on the provision of food information to consumers entered into force on 13 December 2014. The obligation to provide nutritional information will apply from 13 December 2016.

The practical implications of the labelling regulations include the following:

- Minimum font size for mandatory information
- Clearer and more harmonised presentation of allergens (e.g. soy, nuts, gluten, lactose) for pre-packed foods (with emphasis on font, style or background colour) in the list of ingredients
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- Mandatory allergen information for non pre-packed food, including in restaurants and cafés
- Required nutritional information for the majority of pre-packed processed foods
- List of engineered nano-materials in the ingredients
- Specific information on the vegetable origin of refined oils and fats
- Indication of substitute ingredients for ‘imitation’ foods
- Clear indication of defrosted products
- Some of the obligations (e.g. the minimum font size) relate only to consumer-packed products. Suppliers of bulk products may nevertheless be asked to provide relevant information (e.g. on allergens and composition).

Tips:

- Additional information on general food labelling is available from the EU Export Helpdesk. The guidance document published by Food and Drink Industry Ireland provides information about the new food-labelling legislation. The official guidance document published by European Commission provides information on the control of compliance for the nutrient values declared on a label.
- Note that the presence of allergens is becoming more and more important. The chance of cross-contamination (e.g. when a product is processed in a factory which also process peanuts) is sometimes even considered to be possible at farm level.

Food contact materials

For consumer packaging materials that come in contact with food (e.g. cans, jars), specific health control provisions apply. Food contact materials must be manufactured so that they do not transfer their constituents to food in quantities that could endanger human health, change the composition of the food in an unacceptable way or deteriorate the taste and odour of foodstuffs.

Tips:

- The EU legislation on food contact materials is quite extensive and it is not easy to prove to your EU importer that your product complies with all requirements. You should therefore provide your importers with documentation concerning the toxicity tests that you have conducted and the risk assessments that you have implemented.
- An interesting substance to be aware of is Bisphenol A (BPA). BPA is known for its use in plastic bottles, but is also sometimes used in inner coatings of jar lids. At the moment the use of BPA is still allowed, but there have been several discussion recently and some buyers may require you to not use it.

Full overview of requirements for processed fruit and vegetables and edible nuts:

For a list of requirements consult the EU Export Helpdesk where you can select your specific product code under chapter 07, 08 and 20.

Common requirements: food safety management is crucial, addressing sustainability is gaining ground

Food Safety Certification as a guarantee

As food safety is a top priority in all EU food sectors, you can expect many players to request extra guarantees from you in form of certification. Many EU buyers (e.g. traders, food processors, retailers) require the implementation of a (HACCP-based) food safety management system. The most important food safety management system in the EU are BRC, IFS, FSSC22000 and SQF. Different buyers may have different preferences for a certain management system, so before considering certification against one of these standards, it is advised to check which one is preferred (e.g. UK retailers often require BRC, and IFS is more often required by German retailers). All the mentioned management systems are recognised by the Global Food Safety Initiative (GFSI), which means that any of them should be accepted by major retailers and manufacturers. However, in practice some buyers still have preferences for one specific management system.

In the fruit juice industry, the most recent development is SGF certification. The SGF system certifies fruit-processing companies, packers and bottlers, traders and brokers for fruit juices, as well as transport companies and cold stores in almost 60 countries worldwide. In addition to food safety, SGF certification covers product quality and corporate social responsibility principles.
**Tips:**

- EU market entry preparation is more likely to include implementing a food safety management system than not, and it is therefore important to familiarise yourself with them. As a first step you may consider to implement a general HACCP system, to later complement this with one of the more specific systems of the GFSI family mentioned above.
- When you plan to target one or more markets, check which specific food safety management systems are most commonly requested. In any case choose for a management system that is GFSI approved. When you decide on GFSI certification scheme carefully check available consultants and certification bodies in your country and with your buyers. In practice, some certification bodies may not be accepted by EU buyers who are not familiar with them.
- Read more on the different Food Safety Management Systems at the ITC Standards Map (see also the Box below).
- Please note that some big companies make use of electronic qualification systems, in which you register in a supplier qualification system.

**Social Corporate responsibility**

EU buyers (especially large ones in western and northern EU countries) pay more and more attention to their corporate responsibilities regarding the social and environmental impact of their business. This also affects you as a supplier. Common requirements are the signing of a suppliers’ code of conduct in which you declare that you do your business in a responsible way, meaning that you (and your suppliers) respect local environmental and labour laws, stay away from corruption etc. Furthermore importers may also participate in initiatives such as the Ethical Trading Initiative (ETI) in the UK. These initiatives focus on improving social conditions in their members’ supply chains. This implies that you, as a supplier, are also required to act in compliance with their principles.

Electronic interaction between buyer and vendors is becoming more common. This means that you might be asked to deliver all the information digitally.

In the fruit juice industry The Fruit Juice CSR Platform was set up in 2013 as a sustainability initiative specifically established for the fruit juice industry. The main aim of the platform is to ensure that all fruit juice production is done in a socially responsible way and this initiative is spreading to sourcing of raw materials from Developing Countries. The European Fruit Juice Association is currently developing a CSR initiative especially focused on production of concentrated orange juice in Brazil as Brazil represents 80% of the world production. Experts expect this initiative to further include the production of apple juice concentrate.

**Tips:**

- In case you are targeting the UK market familiarise yourself with the ETI base code to check what ETI members require from their suppliers.
- When targeting other EU markets it might be interesting to assess your company’s current performance by doing a self-assessment, which you can find on the BSCI website.
- Be aware that many of the environmental and social sustainability issues take place at farm level. To test to what extent your farmers are sustainable you could ask them to fill in the Farmer Self-Assessment by the Sustainable Agriculture Initiative.
- Big company’s such as Unilever have developed sustainable agricultural code which covers practices for suppliers.
- Consider defining and implementing your own code of conduct. This is not required by buyers, but may be a good way to show potential buyers your views on corporate responsibility. Refer to the code of practice of the Fruit Juice Association (AIJN) for inspiration. The AIJN represents a large share of the European fruit juice producers.
- Implementing a management system such as ISO14001 (environmental aspects), OHSAS 18001 (occupational health and safety), ISO 26000 (a comprehensive system including all social responsibility aspects) or SA 8000 (labour and working conditions) is a good way to address sustainability and possibly gain a competitive advantage. Research with your buyer whether this is appreciated.
- Invest in building a good relationship with your buyer, invite them at the production location, and go into dialogue, to build trust and a long term relationship.

**ITC’s Standards Map**

Check the International Trade Centre's Standards Map, an online tool which provides comprehensive information on more than 210 voluntary sustainability standards and other similar initiatives covering issues such as food quality and safety. In Standards Map you can identify standards or codes of conduct relevant to your product, review the main features of the selected standards and codes and compare standards’ requirements side-by-side. Furthermore you can assess your company’s performance against standards requirements in a self-assessment module, and generate your own company’s
"sustainability diagnostic report" which you can then share with the business community. Check the Standards Map videos to see how Standards Map can help you to determine which initiatives may be useful for your company.

Niche requirements: a growing market for certified products

Fairtrade Certification

Fair-trade products are produced with additional attention to social conditions in the producing areas. The leading standard from Fair Trade International is available for dried fruits and vegetables, fruit juices and nuts. This standard is primarily concerned with the living conditions of disadvantaged producers in developing countries, particularly small farmers and plantation or farm workers. After certification, which is conducted by Flocert, you will be allowed to display the Fair Trade consumer logo on your products. In general, premium prices are paid for fair-trade products. Although the market for processed fruits and vegetables and edible nuts with Fair Trade certification is growing, it remains a niche market.

Tip:
- Consult the Fair Trade Standards for small producer organisations for edible nuts and prepared and preserved fruits and vegetables.

Organic, niche market

Organic processed fruit and vegetables and edible nuts are produced and processed by natural techniques (e.g. crops rotation, biological crop protection, green manure, compost). Although the organic market has been growing rapidly in developed countries for more than a decade (reaching shares of 5%-10% in countries like Denmark, Sweden and Switzerland), it continues to be regarded as a niche market. To market processed fruit and vegetables and edible nuts in the EU as organic, they must be grown using organic production methods which are laid down in EU legislation and growing and processing facilities must be audited by an accredited certifier, before you may put the EU organic logo on your products, as well as the logo of the standard holder (e.g. Soil Association in the UK, Naturland in Germany). European Union authorities can require increased control of organic products imported from non-member states.

Tips:
- Implementing organic production and becoming certified can be expensive. In the current market, the return on investment may not be high. On the other hand, it can increase yields and improve quality.
- Check the Guidelines on imports or organic products into the European Union to get an idea of the requirements for European traders.
- Consult the Standards Map database for organic labels and standards and other voluntary private standards.
- Consult the Guidelines on additional official controls for imported organic products. In 2016, additional controls have been suggested for organic products imported from Ukraine, Azerbaijan, Belarus, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Tajikistan, Uzbekistan and the Russian Federation.

Rainforest Alliance

The Rainforest Alliance (RA) standard is a mainstream sustainability scheme with a main focus on environmental issues. Rainforest Alliance only certifies tropical products such as tropical fruits including bananas, pineapple, mango, avocado, guava and citrus and different kinds of nuts. Rainforest Alliance is growing fast in the fresh fruit vegetables market. RA is not very big yet in the market for processed fruit and vegetables and edible nuts, except for the market of fruit juices (e.g. the brand Innocent).

Tips:
- Implementing organic production and becoming certified can be expensive. In the current market, the return on investment may not be high. On the other hand, it can increase yields and improve quality.
- Consult the Standards Map database for voluntary private standards.

Ethnic niche-market certification

The Islamic dietary laws (halal) and the Jewish dietary laws (kosher) impose specific restrictions in diets. Exporters of PFV from developing countries who wish to focus on Jewish or Islamic ethnic niche markets should consider implementing halal or kosher certification schemes.
Tip:
- If you are focusing your exports of PFV on the Jewish or Islamic market within the EU, you should become familiar with certification procedures. Answers to many questions are available from halal or kosher organisations (e.g. the certification agency OU Kosher or the Halal Food Council of Europe).