



CBI
Ministry of Foreign Affairs

CBI Product Factsheet:

Fresh Herbs in Germany

Introduction

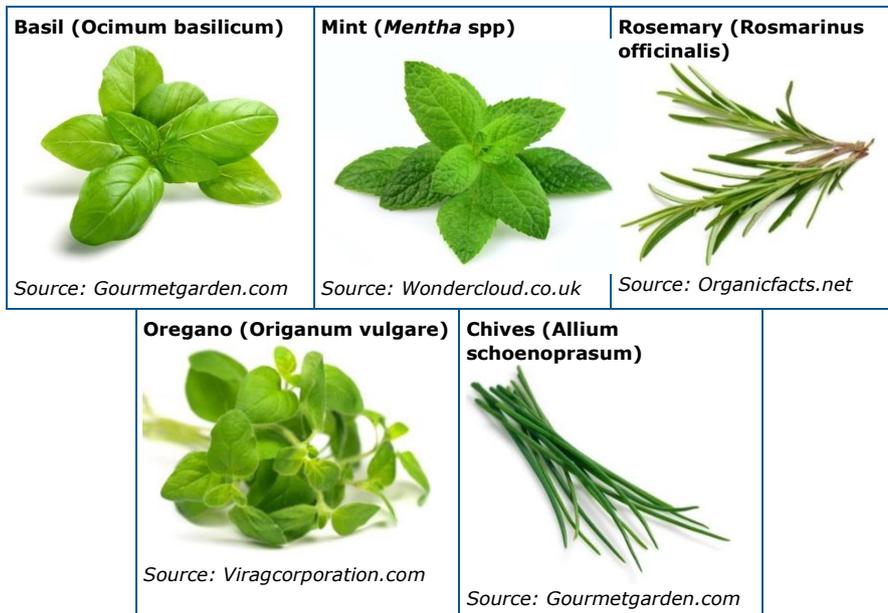
Inspired by TV chefs, health-conscious German consumers are increasingly choosing fresh herbs to spice up their dishes. An interest in Mediterranean cooking and fresh herbal teas is opening up the market for basil, rosemary, oregano and mint, while chives have long been popular in German cuisine.

Product description

In addition to providing information on the German market for fresh herbs in general, this factsheet focuses on 5 specific herbs (see overview below):

1. Basil (*Ocimum basilicum*)
2. Mint (*Mentha* spp)
3. Rosemary (*Rosmarinus officinalis*)
4. Oregano (*Origanum vulgare*)
5. Chives (*Allium schoenoprasum*)

Figure 1: Fresh herbs covered in this factsheet



Ocimum basilicum, commonly known as **basil** or sweet basil, is native to certain parts of Asia and Africa. *Ocimum basilicum* is an aromatic, annual herb, approximately 0.3-0.5 metres tall, but some cultivars can grow up to 1 m. In Germany, Basil is mostly used to flavour Italian and Thai dishes and it is the main ingredient of pesto sauce.

Mentha, also known as **mint**, is a genus of the family Lamiaceae (mint family). The plant, which consists of many different species, is native to Europe, Asia, Africa, Australia and North America. The most common and popular mints are peppermint (*Mentha × piperita*) and spearmint (*Mentha spicata*). As the taste of peppermint is considered strong for most culinary uses, spearmint is most often used for flavouring due to its relatively mild taste.

Rosmarinus officinalis, commonly known as **rosemary**, is a herb that is native to various countries in the Mediterranean, such as Tunisia, Turkey, France, Spain and Morocco. In Morocco and Tunisia, the plant is wild harvested. In addition to the use of rosemary as a herb in dried or fresh form for culinary purposes, it is also used as a decorative plant in gardens, where it may help control pests.

Origanum vulgare is the scientific name of **oregano**, which is a common species of *Origanum*, a genus of the family Lamiaceae. Native to warm-temperate western and southwestern Eurasia and the Mediterranean region, it is widely used in Greek and Italian cuisine for the flavour of its leaves, which can become more flavourful when dried than fresh. Together with basil (*Ocimum basilicum*), it is one of the main flavouring ingredients of Italian food.

Allium schoenoprasum, commonly known as **chives**, is used as a culinary herb to impart a mild onion flavour to many foods, including salads, soups, vegetables and sauces. The plant is widespread across much of Europe, Asia and North America. Chives can be found fresh at most markets all year round, making them readily available for German consumers.

No known specific harmonised system (HS) codes have been assigned to the fresh herbs covered in this document. Fresh herbs are included in HS codes for fresh vegetables: 0709 'other vegetables, fresh or chilled'.

Product specifications

Quality

General requirements

The quality requirements for fresh herbs are covered by marketing standards for fresh fruits and vegetables in the European Union, including Germany. These are defined under the [Marketing Standards for Fruit & Vegetables](#) according to [Commission Implementing Regulation \(EU\) No. 543/2011](#). This General Marketing Standard (GMS) applies to fresh herbs. It covers the following:

1. Minimum quality requirements

Subject to the tolerances allowed, the products must be:

- intact
- sound; products affected by rotting or deterioration such as to make them unfit for consumption are excluded
- clean, practically free of any visible foreign matter
- practically free from pests
- practically free from damage caused by pests
- free of abnormal external moisture
- free of any foreign smell and/or taste.

The condition of the products must be such as to enable them:

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

2. Minimum maturity requirements

The products must be sufficiently developed, but not overripe.

The development and state of maturity of the products must be such as to enable them to continue ripening and thus to grow to a satisfactory degree of ripeness.

3. Tolerance

A tolerance of 10% by number or weight of the product that does not satisfy the minimum quality requirements is permitted in each lot. Within this tolerance, not more than 2% may consist of produce affected by decay.

4. Marking the origin of produce (full name of the country of origin)

For products originating in a Member State [of the European Union], this must be in the language of the country of origin or another language that is understandable for the consumers of the country of destination. For other products, this may be in any language understandable by the consumers of the country of destination. If you package products for the consumer market, you will need a label in German. However, if you work with suppliers or retailers, the buyer usually provides the labels. For more information, please refer to the section on [Labelling](#) below.

Product-specific requirements

Those who wish to sell fresh fruits and vegetables without a specific marketing standard should follow the guidelines of the [UNECE Standards for Fresh Fruit and Vegetables](#). However, these do not list product-specific requirements for fresh herbs. This is why quality standards are based on alternative sources, such as the [Codex Alimentarius](#). Here, fresh herbs are covered in standards on fresh fruits and vegetables, such as Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003, available at the [List of Standards](#)).

Since no organisational quality reference is available at the international level, retailers usually define their own standards, normally in close cooperation with the supplier. An important principle when developing and applying standards at the retailers' level is consistency. For an example have a look at an [UNECE document on the Quality Inspection of Fresh Herbs for Export from Israel](#). Although this is not a specific requirement, it can give you an indication which aspects are important in terms of the quality of fresh herbs.

Labelling

General requirements

The labelling requirements for fresh herbs in Germany follow the general European Union requirements for fresh vegetables. These requirements are described under the [Marketing Standards for Fruit & Vegetables](#) according to [Commission Implementing Regulation \(EU\) No. 543/2011](#).

All fresh vegetables subject to European Union's marketing standards must be labelled with:

- nature of produce
- country of origin
- standard/class
- variety (if included in the standard).

If the produce is sold **pre-packaged**, the following additional information must be stated on the product label:

- name and address of packer
- weight or number of items in the package
- lot number
- size (if stated so in the standard).

If the product is sold in retail packaging, all information above will have to be in **German**. In addition, any certification logo, or retailer's logo – in the case of private label products – should be displayed on the label.

Organic: In order for fresh herbs to be marketed as certified organic in Germany and more generally in the European Union, they must contain the European Union's organic logo. In order to include the organic logo, the product must comply with European Union regulations for organic farming and marketing. Read more about the EU organic logo [here](#). The regulation is explained more extensively on the section "[What are the niche requirements?](#)" of this document. In addition to the European Union logo, Germany has its own organic logo, the Biosiegel. This logo is less commonly used than the European organic logo, but it may be required by some retailers. Discuss these options with your buyers.

Packaging and transport

Harvested fresh herbs which are perishable need to be packaged and transported in such a way that maintains the integrity of the herbs. Producers need to minimise the time between harvesting and packaging to ensure maximum freshness and quality.

The *Codex Alimentarius* [Code of Hygienic Practice for Fresh Fruits and Vegetables](#) includes an Annex on fresh leafy vegetables, which includes fresh herbs (Annex III). This Annex provides more information on the storage, packaging and transport of such herbs. Moreover, the *Codex Alimentarius* [Code of Practice for Packaging and Transport of Fresh Fruit and Vegetables](#) contains several recommendations for maintaining the quality of produce during transportation.

Product-specific requirements

Fresh herbs need to be cooled during transportation ([UCDavis Postharvest Technology](#)). The optimum temperature is usually around 0°C, but this depends on the species. Of those covered in this study, basil is frost-sensitive and should be kept at higher temperatures to prevent deterioration (around 10°C).

Bulk packaging

Packaging of fresh herbs often depends on the customer's requirements. Herbs are usually packed in Styrofoam boxes or waxed cartons, covered with plastic, in 1-3 kg portions. Growers can also choose to pack herbs in perforated polyethylene or poly propylene bags inside waxed cartons. Packaging in plastic bags or films is mainly done to reduce water loss.

Herbs should not be packed in wooden containers, because the potential for contamination is too high and the containers are difficult to clean.

Retail packaging

Common retail packaging in supermarkets includes plastic bags or packs, usually weighing 15, 30 or 40 grams.

How large is demand for fresh herbs in Germany?

Imports

German consumers are price-sensitive in their purchases of fruits and vegetables, but their country is still Europe's largest importer ([FreshPlaza, 2014](#)). The main suppliers of fresh vegetables (including but not limited to fresh herbs) to Germany include Mediterranean EU countries (Italy, France and Spain) and the Netherlands ([ITC Trademap](#)). Of these, the Mediterranean countries are the main European producers of fresh vegetables and herbs, while the Netherlands is an important trader.

In general, demand for fresh herbs is rising in Europe, including in Germany. There are several European suppliers of these herbs, such as those in Italy and Spain. Moreover, Germany produces a considerable volume of herbs as well, both for the fresh market and for dried applications (e.g. in health products).

Product-specific

Germany's main suppliers of basil, rosemary and oregano are from Mediterranean countries, both in and outside of Europe. These include Spain, Italy, Morocco, Tunisia, Egypt, Turkey and Israel. Although cultivation of these herbs may be more productive in Mediterranean climates, the fresh herbs covered in this study can be produced in a wide range of countries.

To illustrate this point, suppliers to Europe and Germany also include African countries such as Kenya and Ethiopia, Asian countries such as Vietnam and Thailand, and South American countries such as Colombia. The latter country produces several fresh herbs, such as basil, chives and mint ([FreshPlaza, 2015](#)). In Colombia, production is stable all year round and exports increase during the winter off-season in the Northern Hemisphere. Exports from suppliers in Africa, Asia and South America are mainly transported by air freight.

Tips:

- If you can produce fresh herbs during the Northern Hemisphere's off-season, target the European market and, in particular, the German market. Ensure that you are able to deliver these products fresh, which requires logistic and planning skills. For more information, refer to the [Competition](#) section of this factsheet.
- Include in your marketing materials which different fresh herbs you can export at the same time. Buyers often buy a range of herbs from the same suppliers.
- Be aware that you can expect competition from a wide range of suppliers, in the Mediterranean, Africa, Asia and South America.
- Have a look at the [CBI Product Factsheet on Culinary Dried herbs](#). Although this factsheet focuses on dried herbs, it also includes relevant information on production and potential competitors of various herbs.

German production

Suppliers of herbs find both competition and additional opportunities in the wide range of applications for herbs. The main 'window' for suppliers of fresh herbs lies outside the German production season (see [Competition](#)).

Herbs have various uses: they can be used as fresh culinary herbs, but are also often dried and further processed for animal feed, health and cosmetic applications such as herbal medicinal products, food supplements, cosmetics and aromatherapy. Not all of the herbs covered in this study are used in all forms. Chives, for example, are mostly used for culinary purposes, whereas mint and rosemary have strong applications in medicinal tea, herbal medicine and aromatherapy.

You may meet strong competition from production in Germany during the growing season. The cultivation of herbs and other medicinal and aromatic plants (MAPs) has a long tradition in Germany, particularly in the east of the country. Other production areas include Bavaria, Hesse and Lower Saxony. Around 75 species of MAPs are grown commercially in Germany on acreage of 13,000 ha ([IVA, 2014](#)). The German government aims to expand the area under cultivation to 20,000 ha by 2020.

Product-specific

The most important culinary herbs produced in Germany are parsley, **chives**, marjoram, dill, chervil, **sweet basil**, celery, mustard, coriander and caraway. The main medicinal herbs produced in Germany are chamomile, **mint**, thyme, lemon balm, St. John's wort, purple coneflowers, valerian, narrow leaf plantain, sage, milk thistle and sea buckthorn ([Europam](#)).

German production of both potted and cut fresh herbs is highest for basil (38% of production in 2010), parsley (21%) and chives (15%) ([University of Bonn, 2014](#)). In 2013, Germany produced around 12,000 tonnes of chives ([BMEL, 2014](#)).

German production of fresh herbs usually slows down in the winter months, when the gap in supply is picked up by Italian and African/Middle Eastern producers (e.g. from North Africa, Kenya and Israel) ([Freshplaza, 2015](#)). This creates opportunities for you to supply the German market.

Tips:

- If you can produce fresh herbs in Germany's off-season, you can benefit from the gap in local production in Germany, especially when you produce varieties that are grown (and popular) in Germany (e.g. chives, basil and mint).
- Be aware that you will face competition from growers in countries such as Kenya, Ethiopia and Israel, who already supply fresh herbs to Germany and other European countries.
- For opportunities in different applications for herbs, please refer to CBI Product Factsheets and Modules on [dried herbs and spices](#), [natural ingredients for health products](#) and [natural ingredients for cosmetics](#).

German consumption of fresh herbs continues to grow

About one third of herbs consumed in Germany are produced domestically ([Gemüse Serviceportal](#)). In 2013, German households spent 13% more on fresh herbs than in the previous year ([FreshPlaza, 2014](#)). This growth was the result of both an increase in the volume purchased as well as slight increases in the price of herbs. A growing German market for fresh herbs represents opportunities for new suppliers.

Fresh herbs are among the top 10 of fresh vegetables in German consumer spending ([AMI, 2014](#)). In 2013, German households spent an average of €4.25 on fresh herbs. In total, German households spent around €150 million on herbs, of which €31 million are spent on basil, the most popular herb in the country ([IVA, 2014](#)).

Product-specific

Growing consumption of the fresh herbs in this study indicate that the German market creates opportunities. From 2004 to 2013, sales of **basil** were among the fastest growing types of herbs and vegetables. In this timeframe, consumption by German households increased by 3% annually, only topped by fennel (+ 3.4% annually). Basil is one of the most popular herbs in Germany – after parsley – followed by **chives** and dill ([Fruchthandel, 2013](#)).

In the German herbal tea market, fresh **peppermint** tea is the most popular mono-herbal tea. Although mint is mostly supplied dried for this market, it does reflect the interest of consumers in the herb. Moreover, consumers also use fresh mint to make mint tea. Of the total herbal tea market in Germany, mint tea accounted for 14.8% (around 5,600 tonnes) of total sales in 2014 ([WKF, 2015](#)).

Sales of **potted herbs** are also rising steadily in Germany as well. From 2005 to 2012, sales almost doubled, reaching €50.3 million in 2012 ([University of Bonn, 2014](#)). Again, basil is the most popular herb in this market (50% market share), followed by chives ([Aid, 2015](#)). Most popular fresh herbs sold in bunches are parsley, chives and dill.

Which trends offer opportunities for fresh herbs on the German market?

In Germany, as in other European countries, **home cooking** is increasingly popular. In 2013, 65% of German consumers cooked at home to **save money** ([Allrecipes](#)), although there are many other drivers for this trend. Main drivers are described below: convenience, healthier living and "clean eating".

Moreover, consumer interest is growing to cook like the professional chefs they see on TV. German companies such as [Hello Fresh](#) and [Marley Spoon](#) have responded to this trend by delivering fresh ingredients, including recipes, to consumers' doorsteps. Sales by these companies are growing rapidly ([LMK, 2015](#)). Fresh herbs are an important ingredient in these meals.

Convenience in eating is still an important trend in Germany, as time-pressed consumers do not have the time to make a home-cooked meal. Convenience products include frozen or chilled ready meals or on-the-go breakfasts ([Frozen Food Europe, Mintel](#)).

For herbs in particular convenience can take several forms, which can offer opportunities for suppliers who can provide these different forms. The most common form of convenience products are herb mixtures, although these are mostly limited to dried or frozen herbs. Convenience in fresh herbs focuses on ease of use and increasing shelf life, for example with [frozen herbs](#) or fresh herb pastes. In Germany, the popularity of frozen herbs has increased consumption to around a third of the expenditure on fresh herbs ([Gemüse Serviceportal](#)). [Fresh herb pastes](#) keep fresh for several weeks while having the same look, taste and aroma as fresh herbs.

Tip:

- If you want to supply pre-cut fresh herbs to the German market, be aware that these products may need to follow additional microbiological criteria. See the [Buyer Requirements](#) section for more information.

However, the trend towards **healthier living** is changing the demand for convenience and ready meals ([Agriculture and Agri-Food Canada, 2012](#)). The German population is ageing; in 2015 the country will have the highest mean age in Europe. This ageing population is expected to focus more strongly on healthy food, which is good for products with a healthy image ([Euromonitor, 2015](#)). There are increased opportunities for certified organic foods and healthy foodservice meals. Although the total volume is likely to remain stable in the years ahead, an increase in spending on fresh food will lead to higher consumption in value terms. This also indicates a growing potential for fresh herbs: since fresh herbs are seen as healthy ingredients, their sales are expected to increase as well ([Krueger](#)).

Tip:

- Ensure freshness of your herbs by using correct transportation and packaging. For more information see the [Product Specifications](#).

In addition, the growing trend for healthy (home) cooking is driven by a trend for “**clean eating**”: eating foods free from additives ([Deutschlandfunk.de](#)). Consumers increasingly see processed ingredients and additives as unhealthy additions to their foods and prefer pure, natural food products. Fresh herbs fit this trend very well, especially as they are seen as healthy ingredients with a natural flavour ([Krueger](#)). Fresh herbs can also reduce the intake of salt, which is another goal of healthy cooking. Related to this trend is the increased consumer concern about **food safety**; ensuring safe herbs which follow European legislation is key.

Tips:

- To stress the safety aspect of your fresh herbs, make sure that they comply with food safety legislation. Make sure you browse through various border rejections and alerts for specific fresh herbs under the product category 'herbs and spices' after accessing the [RASFF Portal](#). In this manner, you can learn about common problems faced by suppliers during border controls and adopt appropriate measures to avoid them.
- Develop an Identity Preservation (IP) system for your products (i.e. maintaining their segregation and documenting their identity), focusing on their origin and on transparency along the chain.
- In the [RASFF Portal](#), it is possible to trace all cases of notifications and border rejections in Germany and in the European Union, mostly based on contamination.

Not only is home cooking making a comeback; the type of food that German consumers make is changing as well, which increases the market potential for the herbs in this study. Italian and other Mediterranean cuisines are becoming increasingly popular among German consumers ([FreshPlaza, 2015](#)). **Basil** and **oregano** are traditional herbs in these cuisines. The increase in these cooking styles is leading to a growing popularity of these fresh herbs. Moreover, Southern EU countries traditionally have a preference for fresh herbs over dried ones, which is likely to be reflected in the recipes for these cuisines ([CBI, 2015](#)). The increased popularity of fresh herbs in Germany extends to other herbs as well, such as **mint**, **rosemary**, sage and thyme.

Tip:

- Differentiate your fresh herbs on the market by adding recipes that use these herbs as ingredients.

Consumers' increased need for “clean eating”, traceability, sustainability and local sourcing has also led to another trend: **home gardening**. Consumers are keen on growing their own herbs and vegetables, which can be a source of competition or an additional opportunity if you can supply potted herbs. Herbs fit particularly well with this trend. They only take up a small part of a garden, home or balcony. Moreover, when grown indoors, potted herbs give consumers good access to fresh herbs all year long, whenever they want to add it to their food. As a result, the interest in potted plants is likely to expand in the future, especially for popular plants such as **basil**, **mint**, **chives** and parsley ([FreshPlaza, 2013](#)). Additionally, **rosemary** and **oregano** are marketed for gardening on balconies, since these perennial herbs grow best in sunny places ([Krueger](#)). **Potted herbs** are still mostly supplied by European growers and form a source of competition for your supply of fresh herbs.

Tip:

- Find out if you are able to supply potted herbs to the German market. Be aware that this market has different requirements than for fresh cut herbs ([FreshPlaza, 2014](#)):
 - There is an interest in compact herbs, which can easily be packaged and transported at minimal damage to the plant itself.
 - Potted herbs with a short spacing of leaves are popular as well, as these are easier to manage and harvest.

The growing demand for sustainability has an impact on consumption of fresh herbs. More specifically, German consumers are interested in **local sourcing** of fresh products, to reduce emissions from transportation. This trend can be a disadvantage for developing country suppliers located further away. Moreover, retailers highlight the local source of fresh produce to highlight the freshness and environmental sustainability ([Euromonitor, 2014](#)). However, buying local in Germany does not necessarily refer to produce grown in Germany, but rather to those from a designated origin, or even specific territory/region ([Agriculture and Agri-Food](#)). Around 75% of German consumers do prefer to buy regional products. But, at the same time consumers also want an all-year-round supply of fresh herbs. This is why this threat is strongest during the European production season.

Tip:

- Employ social and environmental sustainability practices in the production of your fresh herbs. Show evidence of this in your marketing materials. Examples include reduction of water and energy used in production, minimising energy emissions in transportation or certifying your fresh herbs (see next paragraph on organic certification).

The interest in and supply of **organic** fresh herbs and other vegetables is growing ([Fruit Logistica](#)), offering opportunities on the German market. The strongest growth of organic foods is in the fresh produce segment ([Boelw](#)). Consumer food safety concerns, in particular over pesticide residues, is driving the interest in organic fresh foods, such as herbs, to ensure food safety. The organic market in Germany is the largest in Europe. From 2013 to 2014, this market grew by 4.8%, reaching a market size of €7.9 billion, which represents 3.8-4.0% of the total food market ([AMI, 2015](#)).

Tips:

- In order to market a product as "organic" in Germany (or in any other country in the European Union), this product must comply with the [EU Regulation](#) (Council Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008 (OJ L-250 18/09/2008) for organic production and labelling. Claims of "Natural", "Pesticide free" or "Organic by default" are not valid without organic certification.
- Learn more about the requirements for organic certification and refer to other *Tips* under the "[What are the requirements for niche markets?](#)" section.

Which requirements should fresh herbs comply with to gain access to the European market?

Marketing standards in the European Union

The quality requirements for fresh produce in general, and fresh herbs in particular, are described under the 'Product specifications> Quality> [General requirements](#) / [Product-specific requirements](#)' sections of this document.

Food safety: Traceability, hygiene and control

Food safety is a key issue in EU food legislation. All food products in the European Union, including fresh herbs, must comply with the General Food Law ([Regulation \(EC\) 178/2002](#)), laying down the general principles and requirements of food legislation, establishing the [European Food Safety Authority](#) and laying down procedures in matters of food safety. It also includes provisions on the traceability of food; the ability to track food products through the stages of production. For exporters to the EU, your buyers (minimally) expect you to know and document your buyers and suppliers and which products are used during your production process, and to label final products for traceability in case of a food safety problem.

Control of food imported to the EU

In the event of repeated non-compliance of specific products originating from particular countries, such products 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 put on a list included in the Annex of [Regulation](#)

[\(EC\) 669/2009](#). Regarding fresh herbs have a look at relevant cases to find out for which specific non-compliance hazards products from your country receive extra strict checks. For example:

- Mint (Food – fresh or chilled herb) [CN code ex121190 86]. Origin: Morocco. Hazard: Pesticide residues analysed with multi-residue methods based on GC-MS and LC-MS or with single residue methods. Frequency of physical and identity checks: 10%.
- Basil (holy, sweet) [CN code ex121190 86]. Origin: Thailand. Hazard: Salmonella. Frequency of physical and identity checks: 10%.

Tips:

- Read more about sanitary and phytosanitary requirements at the [EU Export Helpdesk](#) and pay special attention to the following European Commission documents:
 - [Import requirements and the new rules on food hygiene and official food controls](#)
 - [Implementation of certain provisions of Regulation \(EC\) No 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs](#)
- Check if there are any increased levels of controls for your product and country. The list is updated regularly. Check the [Regulation](#) periodically for the most recent list.

Plant Health

Fruit and vegetables exported to European Union must comply with 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 of Annex V of [Directive 2000/29/EC](#) must be accompanied by a plant health certificate. Of the five herbs discussed in this factsheet, you need a plant health certificate for **basil**. **Chives** are also listed in this Annex, but you only need a plant health certificate when you export this plant and/or seeds intended for planting. If you want to check other herbs not included in this factsheet, make sure you search by using the **Botanical name** of your product.

Tips:

- Check with the relevant [Plant Protection Organisation \(NPPO\) in Germany](#) or with your importer what the requirements are applying to your product. This is particularly important if you export basil.
- If a phytosanitary certificate is needed to be allowed entry into Germany / the EU, refer to the model phytosanitary certificate on Annex VII (p.170) of [Directive 2000/29/EC](#) and/or ask your importer for assistance.
- Read more about plant health on the website of the [European Commission: Plant Health](#).
- The European Union's legislation on plant health has been subjected to recent modifications. The final decision on such changes, which affect issues such as impact assessment, stakeholder consultations and evaluation will take several years, but the website of [European Commission: Plant Health: New EU Plant Rules](#) contains useful information which will help you plan ahead.

Maximum Residue Levels (MRLs)

The European Union has set MRLs for pesticides in and on food products, which is particularly relevant for fresh herbs. Products containing more pesticides than allowed will be withdrawn from the EU market.

Note that Germany, together with the UK, uses MRLs which are stricter than the MRLs laid down in EU legislation. In fact, Germany applies the strictest MRLs at the retail level in Europe! As a general rule, German retailers apply an MRL rule which is three times stricter than the EU legislation – but some German retail chains can set the MRL limit even higher.

Tips:

- Find out which MRLs are relevant for your products and 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.
- Consult your German buyer on their specific MRL requirements and on their expectations for compliance. As mentioned above, company policies might limit the MRLs to 30%, 50%, 70% or even higher parameters in relation to the EU legislation.

Contamination sources and maximum levels

Contaminants are substances that may be present as a result of impurities and pollutants affecting fresh herbs during the various stages of pre-harvest, harvest or post-harvest (including packaging). One of the most common problems faced by exporters of fresh herbs and other fresh produce is contamination derived from external sources. For this reason, it is crucial for exporters to learn about and comply with the maximum contamination levels allowed by the European legislation. The different sources of contamination in fresh herbs, and the respective legislation addressing them, are:

- **Heavy metals** (see section 3 of Annex of [Regulation \(EC\) No 1881/2006](#)):
 - The maximum limit of **cadmium** allowed for fresh herbs and other leaf vegetables is 0.20 mg/kg wet weight.
- **Microbiological:** In the current [EU legislation \(Commission Regulation \(EC\) No 2073/2005\)](#), microbiological criteria have been set specifically for fresh vegetables. Although there is no specific legislation for microbiological contamination for fresh herbs, food safety authorities can withdraw imported fresh herbs from the market or prevent them from entering the EU when *Salmonella*, *E. coli* or other microbes are found. Criteria for fresh pre-cut vegetables (ready-to-eat) are:
- **Salmonella** – Absence in 25 g (Analytical reference method: EN/ISO 6579).
 - **E. coli** – Limit value m of 100 cfu/g; limit value M of 1,000 cfu/g (Analytical reference method: ISO 16649-1 or 2).
- **Foreign matter:** Contamination by foreign matter such as excessive filth, soil or other materials is a threat for the quality of fresh herbs.

General requirements on packaging and liability

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

Full overview of requirements for fresh vegetables, including fresh herbs:

For a list of requirements consult the [EU Export Helpdesk](#) where you can select your specific product code under Chapter 07 (Edible vegetables and certain tubers); you can select your respective origin and export destination (e.g. Germany).

Which additional requirements do buyers have?

GLOBALG.A.P., QS and other quality management standards

The most often requested food safety certification scheme, essential for exporting fresh herbs and other produce to the European Union, and Germany in particular, is [GLOBALG.A.P.](#). Even though GLOBALG.A.P. is not a legislative requirement per se, it is requested by practically all retailers in the European Union.

GLOBALG.A.P. is a pre-farm-gate standard which covers the whole agricultural production process from farm inputs such as seedling until the product leaves the farm, i.e. only primary in-field processing is covered. So as to cover further steps in the value chain, GLOBALG.A.P. is often supplemented by quality management systems which relate to post-harvest handling, packaging and other processes outside of the farm.

Implementing a Quality Management System according to HACCP is a minimum requirement regarding handling and processing steps in the value chain. This system is thus additional to GLOBALG.A.P., which only covers processing steps until products leave the farm. HACCP is specified in both the *Codex Alimentarius* standard on [General principles of Food Hygiene](#) and mentioned under General Food Law [Regulation \(EC\) 178/2002](#). Social practices are increasingly part of the agenda of German retailers and their audit processes. This is why German retailers will most probably ask for additional Quality Management System certificates such as [International Featured Standards \(IFS\): Food](#), which is a quality and safety standard published by the union of German supermarket chains, [HDE \(Hauptverband des Deutschen Einzelhandels\)](#).

An alternative requirement often used by German retailers is the [GLOBALG.A.P.-equivalent](#) standard [QS](#). While QS is equivalent to GLOBALG.A.P. at the farm level (QS-GAP), it also covers further food safety steps along the value chain, from the farm gate to wholesalers and retailers. As such, QS is a 3-tier system which involves every stakeholder in the value chain. A combined certification for both QS and GLOBALG.A.P. at the same time is possible at the producer level. Apart from QS you will also need a specific HACCP based system for quality management, such as IFS.

Tips:

- Refer to the European Commission's document on the [Implementation of procedures based on the HACCP principles](#).
- If 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](#).
- Read more on the different Food Safety Management Systems at the [Standards Map](#).
- Contact your buyers to find out which (additional) requirements they have and which Quality Management System they prefer.

GRASP, a GLOBALG.A.P. / QS(GAP) add-on

[GRASP](#) stands for GLOBALG.A.P. Risk Assessment on Social Practice, and is a voluntary ready-to-use module developed to assess social practices on the farm, addressing specific aspects of workers' health, safety and welfare. Operators certified against GLOBALG.A.P. and/or QS(GAP) can get certified according to this additional module so as to substantiate their social practices at the farm level. This module is increasingly important to retailers in Germany, since it addresses social risks intrinsic to the value chain of fresh products and can strengthen their Corporate Social Responsibility (CSR) policies.

Tip:

- Read details of the quality management systems mentioned above, in addition to those relating to compulsory HACCP systems. Third-party certification of such systems can strengthen your competitiveness. Discuss these options with your buyer.

Packaging and waste avoidance

The Packaging and Waste Avoidance Law / the *Green Dot*, the German Packaging and Waste Avoidance Law ([Verordnung über die Vermeidung und Verwertung von Verpackungsabfällen, or VerpackV](#)) establishes recyclability requirements for packaging material in the framework of the European Parliament and Council [Directive 94/62/EC](#) (and amendments), on packaging and packaging waste.

The *Green Dot* (*Der Grüne Punkt*) system, which was developed to assure that product materials are recycled in a controlled facility, involves placing a symbol on the packaging material of virtually all retail products in Germany.

The use of the *Green Dot* is not a legal requirement for all products but, in practice, it will be very difficult to market a (pre-packaged) product in Germany without it. Typically, the producer or the importer pays a fee and enters into a licensing agreement with [Der Grüne Punkt - Duales System Deutschland](#), and provides the licensing company necessary product information in order to use the *Green Dot* ([GAIN REPORT, 2015](#)).

Tip:

- Read more about the [Green Dot](#) in Germany and the [EU legislation](#) on packaging and packaging waste.

What are the requirements for niche markets?

Organic

Organic certification is a non-legislative requirement for fresh herbs but, in order for a company to market its product as 'organic' in Germany and in the European market, it must comply with the [EU Regulation](#) (Council Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008 (OJ L-250 18/09/2008) for organic production and labelling – which is in itself a [legal requirement](#). Organic products must be grown using organic production methods which are laid down in legislation and growing and processing facilities must be audited by an accredited certifier, before you may put the EU and the German organic logo on your products.

One of the factors exporters have to pay special attention to is whether their organic certification is *de facto* recognised by the EU legislation. This is why producers/exporters should search for a certifier whose standards are recognised by the EU. The European Commission's [Agriculture and Rural Development](#) website provides a thorough explanation of import regulations and other related issues.

Commission Regulation (EC) No 1235/2008 of 8 December 2008 laying down detailed rules for implementation of Council Regulation (EC) No 834/2007 and its latest amendments as regards the arrangements for imports of organic products from third countries can be found on the [EUR-Lex website](#). If you want to target niche markets in Germany, you can also try to gain a competitive advantage if you comply with [Demeter](#), [Naturland](#) or [Bioland](#) organic certification criteria.

Tips

- For market information on organic certified foods, please refer to [Market Trends](#).
- Investigate the possibilities for organic certification, including the opportunities and costs involved in the process. Always discuss these options with your buyers before complying with the certification.
- For information on organic certification in Europe, visit the website of [Organic Farming](#) in the European Union, which also contains guidelines concerning imports of organic products. Also consult the [International Federation of Organic Agriculture Movements \(IFOAM\)](#) website for information on certification standards.
- Check the [Biosiegel](#) website to get acquainted with Germany's national organic label.

Fair Trade

[Fairtrade International](#) is the leading standard-setting and certification organisation for Fairtrade. In 2014, sales of German Fairtrade products amounted to €850 billion, an increase of 27% since 2013 ([Fairtrade FLO](#)). In general, herbs make up a small part of Fairtrade products, and are mostly focused on dried herbs. This is why potential in Germany for Fairtrade certified fresh herbs is deemed smaller than potential for organic certification. However, this may change in the future, as Fairtrade has now set a premium for fresh herbs specifically.

Products which carry the Fairtrade label indicate that producers are paid a [Fairtrade Minimum Price or Premium](#). Regarding fresh herbs, Fairtrade International has set a Fairtrade premium on top of the commercial price for **mint** specifically (premium of €0.50 per kg) and **fresh herbs** in general (premium of 15% of commercial price). The latter covers all five herbs included in this study. These Fairtrade premiums apply to worldwide production and both conventional and organic.

Other Fairtrade standards available in the European market are [Fair Trade Ecocert](#) and IMO's [Fair for Life](#). [Fair Trade Ecocert](#) provides for guaranteed minimum prices, producer support and good agricultural practices; this standard requires an organic certification. IMO's Fair for Life has a similar proposition, and is a standard for companies which demonstrate decent working conditions and commit to fair sourcing and responsibilities towards their primary producers. Organic certification is not compulsory for Fair for Life holders.

Tips

- Before engaging in a Fairtrade certification programme, make sure you check (in consultation with your potential buyer) that this label has sufficient demand in your target market and whether it will be cost beneficial for your product.
- Consult the [Standards Map database](#) for more information on Fairtrade and other voluntary standards relevant for fresh herbs.

What competition can I expect to face on the German fresh herb market?

Market entry

Requirements to enter the fresh produce market in Germany are (increasingly) strict, which complicate market entry.

Tips

- Comply with market access requirements on food safety, quality and traceability.
- If you want to comply with specific certifications, discuss these options with your buyers.
- For more information on German and European buyer requirements, including those on contamination and certifications, refer to the Buyer Requirements section of this factsheet.

Product competition

Substitution for fresh herbs depends on two main factors: the product and its price. For fresh herbs, the threat of substitution with other herbs/spices is limited. To illustrate this: if consumers are looking for rosemary to flavour a specific dish, they are less likely to choose other herbs because these have a different flavour.

Price is a strong factor in choosing between fresh and processed (e.g. frozen/dried) herbs. Dried herbs are most common in Germany, but fresh herbs are increasingly taking over as healthy living becomes more important among consumers.

For fresh herbs, the main substitute products include:

- Dried or frozen herbs, both as single-herb products or mixtures

- Potted fresh herbs
- Other flavouring products, such as ready-to-cook meal packages (e.g. [Knorr](#))

Company competition

Your **competitive advantage** on the fresh herbs market also depends on the geographical market, sales channel and segment. Suppliers of fresh herbs, including in Europe and Germany, are:

- For rosemary: Spain, France and Italy (Southern Europe, mostly from cultivation); Egypt, Morocco and Tunisia (mostly wild-collected).
- For basil: the Mediterranean (Italy, Egypt, and Israel), Kenya, and Ethiopia.
- For chives: Europe (including Germany), Israel, Kenya, and Ethiopia.
- For mint: Europe, Africa (e.g. Egypt and Kenya), Latin America (all year round production).
- For oregano: Mediterranean (Turkey, Italy, Spain, and North Africa) and Middle East.

In Africa, Kenya and Ethiopia are strong suppliers of fresh herbs to Germany and Europe in general ([Freshplaza, 2015](#)); in addition to other consolidated suppliers such as Egypt and Tunisia. Several of the growers in Kenya and Ethiopia are from Israel, another large supplier of fresh herbs. They moved to East Africa because of more favourable conditions than in Israel. The prices in these African countries are lower than in Israel, which makes them a preferred supplier to some European buyers. However, product quality is higher in Israel, especially in the production of basil, where African producers are currently experiencing problems.

If you can differentiate your product on the market, you can improve your competitive position. As a fresh herbs supplier, you have several options for doing this. Examples include complying with organic certification, adding recipes for your products, as well as marketing communication in general. You can also improve your competitive position if you can meet the interest of German consumers in good social and environmental practices by adding such information to your product (see Tips).

Tips

- Try to differentiate your product on the market and compete on added value, such as herbs with organic certifications, that are sustainably produced or which are ready-to-cook (pre-cut).
- Ensure freshness and quality of your products to compete with European suppliers of fresh herbs. Employ good post-harvest processes: store your products in clean containers in a clean warehouse, ensure hygienic grading and sorting conditions and apply strict sorting and grading standards. Store herbs at the right temperature. Refer to [transportation requirements](#) and the [Buyer Requirements](#) for more info. You also need logistic and planning skills to ensure that your products arrive fresh in Germany.
- Focus your exports of fresh herbs to Germany during European's off-season (see [Market Demand](#)). In those months, imports usually increase considerably as buyers seek to source year round.
- Add value to your fresh herbs by complying with organic certification, adding recipes, investing in storytelling and marketing communication, showing the consumer where and how your herbs have been produced (label, website, social media) or by compensating for the emissions during the long transportation of your fresh produce.

In general, German retailers, particularly supermarkets, have a strong position in the **supply chain**. As a result, they have very strict requirements and conditions. Moreover, competition between supermarkets is mainly on price, which makes this an issue for importers/wholesalers who supply these retailers. They will also put pressure on you to charge competitive prices.

Tips

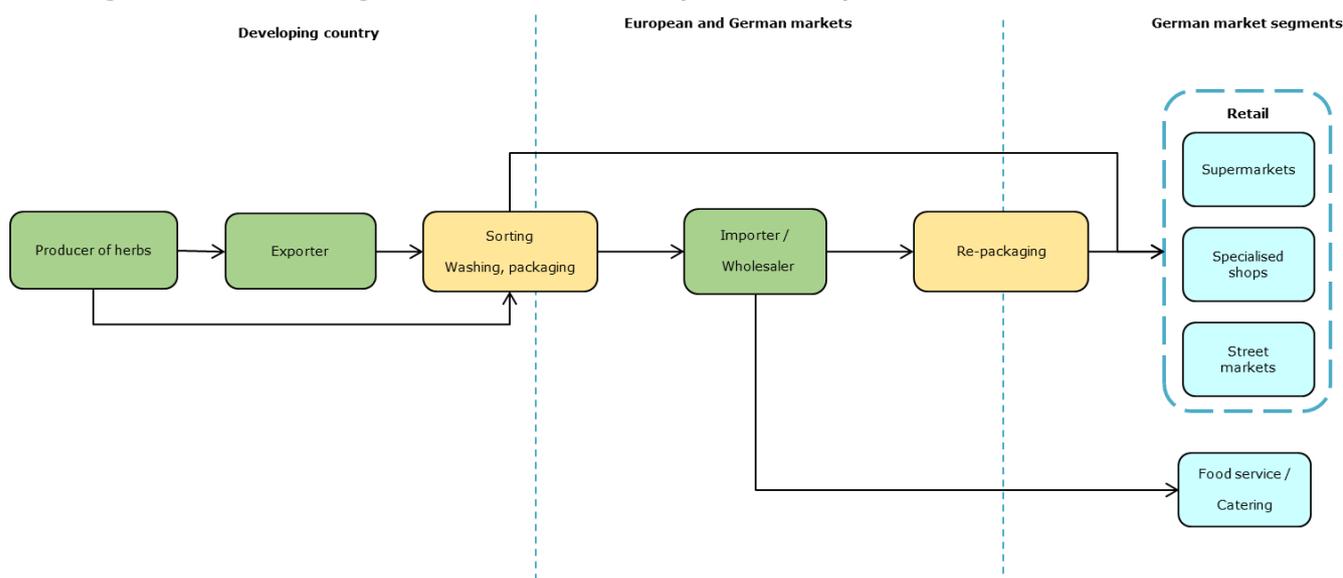
- Try to develop long-term partnerships with European buyers, for example in a long-term buying programme with a European retailer. Make sure that your company is ready for that level of commitment.
- Contact an experienced importer/distributor before you enter the German market for more information on requirements and expectations from supermarkets. Be aware that delivering to supermarkets is very demanding in terms of demanding in terms of buyer requirements and price.
- Make sure that you are a reliable and accessible partner. Adhere to agreements and make sure you are easy to contact.
- Always be available for communication. Be open and honest in your communications and promptly answer questions and requests from (potential) buyers.
- Make sure that you can trace your fresh herbs back to the farm that produced them and communicate this to your buyers. Increasing transparency helps build trust with buyers.

Which trade channels and market segments are interesting in Germany?

Market channels

The structure of the market channels for fresh herbs in Germany follows the general structure of food markets, and contains similar players, as described in CBI's [Fresh Fruit and Vegetables: Channels and Segments](#). Nonetheless, for your information, the particularities of the German market are described below.

Figure 1: Channels and segments for fresh herbs in Europe and Germany



Source: ProFound

Market channels

Production and exports

Fresh herbs are grown for exports by large-scale farmers as well as small-scale, traditional farmers and small to medium-scale contract farmers. Producers can grow herbs for the fresh and dried herbs market, as well as in order to process them into essential oils. These applications (fresh and processed) require different investments in terms of equipment and skills.

There are many "touch-points" for fresh herbs in the beginning of the supply chain, such as harvesting by hand, quality sorting, bunching and packing herbs, which are all potential sources of contamination. Producers and processors need to take measures to prevent contamination during these steps.

Growers of fresh herbs deliver their produce to exporters, which usually carry out post-harvest treatments such as sorting, cleaning or washing, trimming (and sometimes cutting), and packaging and labelling. Large-scale farmers often export fresh herbs themselves. The post-harvest steps carried out at the producing country depend on the requirements of customers further down the supply chain. Usually, **sorting and cleaning** is done in the country of origin, as well as **packaging in wholesale containers** or **retail packs**.

Exporters then sell the produce to the export markets via import agents or directly to wholesalers or supermarkets. Fresh herbs can be transported by air or sea freight, depending on the distance the produce needs to travel. In general, air freight is most common, due to the perishable nature of fresh herbs.

Imports and distribution

The most interesting trade channels for exporters of fresh herbs are importers. As described under Market Demand, fresh herbs imported into Germany are often sourced through the Netherlands. Here, the main players, facilities and logistic networks for fresh produce in Europe are located. Thus, the degree of contact between a developing country supplier and the German market will depend on whether the product is supplied directly or indirectly.

Importers purchase fresh herbs from various producing countries and resell them to domestic retailers, or re-export them to other countries. Some importers/wholesalers use agents to facilitate transactions. The **wholesale / distribution activities** might be integrated into the importer's service portfolio or outsourced to a separate company.

Importers of fresh herbs usually specialise in fresh produce such as fruits and vegetables at large (for example [Bud Holland](#) in the Netherlands, also supplying the German market). Companies that specialise in herbs and spices commonly import dried herbs, although there are some specialised Dutch importers for fresh herbs, for example [Greenfresh](#) and [Van Vuqt](#), who also export to Germany. An important German importer for fresh herbs is [Gartenbauzentrale](#), which imports herbs in Europe's off-season. Importers take care of necessary administrative formalities and often provide services such as (re-)packaging (e.g. in retail-sized packaging), transportation and logistics to then sell the produce to the retail market. These specialised wholesalers increasingly by-pass traditional importers as they handle direct import and distribution of produce.

Other important actors are wholesalers like [FrischeParadies](#), which were traditionally solely supplying to catering, restaurants, hotels but are increasingly open to end consumers as well.

Market segments

Fresh herbs are sold through two main channels:

- **Retail**, sub-divided into:
 - supermarkets
 - specialised shops
- **Food service / catering**, sub-divided into mainly:
 - restaurants
 - hotels.

Retail

For fresh herbs, supermarkets, street markets and specialised vegetable shops are the most important channels. Fresh herbs are sold in supermarkets, discounters and specialised vegetable shops. Around 90% of fresh vegetables are sold by these retail shops, with the supermarket chains Edeka, Rewe, Aldi, Lidl and Kaufland covering around 85% of the food market ([CIR, 2014](#)). These retailers have a strong competitive position (see [Competition](#)). Fresh herbs enter the German market in different forms, as potted herbs, bunches and in plastic sheets or containers, which are often used in the hospitality industry ([Aid, 2015](#)).

Moreover, special retailers/wholesalers such as [FrischeParadies](#), which were traditionally supplying to catering, restaurants, hotels, are increasingly supplying end consumers as well.

Food service

The food service industry, in which fresh herbs are used extensively, is an increasingly important player. They are used as flavouring and as garnish. The food services sector is actually one of the drivers of the use of fresh herbs at home.

What are typical market prices for fresh herbs?

Table 1: Indicative end-market prices for fresh herbs in Germany, in €per 100 gram

	High end (organic supermarkets, dennree, Alnatura, Bio Company)	Middle range (Supermarkets Edeka, Rewe, Kaufland)	Low end (Discounters Aldi, Lidl, Netto, Penny)
Basil	over €10.75	€6.60 – 10.75	under €6.00
Mint	over €7.00	€6.60	under €6.00
Rosemary	over €7.00	€5.00 – 6.60	under €5.00
Oregano	over €7.00	€6.60	under €6.00
Chives	over €4.00	€3.30 – 3.96	under €3.00

Source: Supermarktcheck, Frische Paradies

The table above contains an indication of prices for fresh herbs in German retailers. Please note that these are end-market prices for German consumers and which are much higher than export prices. Both importers and retailers add a considerable margin to FOB prices of fresh herbs.

As with most fresh produce, prices for fresh herbs will vary throughout the year, depending on European production of specific herbs. In general, prices are higher in the winter months, when European production slows down.

Useful sources

Press and associations

- European Fresh Produce Association (Freshfel) – <http://www.freshfel.org>
- Fresh Plaza - <http://www.freshplaza.com> – news and information portal covering fresh produce
- Fresh Info - <http://www.freshinfo.com> - weekly journal for the fresh fruit and vegetables business which includes industry news and market data
- German Fresh Fruit and Vegetable Association (DFHV) – www.dfhv.de
- Bundesvereinigung der Erzeugerorganisationen Obst und Gemüse e.V. (BVEO – Confederation of Producer Organisations for Fruit & Vegetables) - www.bveo.de
- Fruchthandel Online magazine – www.fruchthandel.de

German importers and wholesalers include:

- Gartenbauzentrale: www.gartenbauzentrale.de
- Univeg: www.univeg.de
- Dreesen: <http://dreesen.de/>

Relevant trade fairs

Visiting or even participating in trade fairs is highly recommended as one of the most efficient methods of testing the likely market response, obtaining market information and finding prospective business partners. The most relevant trade fairs for exporters of fresh herbs are:

- Fruit Logistica (www.fruitlogistica.de) in Berlin, Germany, is an international trade fair for fresh produce trade
- Biofach (<http://www.biofach.de>) in Nuremberg, Germany (for organic producers)

Further information

CBI market information: Promising EU export markets.

EU Expanding Exports Helpdesk - <http://exporthelp.europa.eu> - go to 'trade statistics'.

Eurostat - <http://epp.eurostat.ec.europa.eu/newxtweb> - statistical database of the EU. Several queries are possible. For trade, select 'EU27 Trade Since 1995 By CN8'.

International Trade Statistics - <http://www.trademap.org> – you have to register



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