# What requirements must herbs and spices meet to be allowed on the European market?

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You have to meet a number of requirements to enter the European market. Buyers likely have additional requirements, and they may ask for certificates. Requirements for herbs and spices in Europe are usually about consumer health and safety, but sustainability is becoming more important too. If you want to prepare for new legislation and requirements, you need to monitor the market on a regular basis.

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## 1. What are mandatory requirements for spices and herbs?

Most mandatory requirements for importing herbs and spices (and food in general) are related to food safety. The European Commission Department for Health and Food Safety is responsible for the European Union's policy and for monitoring the implementation of related laws.

### Official food controls

Food imported into the European Union (EU) is subject to official food controls. These controls include regular inspections that can be carried out at import (at the border) or later on, once the food is in the EU, such as at the importer's premises. The control is meant to check whether the products meet the legal requirements.

An important element of this legislation is that "all food businesses outside Europe, after primary production, must put in place, implement and maintain a procedure based on HACCP principles". This does not need to be guaranteed with certificates or official controls. However, it shows that an HACCP plan is a key element in the quality management systems of companies aiming to become successful suppliers to the European market.

Non-compliance with European food legislation is reported via the Rapid Alert System for Food and Feed (RASFF). In 2023, 248 issues with spices and herbs were reported in RASFF. This was a little higher than the 242 issues reported in 2022. Note that these figures include fresh spices and herbs. The most common issue was exceeding the Maximum Residue Limits (MRLs) for pesticides. This was followed by salmonella contamination, the most important bacterial contamination issue.

Source: Globally Cool (April 2024)

## Non-compliance leads to stricter conditions

If imports of a certain product from a specific country repeatedly show non-compliance with European food

legislation, the frequency of official controls at the border will increase. These products are listed in Annex 1 of the regulations on the temporary increase of official controls and emergency measures. One example is spice mixes from Pakistan, which are frequently checked due to their increased risk of aflatoxins (aflatoxins come from mould and therefore are part of the mycotoxins group in Figure 1). Table 1 lists all the herbs and spices that are subject to temporary increases of official controls at entry to the European Union, including the hazard and their origin.

Table 1: Herbs and spices subject to temporary increases in official controls in the EU (frequency of identity and physical checks, %)

	Country of Origin	China	India	Pakistan	Turkey
CN Code and product name	Hazard				
0904 22 00 - Sweet peppers (Capsicum annuum), crushed or ground (only certain products)	Salmonella	10			
0908 11 and 090812 - Nutmeg (Myristica fragrans) (all)	Aflatoxins		30		
0904 21 10 - Capsicum peppers, sweet or other, crushed or ground (all), and certain products within 0904 21 90 and 0904 22 00.	Aflatoxins		10*		
0909 31 00 and 0909 32 00 - Cumin seeds and ground cumin seeds	Pesticide residues		20*		
0910 91 10 and 0910 91 90 - Spice mixes	Aflatoxins			50	
0909 31 00 and 0909 32 00 - Cumin seeds and ground cumin seeds	Pyrrolizidine alkaloids				30**

Source: EUR-Lex (06/02/2024)

\*Listed since the update of 27/06/2023

There is another table in EU Regulation 2019/1793 that lists products that have special import conditions because of contamination risks. Annex 2 gives special import conditions for food consignments that:

- consist of products that come from multiple origin countries, or
- contain two or more ingredients from Table 2 (below), and the ingredients make up more than 20% of the total product.

For these consignments, a frequency of identity and physical checks as a percentage is applied to make sure that contamination hazards remain under control. In other words, for the products in Annex 2 (Table 2 below), the import conditions are stricter then for the products of Annex 1.

Table 2: Spices and herbs subject to special conditions for import to the EU (frequency of identity and physical checks, %)

	Country of Origin	Brazil	Ethiopia	Indonesia	India	Sri Lanka
CN Code and product name	Hazard					
0904 - Pepper of the genus Piper; dried or crushed or ground fruit of the genus Capsicum or of the genus Pimenta	Aflatoxins		50			
	Pesticide residues				20	
0904 11 00 - Black pepper (Piper nigrum) (only few products)	Salmonella	50				

<sup>\*\*</sup>Listed since the update of 06/02/2024, previously this value was 20

	Country of Origin	Brazil	Ethiopia	Indonesia	India	Sri Lanka
CN Code and product name	Hazard					
0904 21 10 - Peppers of the genus	Pesticide residues				0*	
Capsicum (sweet or other than sweet)	Aflatoxins					50
0904 21 90 - Dried fruit of genus Capsicum or Pimenta, neither crushed nor ground (only few products)	Aflatoxins				0*	50
0904 22 00 - Peppers of the genus Capsicum (sweet or other than sweet) (only few products)	Pesticide residues				0*	
	Aflatoxins					50
0908 11 00 and 0908 12 00 - Nutmeg (Myristica fragrans)	Aflatoxins			30		

	Country of Origin	Brazil	Ethiopia	Indonesia	India	Sri Lanka
CN Code and product name	Hazard					
0905, 0906, 0907, 0908, 0909 vanilla, cinnamon, cloves, nutmeg, mace and cardamon, seeds of anise, badian, fennel, coriander, cumin, caraway, juniper berries	Pesticide residues				20	
0910 - Ginger, saffron, turmeric (curcuma), thyme, bay leaves, curry and other spices	Aflatoxins		50			
	Pesticide residues				20	

Source: EUR-Lex (06/02/2024)

## Tips:

Stay up to date with updates on official controls on the European Commission website. The list is updated regularly. Even if your country is not on the list, be aware of the most common contaminations for your products and implement all preventive measures you can.

Search the RASFF database for examples of withdrawals from the European market.

Subscribe to the European Food Safety Authority (EFSA) newsletter (free) for news about European food safety developments.

Implement a HACCP system into your daily practice. Even if HACCP is not required in your country, exporting to the EU means you will have to comply with European food safety regulations.

<sup>\*</sup>New values since the update of 27/06/2023

## **Control of pesticide residues**

The EU regulation on Maximum Residue Levels of pesticides sets maximum residue levels (MRLs) for pesticides in or on food products. Products containing more pesticide residues than permitted are taken off the European market. In 2023, 42% of all issues reported in RASFF related to excessive pesticide levels or traces of illegal pesticides.

The most frequently found excessive levels in spices and herbs were:

- Ethylene oxide (EtO) and its metabolite 2-chloroethanol (2-CE): both are banned in the EU. One out of 4 pesticide issues was with EtO in 2023.
- Chlorpyrifos: the MRL is 0.01 mg/kg for spices and herbs. 24% of all pesticide issues concerned excessive levels of Chlorpyrifos.
- Pesticide cocktails ranked third in 2023, accounting for more than 20% of all pesticide issues. Cocktails
  means a mix of two or more pesticides.

The EU regularly updates its list of approved pesticides. In 2022, the European Commission adopted proposals to reduce the use and risk of chemical pesticides by 50% by 2030 (SUR). However, this Sustainable Use of Pesticides Regulation (SUR) plan was withdrawn in February 2024, after being rejected by the European Parliament in November 2023. The European Commission will likely present a more balanced approach and updated regulation in the course of 2024.

## **Dehydration factors**

Residue levels in dried spices and herbs are higher than in fresh products. This must be taken into account when assessing residue levels because the MRLs are based on fresh produce.

For dried herbs and spices, Article 20 of the MRL regulation allows for exceptions to the MRLs caused by drying processes. The European Spice Association (ESA) recommends specific dehydration factors for spices and herbs, ranging from 3 for dried garlic to 13 for coriander leaves. These dehydration factors do not apply to seed spices.

## Synthetic pesticides not allowed in organic production

The use of synthetic pesticides is not allowed in organic production. In practice, a very low residue level (often 0.01 parts per million) is permitted if you can prove it is the result of cross-contamination and not illegal pesticide use.

## Tips:

Select your product or the pesticide you use in the EU pesticide database for a list of relevant MRLs.

Follow the ongoing reviews of MRLs in the EU to prepare for potential changes in MRLs.

Apply Integrated Pest Management (IPM) to reduce your use of pesticides. This is an agricultural pest control strategy that uses natural control practices in addition to chemical spraying. See the FAO website for more information about IPM.

Work closely with farmers to manage and reduce the use of pesticides in the cultivation of herbs and spices. Engage plant protection experts who can guide and advise farmers on the sustainable use of pesticides.

Consider heat treatment instead of EtO fumigation to reduce the risk of insect contamination.

### **Control of contaminants**

Food contaminants are substances that have not been intentionally added to food. They may be present in herbs and spices as a result of production, packaging, transport, holding or environmental contamination. Contaminants can pose a health risk to consumers. To minimise these risks, the EU has set maximum levels for certain contaminants in food and ingredients.

#### **Bacterial contaminants**

The EU regulation on microbiological criteria for foodstuffs lays down the microbiological criteria for certain micro-organisms and the rules that food business operators need to comply with. It does not set specific limits for herbs and spices.

The most common type of bacterial contaminant in spices and herbs is salmonella. Salmonella must be completely absent in spices and herbs. It is usually transmitted via contaminated irrigation water, manure, hands or animals if products are dried outside. In 2023, more than 17% (43) of all 248 issues reported in the RASEE database related to salmonella.

Black pepper from Brazil is still the largest contributor to the salmonella issues subgroup, but the number of salmonella issues caused by Brazilian black pepper went down drastically from 45 in 2022 to 20 in 2023. This was largely due to a 36% lower export volume to Germany, which has always been the main country reporting these issues in RASFF. Origin countries for which the number of reports increased substantially were Egypt (from 3 in 2022 to 6 in 2023) and Turkey (from 1 to 5).

Another relevant contaminant limit for herbs and spices is for Bacillus cereus, which is limited to 100cfu/g. Too high levels have been found several times in recent years, mainly in ground spices.

### Tips:

For more information on the EU's management of food contaminants, take a look at their factsheet on how the EU ensures that our food is safe.

Comply with the Codex Alimentarius Code of Hygienic Practice for Low Moisture Food (CXC 75-215) and the International Organisation of Spice Trade Associations' General Guideline for Good Agricultural Practices on Spices & Culinary Herbs to prevent contamination.

Heat sterilisation is a natural, chemical and radiation-free option that is popular amongst European buyers. Heat sterilisation equipment is quite expensive, so it might be best to use a third party.

Keep your food safety testing practices up to date, by automating and computerising your processes, for example.

Follow the latest food safety news from EFSA.

## **Mycotoxins**

In 2022, approximately 11% of all issues reported in the RASFF database were due to mycotoxins. Mycotoxins are toxic compounds that are naturally produced by fungi, more commonly called moulds. The most common mycotoxins in herbs and spices are aflatoxins and Ochratoxin A. Aflatoxin contamination can take place in several spices including nutmeg, dried chillies, turmeric and ginger. The RASFF database shows that it is frequently found in nutmeg of Indonesian origin.

To protect consumers, the EU has set aflatoxins and ochratoxin A limits for specific herbs and spices (see Commission Regulation (EC) 1881/2006).

Table 3: Aflatoxin limits for specific spices and herbs in the European Union

Mycotoxin	Product	Limit (µg/kg)
Aflatoxins	Dried chillies and paprika, pepper, nutmeg, ginger, turmeric, mixtures of spices containing one or more of the listed	5 for B1 10 for sum of B1, B2, G1 and G2
Ochratoxin A	Spices and mixtures of spices (except dried chillies and paprika)	15
Ochratoxin A	Dried chillies and paprika	20

Source: EUR-Lex (25/05/2023)

Ochratoxin A was the subject of scientific research in the EU between 2018 and 2022. Studies have suggested that ochratoxin A may be genotoxic (causing genetic mutations) and carcinogenic (causing cancer). So far, these studies have not resulted in sharp reductions in the EU's limits.

#### **Plant toxins**

Since December 2020, following Commission Regulation (EU) 2020/2040, there have been maximum limits put in place for certain foodstuffs containing pyrrolizidine alkaloids (PA). In addition to the limit of 400  $\mu$ g/kg for cumin seed and most dried herbs, there is a higher limit of 1,000  $\mu$ g/kg in place for borage, lovage, marjoram, oregano and mixtures of these herbs. The number of reported issues grew from 8 in 2022 to 13 in 2023, primarily caused by excessive PA levels in cumin from Turkey.

Plant toxins can be transmitted to spices and herbs from weeds like:

- ragwort (Jacobaea vulgaris),
- Datura stramonium,
- black nightshade (Solanum nigrum), and
- potato berries.

## Polycyclic aromatic hydrocarbons (PAH)

Smoke contains polycyclic aromatic hydrocarbons (PAH), most notably benzo(a)pyrene. PAH can increase the risk of cancer. Because of this, the EU has set PAH limits for spices and herbs (except cardamon and smoked Capsicum spp):  $10\mu g/kg$  for benzo(a)pyrene and  $50\mu g/kg$  for the sum of all PAHs.

High PAH levels can be the result of high heat, using fossil fuels and/or a long smoking process. Although excessive levels of PAHs in spices and herbs are uncommon, heating and smoking do pose a risk. Crushed spices absorb more smoke than whole spices. In both 2022 and 2023, 5 issues reported in RASFF were about high PAH levels. They concerned ginger, paprika, black pepper, turmeric and cinnamon.

#### Metal contaminants

Metals like lead naturally occur in the environment, such as in soil and in water. Pollution from human activity adds to metals being present in the environment too. As a result, metal residues can occur in food. Contamination can happen during food processing and storage.

The EU has had lead residue limits for spices since 2021:

- 0.60 mg/kg for fruit spices
- 1.5 mg/kg for root and rhizome spices
- 2.0 mg/kg for bark spices
- 1.0 mg/kg for bud spices and flower pistil spices
- 0.9 mg/kg for seed spices

In 2022 there were 3 and in 2023 there were 4 heavy metal contamination reports in RASFF. Lead and mercury were found in batches of turmeric, cinnamon, cardamom, chillies and cloves from Vietnam, Indonesia, Madagascar and Uganda.

#### Tips:

Apply integrated pest management practices, such as safe planting distances and early weed removal to prevent plant toxin contamination.

Minimise the risk of mycotoxin contamination through good agricultural, storage and processing practices. For example, dry your spices and herbs properly – preferably in thin layers – and keep them dry during storage and transport too. Refer to the Codex Alimentarius Code of Practice for the prevention and reduction of mycotoxins in spices. For information on the safe storage and transport of spices and herbs, see the Transport Information Service.

Check the national legislation in your target countries through the EUAccess2markets 'My Trade Assistant' tool. EU legislation only defines maximum levels of aflatoxins for the five spices mentioned above. For other spices, different national legislation on aflatoxins may apply.

Only use ISO/IEC 17025-accredited laboratories for the control of contaminants in herbs and spices. The presence of aflatoxins must be tested according to the EU regulation on methods of sampling and analysis for the official control of the levels of mycotoxins in foodstuffs.

For smoking, use non-coniferous wood that has not been chemically treated. Avoid fossil fuels or gas. Refer to the Codex Alimentarius Code of Practice for the reduction of contamination of food with PAH from smoking and direct drying processes.

## Labelling and packaging

The labelling of herbs and spices requires careful attention. The RASFF overview of 2023 contains 11 labelling issues (up from 8 in 2022), most of which relate to allergens. In a few cases, the allergen declaration was missing, but most concerned an undeclared allergen (celery, mustard, sesame).

Food imported into the EU must meet the legislation on food labelling. Bulk packaging labels must contain:

- Name and variety of product
- Batch code
- Net weight in metric system

- Shelf life of the product or best before date, and recommended storage conditions.
- Lot identification number
- Country of origin
- Name and address of the manufacturer, packer, distributor or importer

The lot identification and the name and address of the manufacturer, packer, distributor or importer may be replaced by an identification mark. Labels can also include details such as brand, drying method and harvest date. These batch details can also be included in the Product Data Sheet.

If the imported product will be going directly into the retail channel, product labelling must comply with the EU regulations on the provision of food information to consumers. This regulation defines nutrition labelling, origin labelling, allergen labelling and minimum font size for mandatory information more clearly. Regarding herbs and spices, celery and mustard must be declared as allergens. Spice mixes may also contain allergens, such as gluten, wheat and nuts. Sulphur dioxide (which is sometimes used as a preservative) must also be declared as an allergen.

#### Tips:

Read how to label your product on Food and Drink Industry Ireland's practical guide to food labelling.

Get an idea of what a Product Data Sheet can look like by taking a look at this example for organic nutmeg powder.

Take all possible forms of allergen contamination into account for the allergen declaration on the label.

Ask your buyer to approve your concept before you print your labels.

For product-specific packaging requirements, see our product studies.

Contact Open Trade Gate Sweden if you have specific questions regarding rules and requirements in Sweden and the EU.

## **Control of unauthorised agents**

The EU has strict regulations on what substances are allowed in foods. This is to ensure safe food for consumers. Regulation 1333/2008 sets rules for the use of additives such as colours and thickeners. For spices and spice mixes, the restrictions for colouring agents are especially relevant. Out of the 248 issues reported in RASFF for 2023, 7 related to the unauthorised use of colouring agents. This was significantly less than the total of 12 in 2022. Examples of colouring agents found are Sudan I, II, II IV.

Some spices, such as turmeric and dried chillies, are also applied as natural colour enhancers. This explains the use of additional, artificial colouring agents. However, such colouring agents are not allowed in spices and spice mixes in the EU anymore (note that this is different for seasonings).

## Fighting adulteration

Another issue is the adulteration of herbs and spices. The more valuable the product, the more likely adulteration is. Examples are vanilla extract made from tonka beans, oregano mixed with strawberry leaves and saffron mixed with cheap components.

Several organisations and projects have launched initiatives to fight food fraud. The ESA has published an

Adulteration Awareness Document and the UK Spice and Seasoning Association offers guidance on the authenticity of herbs and spices.

### Tips:

Read more about additives for spices and herbs in section 12 of the Food Additives Regulation.

Use Annex II of the EU Food Additives Regulation to check which food additives are allowed in Europe.

Follow the re-evaluation of food additives to prepare for potential changes in food additive limits.

Watch our masterclass on food fraud.

## Control of chlorate and perchlorate

In 2020, the EU set maximum levels of chlorate at 0.7 mg/kg for herbs and 0.07 mg/kg for fruit spices. A perchlorate MRL was only set for fresh herbs, at 0.5 mg/kg. The main source of contamination is the water used during processing, such as for washing, cleaning and steam sterilisation. Chlorinated detergents used to clean the facilities and processing equipment also pose a risk. In 2022 there was one issue reported in RASFF about cinnamon contaminated with chlorate.

Tip:

Control the use of water and detergents in your processing facilities to avoid contamination with chlorate or perchlorate.

## **Phytosanitary inspection**

The EU inspects food products to protect citizens, animals and plants from diseases and pests. Common tools are food inspections and phytosanitary certificates. Special phytosanitary certificates are issued for plants or plant products that can be reproduced within Europe after import, such as for food containing seeds. Herbs and spice traders only require phytosanitary certificates for seeds used for sowing and for fresh herbs and spices, such as garlic, ginger and fresh herbs. For more details on exporting fresh herbs to Europe, read the CBI's study about exporting fresh herbs to Europe.

## 2. What additional requirements and certifications do buyers ask for in spices and herbs?

European buyers often have additional requirements, beyond legal obligations. These often concern the European Spice Association's (ESA) quality minima for the product itself. Others relate to food safety, and sustainable and ethical business practices.

## **Product quality requirements**

Product quality is a key issue for European buyers. Several factors determine the quality of spices and herbs, including subjective aspects like flavour and colour. Buyers will often ask suppliers to comply with the ESA's quality minima.

While the applied quality criteria vary by product, several are used for all herbs and spices:

## **Cleanliness or purity**

Herbs and spices must be free from diseases, foreign matter, foreign odours and other issues. The ESA sets the maximum presence of external matter at 10 g/kg, and foreign objects should be smaller than 2mm in diameter. Some buyers use more specific indicators from the American Spice Trade Association (ASTA) Cleanliness Specifications. These can include the maximum presence of dead insects, excreta, moulds and other foreign matter. Other indicators in this category include ash level and acidity of the ash.

#### Moisture content

The ESA also sets the minimum moisture content for different spices and herbs. Some buyers may ask for a different moisture content.

## Mesh or particle size

This applies to powders. Powders are ground to pass through a sieve of a specific diameter in microns. 95–99.5% of the powder should pass through the specified sieve size.

#### **Odour and flavour**

Herbs and spices must have a characteristic odour and flavour. This mainly depends on the chemical components of the essential oil. The variety and cultivar also have an effect, as do the geographic, climatic and growth conditions.

#### **Essential oil**

The quality of spices and herbs is generally higher when the ash percentage is low, and the essential oil content is high. ESA sets a minimum essential oil content for most spices and herbs.

For some spices and herbs, internationally recognised standards set specific quality and specification criteria:

- Codex Alimentarius offers standards for cumin, dried thyme and black, white and green pepper.
- The United Nations Economic Commission for Europe (UNECE) has a standard for dried whole chillies.
- The International Standards Organisation (ISO) has product specifications for various spices, culinary herbs and condiments.

#### Tips

Ask your buyer for a Product Data Sheet so you can learn about the product requirements.

Take preventative measures, such as heat treatment or fumigation against contamination with insects. Do not use banned fumigants such as ethylene oxide.

Apply careful physical sorting and eye-hand control practices to check for foreign bodies in your products.

Use optical, metal and similar detectors as extra security to protect against contamination by foreign bodies.

## Irradiation

Irradiation is not often used for spices and herbs. Although the EU allows sterilisation by irradiation under the condition of labelling, European consumers do not appreciate irradiated food. Because of this, European buyers often require radioactivity contamination tests for imported spices and herbs.

## **Third-party laboratory tests**

The microbiological, chemical and physical conditions of the product are so important to buyers, that they increasingly ask for laboratory test reports. European buyers commonly ask for tests for more than 500 different pesticide residues. Deliveries are commonly accompanied by documentation from accredited laboratories. These documents should not be older than six months.

The laboratories must be accredited, which can be an issue for suppliers in some developing counties. In some countries, laboratories can only perform a limited number of tests, so they need to send samples to other countries for analysis. The Indonesian company Nusa Harvest found the local laboratory SUCOFINDO to do the analysis of a batch of vanilla beans and posted the first page of the analysis report on Instagram.

#### Tips:

Agree on the laboratory with your buyer and the analytical test methods used.

Study ESA's Quality Minima Document.

Follow ASTA's Good Manufacturing Practice Guide for Spices.

Get food safety certification. Check which food safety certification company to consult with your buyers. Examples are SGS, CIS, TÜV and Bureau Veritas.

Sample according to the European sampling regulations.

Figure 2: Laboratory test



Source: Pexels.com

## Food safety certification

Food safety is key for the European market. Although legislation already tackles a lot of potential risks, legislation alone is not enough. The 290 reported issues from 2022 in the RASFF database show that things can still go wrong. For this reason, importers prefer to work with producers and exporters who have a Global Food Safety Initiative (GFSI) recognised food safety system certificate.

For spices and herbs processors and traders who operate on an international scale, the most widely accepted certification programme is Food Safety System Certification (FSSC 22000). This is a third-party certification programme based on the ISO methodology.

Sooner or later, exporters to Europe will meet potential buyers that ask for International Featured Standards (IFS) or British Retail Consortium Global Standards (BRCGS) certification. These certification programmes may be interesting if you target certain European food retail markets.

Third-party certified programmes are an asset to your company and new buyers appreciate them. Nevertheless, serious buyers may also visit and/or audit new suppliers' production facilities.

## Sustainability compliance

Although less important than product and food safety requirements, social and environmental compliance is increasingly demanded by European buyers. This often means that suppliers have to undersign the buyer's code of conduct. Buyers may also ask for certification from a third-party scheme like Rainforest Alliance.

## **Codes of conduct**

Codes of conduct (CoC) vary from company to company, but they are often similar in structure and the issues they cover. In 2022, the ESA published guidelines for their members. Since a lot of European herb and spice companies are members of the ESA, you will likely come across these guidelines sooner or later.

Under this sustainability code of conduct, the ESA's members monitor their own and their suppliers' operations. The code's social criteria state that:

- Companies must comply with applicable legislation,
- Companies must conduct business in an ethical way,
- Child labour and forced labour are not allowed,
- Any form is discrimination is forbidden,
- Employees have the right of association and collective bargaining,
- Working hours shall comply with national laws, preferably at 48 hours per week at most,
- Wages and benefits meet the national legal standards and are enough to meet basic needs, and
- Working conditions must be safe.

In terms of environmental criteria, it requires:

- Compliance with applicable legislation,
- Ongoing efforts to reduce the use of resources, energy, and emissions, and
- Safe procedures for hazardous chemicals.

Since 2012, the most important sustainable industry initiative in Europe has been the Sustainable Spice Initiative (SSI). Participating companies – mainly large spice companies – share the ambition to grow the share of sustainably sourced products. The initiative recognises a basket of sustainability standards as meeting the benchmark for sustainable sourcing.

Social initiatives such as the Ethical Trading Initiative (ETI) and the Business Social Compliance Initiative (amfori BSCI) also have codes of conduct. These are not specific to and frequently used in the spices and herbs sector.

## Third-party certification: Rainforest Alliance and B Corp

Several third-party certification schemes set criteria for both social and environmental issues. The most important ones are Rainforest Alliance, Fairtrade and B Corp.

The Rainforest Alliance is quite a common certification scheme applied in mainstream agricultural value chains. Since 2022, the Rainforest Alliance and the Union for Ethical BioTrade (UEBT) have had a joint Herbs & Spices Programme in place. There are two types of certifications in this programme:

- Farm certification, with the UEBT/Rainforest Alliance requirements compiled in a Field Checklist and two system checklists: one for organisations in sourcing areas and another for organisations elsewhere.
- Supply chain certification, in which companies that buy from certified farms have to meet the Rainforest Alliance 2020 Sustainable Agriculture Standard's Supply Chain Requirements.

Probably the fastest growing sustainability certification scheme is B Corp. While Fairtrade certification – which we discussed in the chapter on requirements for niche markets – ensures that individual products meet high social and environmental standards, B Corp certifies entire companies. B Corp certification requires companies meet high standards of performance, accountability and transparency on a wide range of factors.

These factors include:

- employee benefits,
- charitable giving,
- supply chain practices, and
- input materials.

Companies can acquire the B Corp certificate by:

Demonstrating they have high social and environmental performance. The company must achieve what is known as a 'B Impact Assessment score' of 80 or above and pass a risk review.

Making a legal commitment by changing the corporate governance structure to be accountable to all stakeholders and not just shareholders.

Being transparent by allowing information about the company's performance on the standards to be publicly available on their B Corp profile on B Lab's website.

## **Transparency initiatives**

The Supplier Ethical Data Exchange (Sedex) is a well-known global initiative that aims to make global supply chains more transparent. Sedex is a global, collaborative forum for buyers, suppliers and auditors to store and share information.

The aim of sharing all this information is to manage performance on sustainability. This covers labour rights, health and safety, the environment and business ethics. As such, Sedex is not a certifiable scheme nor a standard-setting body. By participating in this platform, companies show their willingness to share data and use information to manage and improve ethical standards in the supply chain.

The Sedex organisation has also developed social auditing standards: the 'SMETA' (Sedex Members Ethical Trade Audit). This auditing template helps companies to assess suppliers' working conditions in the social, ethical, and environmental domains.

### Overview of certifications and CoC

Table 3 provides the most important certifications and codes of conduct for the herbs and spices sector, along with information about the costs and the process. Note that some important costs components of certification are 'hidden.' This means that these are hard to quantify, but you will likely find them in the offer of potential service providers. The most important hidden costs are:

- Travel costs for the auditors time and expenses.
- Accommodation costs for the auditors.
- Non-Conformity/Corrective Action Review.

In addition, it should be clear that any preparation for certification may require you to invest in your facilities or quality assurance and control system.

Last but not least, if a company is applying for certification against different schemes with the same certification body, the certification body will likely be able to offer a discount on the total certification costs.

Table 4: Most important certifications and CoC requested by buyers in the spices and herbs sector

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
Food Safety System Certification (FSSC 22000)	Food safety	There is no fixed fee. It depends on the company size, number of audit days and number of products. The number of products influences the cost for companies with <20 employees, but it is typically €1,500-3,500. This excludes the fees for recurring, annual 'surveillance audits'. The audit certificate is valid for three years.	Germany The Netherlands Spain France Denmark, Sweden and Norway	Preparation: courses per country. Service providers: certification bodies.

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
British Retail Consortium Global Standards (BRCGS)	Food safety for suppliers to UK food retail	There is no fixed fee. It depends on company size, number of products and the role in the supply chain. Typical certification costs for a small company with up to three products are €3,000-4,000. Audit frequency depends on the number of noncompliances (known as 'minors') in the initial audit. If the result from the first audit is sufficient, audits take place once per year, otherwise once per half year. There is an annual BRCGS service fee of £725 (2022).	Mainly UK retail Recognised in other West- European markets.	Consultant or certification body: partner sections of the BRCGS website.

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
International Featured Standards (IFS)	Food safety for suppliers to food retail	There is no fixed fee. Fees depend on the number of products, number of certification days and company size. For an SME with 3-5 products, the average price for a 2-day audit is €2,500-3,500. Recertification is required every year, which means yearly costs. The certificate is valid until the end of the second calendar year after the first certification date.	Germany France Recognised in many other European markets.	More information about the process: IFS portal. More details about the offer and costs: Certification Bodies. Consultants: IFS Consultants Database. Self-assessment: IFS Audit Manager smartphone application.
Sedex Members Ethical Trade Audit (SMETA)	Social audit focused on working conditions	Costs include a membership fee of £119 per production site and audit costs paid to the SMETA-approved agency. The costs of the first audit are agreed with the agency and are not fixed, but for most SMEs, it is €800-1,200.	The UK Germany Recognised in many other European markets.	More information about the process: SMETA guidance documents.

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
Fairtrade	Sustainability, including working conditions, environment, and ethical trade criteria.	There is no fixed fee. Certification costs for spices companies depend on the number of hired workers, number of products and number of facilities. For example, the fee for an SME with 20 employees and two products would be around €3,000 for the first year. This includes the fees for application, certification and processing. However, certified suppliers are likely to benefit from a premium price paid for their products.	The United Kingdom Germany, Switzerland and Austria Belgium, Netherlands	First assessment of potential certification costs: FLOCERT Cost Calculator.

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
Rainforest Alliance	Sustainability, including working conditions and environmental criteria	There is no fixed fee. Costs are set by the certification body. In additional to the usual certification costs, there is also a volume-base royalty to be paid. However, certified farmers can benefit from a small price premium paid for their products.	Mainly Western and Northern Europe.	Certification costs: authorised certification body directory.

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
B Corp	Social and environmental criteria: employee benefits, charitable giving, supply chain practices, input materials.	There are fee bands in place to ensure B Corp Certification is affordable for all businesses. Contact the B Corp contact point to get an idea of the certification costs. For African companies with annual sales below \$150,000 (USD), the annual certification fee is \$600. There is a small fee of \$100 to be paid in the assessment phase, but that will be deducted from the first annual certification fee.	Started in North America. Now it is global movement with headquarters per continent. B Corp certified organisations can be found all over Europe, but mostly Western and Northern Europe.	Get more familiar with B Corp certification via their YouTube videos, such as this introduction to B Corp. Read the B Corp small enterprise guide to get an idea of how to become ready for B Corp certification. Check the B Global Network to find the B Corp contact point in your region or country.

Name	Туре	Cost for companies	Most used in European end-market (s)	Further information on getting certification
Organic	Environmental criteria	Products must be certified at the farmer level before being processed. The fee for individual farmers is considerably lower if famers are united in an association and pay a joint fee. Averages fees are around €1,000 for SMEs and the certificate must be renewed every year.	European Union, note that all European countries have their own national organic labels	Certification costs: authorised control bodies per country.

Source: Globally Cool

## Tips:

Read the ESA's sustainability code of conduct to prepare for future sustainability requests from European buyers.

Read CBI's Social Certifications Study to get an update on trends and developments in social compliance codes of conduct and certifications.

Consider implementing a management system focussing on or incorporating sustainable or ethically responsible production.

Ask your farmers to fill out the Sustainable Agriculture Initiative's <u>Farmer Self-Assessment</u> <u>Questionnaire</u> to check how sustainable their production is.

## 3. What are the requirements and certifications for spices and herbs niche markets?

Most additional buyer requirements apply to mainstream herb and spice markets. However, some niche markets have their own, specific requirements. While Fairtrade lays down requirements for sustainability in the social, environmental and ethical domains, product certification for the organic market mainly focuses on environmental requirements.

## **Sustainability certification**

Although it is less important than product and food safety requirements, European buyers are increasingly demanding sustainability. The most obvious market in Europe for sustainably sourced products is the fairtrade market.

#### **Fairtrade**

The fairtrade market is built on fairtrade certification. Every player in the supply chain needs to be certified to participate in this market. The fairtrade market is privately regulated.

In the global fairtrade market, there are several fairtrade certification organisations. Fairtrade International is the largest one. It gives you access to the European market and most other international markets, except the United States of America. An example of a smaller, more regional certification organisation is Fairtrade Original from the Netherlands.

Fairtrade International has specific standards for herbs, herbal teas and spices from small-scale producer organisations. This defines minimum prices and price premiums for conventional and organic products from several countries and regions. For herbs and spices without a fixed Fairtrade Minimum Price or fixed Fairtrade Premium, the Fairtrade Premium is set at 15% of the commercial price.

#### Tips:

Watch Fairtrade International's introduction video to learn how the Fairtrade system works.

Check Fairtrade International's standard for herbs, herbal teas and spices and other Fair Trade Standards relevant to your production, processing and trade.

If you want to sell your herbs and spices as organic in Europe, they must be grown using organic production methods that comply with EU organic legislation (Regulation (EU) 2021/2306 supplementing Regulation (EU) 2018/848). Growing and processing facilities must be audited by an accredited certifier. Regulation (EU) 1235/2008 lists requirements for organic products to be imported to the EU from third countries.

The certification procedure roughly follows these five steps:

Develop an organic farm management plan and implement organic production practices step-bystep. Familiarise yourself with the requirements for organic production and if possible, use local consultancy services.

Apply for certification when you meet the requirements. Select and negotiate a certification fee with an EU-recognised control body listed in Annex III of Regulation (EU) 1235/2008.

Arrange for inspection. An inspector verifies whether your organic farm management plan is true to reality. If they find critical non-conformities, you must correct these.

Become certified. If you have completed Step 3 successfully, a certificate will be issued, valid for one year. You can then put the EU organic logo on your products. You have to print the certifier code number together with the logo.

Manage batch documentation. Each batch of organic products imported into the EU must be accompanied by an electronic certificate of inspection (e-COI), as defined in Annex V of Regulation (EC) No 1235/2008. This electronic certificate of inspection has to be generated via the Trade Control and Expert System (TRACES).

## **Dual certification**

Dual certification is a clear asset in both the European fairtrade and organic markets. Consumers in these markets are typically more conscious than mainstream consumers. Because of that, they are more likely to appreciate and buy products that have both a fairtrade and an organic certification logo.

Examples of spices and herbs producers that have obtained both organic and fairtrade certification are:

- Ceylbee International from Sri Lanka. Their spices products include pepper and cloves. In addition to the Fairtrade certificate, the company has organic certification for the EU, USA, Japan and Malaysia.
- Shochoch Trading from Ethiopia produces and exports coffee, honey and spices. Their range of spices consists of turmeric and ginger (both fresh and dry), bird's eye chilli, black cardamom, black pepper, and long pepper and herbs. Their ginger and turmeric bear the fairtrade logo.
- Pure Life from Egypt is a producer and exporter that holds a fairtrade certificate for a wide range of dried herbs from Egyptian origin. They trade both organic certified and non-organic herbs. The company also runs a processing unit in Hamburg, Germany.

Figure 3: Promotional movie of the Indonesian dual-certified spice producer Mega Inovasi Organik

Source: Mega Inovasi Organik @ YouTube

## Tips:

Consider investing in organic production. Make a cost-benefit analysis to determine if it is worthwhile for you. Investigate the market potential and potential customers. Even if demand is growing, you need to know what the price premium will be and if it compensates for production costs, which are likely to be higher.

Find a potential customer who is interested in your organically certified herbs and spices (either actual or hypothetical). Engage them in the process and ask for support where relevant, such as for the batch documentation procedure.

Try to combine organic certification with other sustainable initiatives (dual certification) to increase your competitiveness.

Check the guidelines for the imports of organic products into the EU to familiarise yourself with the requirements for European traders.

Consult ITC Standards Map for a full overview of relevant certification schemes and their requirements.

Globally Cool carried out this study on behalf of CBI.

Please review our market information disclaimer.