

# What requirements must natural food additives comply with to be allowed on the European markets?

Last updated:  
18 April 2024

Natural food additives must be safe for human consumption and packaged safely to enter the European market. This means you must have a food safety management system in place as an exporter to become successful in Europe. Offering traceable and sustainable products is also becoming more and more important in light of the European Green Deal. Expect buyers to demand proof of your product's traceability, safety and quality before they will buy from you.

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## 1. What are mandatory requirements for natural food additives?

As an exporter of natural food additives, you must ensure the safety of your products for use in the European market. When exporting to Europe, you must comply with the legally binding requirements of the European Union (EU). The most crucial requirements are related to safe trade in chemicals and food safety.

### Food safety

To enter the European food market, you must comply with several regulations that guarantee food safety. One of these is the [General Food Law](#) and its [Regulation \(EC\) No 178/2002](#). This law mainly sets requirements for traceability, hygiene, and control. Compliance with this legislation ensures that your natural food additives are safe to eat and that legal limits for food contaminants are not exceeded.

Important for the control of food safety hazards throughout the whole supply chain is the implementation of food safety management based on [Hazard Analysis and Critical Control Points \(HACCP\)](#) principles. HACCP planning consists of consecutive steps to:

- identify food safety hazards;
- determine how you can control them (the so-called Critical Control Points or CCPs);
- setting corrective measures for when you cannot guarantee the safety of the foods produced.

As part of its efforts to protect its consumers, the EU carries out regular [official controls](#) at the border and at all further stages of marketing. In case of non-compliance with the European food legislation, individual cases are reported through the [Rapid Alert System for Food and Feeds \(RASFF\)](#), which is freely accessible to the general public. In most cases of non-compliance, European importers will not pay for the product or demand their money back. Additionally, a food safety issue will damage your reputation on the market.

Be aware that repeated non-compliance with [European food legislation](#) by a particular country might lead to special import conditions or even suspension of imports from that country. Those stricter conditions include laboratory tests for a certain percentage of shipments from specified countries.

For instance, the European Commission has banned titanium dioxide (E 171) as a food additive in the EU as of 2022. This is the result of an updated safety assessment by the European Food Safety Authority (EFSA) as it is not considered safe as a food additive and genotoxicity could not be ruled out. Other examples of banned food additives in the EU are brominated vegetable oil (BVO) and Sudan dyes.

### Tips:

Read the EU's [guidance on regulatory compliance with the EU's General Food Law](#). Doing so will give you a greater understanding of a mandatory requirement you must comply with to enter the European market.

Read the EU's factsheet on [food traceability](#), which provides useful information and guidance about food traceability in the EU.

Read more about the HACCP principles and how to implement it on [page 23 to 33](#) of the [Codex Alimentarius on food hygiene](#). Remember that HACCP schemes can be developed with the aid of consultants specialised in implementing food management principles.

Read and comply with the EU's [Key Obligations of Business Operators](#), as they derive from [EU food safety legislation](#).

Search in the [European Union's Rapid Alert System for Food and Feed \(RASFF\) database](#) to see examples of withdrawals from the market and the reasons behind these withdrawals.

## Legislation on food additives and flavouring

[Regulation \(EC\) 1333/2008](#) sets rules for the use of food additives, including definitions, conditions of use, labelling, and procedures. In addition to the regulation, two of its annexes require your attention:

1. [Annex II](#) contains a list of food additives approved for use in foods and their conditions of use.
2. [Annex III](#) contains a list of food additives including carriers approved for use in food additives, food enzymes, food flavourings, nutrients and their conditions of use.

Every EU-approved food additive gets an E number. Food additives with an E number have passed safety tests and have been approved for use. The safety evaluations of food additives are done by the expert panel on [Food Additives and Flavourings \(FAF\)](#) of the [European Food Safety Authority \(EFSA\)](#). They examine all relevant scientific data, considering chemical and biological properties, potential toxicity, and estimates of human dietary exposure. Using this information, the panel makes conclusions about the safety of the intended uses of the food additive for consumers.

[Regulation \(EC\) 1334/2008](#) sets the rules for the use of flavourings in and on foods. Natural ingredients such as oleoresins, essential oils and some extracts are classified as flavourings and must comply with this regulation.

Note that European custom authorities will not allow food products on the market if they contain undeclared substances (i.e., adulterants) or additives or flavourings which are not permitted in the European Union.

### Tips:

Check for authorised additives and their uses by consulting the [food additives database by the European Commission](#).

Refer to the [food flavourings database by the European Commission](#) to check which flavourings are authorised in the EU.

See the [guidance documents on the EC Regulation on Flavourings](#), issued by the [European Flavour Association \(EFFA\)](#).

## Regulation on maximum levels for contaminants and pesticide residues

Your products must be safe for consumption and must not be contaminated by:

- physical elements (e.g., plastic residues, metal and dirt);
- chemical elements (e.g., pesticides); or
- biological elements (e.g., bacteria).

These contaminants could be substances unintentionally added to your product during the stages of production, processing, or transport, or due to environmental contamination.

The European Union has implemented regulations to control and minimise the presence of contaminants in food. Of importance are:

- [Regulation \(EC\) 396/2005](#) which sets Maximum Residue Levels (MRLs) for pesticides in or on food;
- [Regulation \(EU\) 2023/915](#) which sets maximum levels for certain contaminants in food, including mycotoxins, metals and processing contaminants.

These restrictions on raw materials also extend proportionally to derivative products, such as extracts and food additives. Products containing pesticides or contaminants above the permitted level will be withdrawn from the market.

### Tips:

Refer to the [pesticide database](#) of the European Commission to identify the MRLs that are relevant for your product.

Discuss with your buyer to understand their particular needs regarding MRLs. Certain industries may demand more stringent levels than those outlined in the regulation.

Reduce the amount of pesticides on your product by applying [Integrated Pest Management \(IPM\)](#). IPM is an agricultural pest control strategy which uses complementary strategies, including chemical management.

Read more about [contaminants in food](#) on the website of the European Food Safety Authority (EFSA).

Learn more about [EU rules on flavourings](#) on the website of the European Commission.

## Conditions for the use of extraction solvents

To ensure safety for consumers, the use of extraction solvents in the production of foods is regulated by the

European Union:

- [Regulation \(EU\) No 231/2012](#) outlines specific guidelines for the use of extraction solvents in food additives with an E number. For instance, the regulation describes that guar gum (E 412) may be partially hydrolysed by either heat treatment, mild acid or alkaline oxidative treatment for viscosity adjustment. The regulation also sets purity criteria, establishing maximum levels for solvent residues, whether used individually or in combination.
- [Directive 2009/32/EC](#) establishes a list of permitted solvents for all other foodstuffs and food ingredients. Annex I contains a list of authorised extraction solvents, their conditions for use and maximum residue limits.

European buyers usually verify compliance to the rules by checking information on extraction solvents and residue levels in your Certificate of Analysis (CoA - for an example, see this [CoA of Grionia simplicifolia](#)).

### Tips:

Only use permitted extraction solvents. Keep residues of extraction solvents below maximum residue limits. Provide information on the extraction solvent and residues in your Certificate of Analysis.

See our [manual on preparing a Technical Dossier for your natural food additives](#) to learn more about compiling a Certificate of Analysis.

See our study about entering the European market for oleoresins for food for more information about [permitted solvents for oleoresin extraction](#).

Keep in mind that extraction processes can for instance enhance tiny pesticide residues in your product's raw material. Therefore, closely monitor your laboratory analysis to ensure adherence to MRLs.

## 2. Classification, Labelling and Packaging (CLP)

Some natural ingredients such as certain essential oils are classified as hazardous. To ensure safety during transport and handling, special packaging must be used and warning labels must be included on the packaging.

[Regulation \(EC\) No 1272/2008](#) sets out the rules on classification, labelling and packaging (CLP) of substances and mixtures. This CLP regulation applies to food additives and flavours. The aim of this regulation is to identify hazardous chemicals, inform users about their hazards using standard symbols and phrases and provide rules on packaging.

In December 2023, the [European Commission reached some preliminary agreements](#) on the revisions of the CLP regulation, including classifying essential oils as 'potentially harmful chemicals'. The EU Parliament has already proposed an exemption for "renewable substances of botanical origin", such as essential oils. The European Parliament is now in the process of adopting the new regulation.

If your product is classified as hazardous, your [Safety Data Sheet \(SDS\)](#) as well as your label must include the relevant safety phrases, risk phrases and hazard symbol. Risk phrases indicate the main risks and hazards, while safety phrases indicate the safety measures that need to be taken because of those risks and hazards.

Figure 1: Example of hazard symbol required for clove oil



Source: [ECHA](#), 2023

### Tips:

Find out if your product is classified as hazardous in the [ECHA CHEM \(Chemicals database\)](#). This database is a useful tool to determine which symbols and warning phrases must appear on your label. Note that this database was launched in early 2024, and over the coming years it will be transferring information from the previous database: [classification and labelling database](#) on the website of ECHA. During the transition, users may need to consult both ECHA CHEM and the former platform.

Read [Understanding CLP](#) on the website of ECHA. This will give you a better understanding of the mandatory requirements you must meet to enter the European market.

Keep an eye on the developments around the CLP Regulation by following [IFEAT's LinkedIn page](#) to anticipate the potential threat and possibly additional requirements regarding the Classification, Labelling and Packaging of essential oils. You can also become a member of the [International Organization of the Flavor Industry \(IOFI\)](#) to receive the latest news on legislative developments and other relevant topics in the flavouring industry automatically.

Refer to the [Guidance on Labelling and Packaging](#), published by the European Chemicals Agency (ECHA). The guidance describes good practice on how to fulfil the obligations on implementing CLP.

See our manual on [preparing a Technical Data Sheet](#) for practical steps on how to make Safety Data Sheets (SDS).

Stay up to date on regulatory topics affecting the food ingredients industry by reading the Fi Global Insights on [regulation](#).

## Other labelling requirements

You are obliged to label your products if you want to export them to Europe. Your product needs to be labelled so European buyers as well as customs authorities, for example, can trace the origins of your product. Another reason is to ensure safety during transport and storage.

In addition to complying with the CLP Regulation, you must apply common export labelling rules. EU's labelling requirements are outlined in the EU's food additives and flavourings legislation: [Regulation \(EC\) No 1333/2008](#). Whether or not your product is intended for sale to the final consumer determines what labelling requirements you must comply with. This is outlined in chapter IV of the regulation, under Articles 21, 22 and 23.

In general, you must ensure that your labels include the following information in the English language, unless your buyer indicates otherwise:

- Product name;
- Batch code;
- Whether the product is destined for use in food products;
- Place of origin;

- Name and address of exporter;
- Date of manufacture;
- Best-before date;
- Net weight;
- Recommended storage conditions.

If you offer Organic certified ingredients, you should also add the name/code of the certifier and the certification number.

### Tips:

Make individual batches traceable with markings on each container. You should also register these batches in an administrative system, whether they are produced by blending or not.

Visit the [EPing website](#) for an overview of country-specific measures that could affect the trade of natural ingredients and that differ from international standards.

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

## International treaties to export natural ingredients: CITES and Nagoya Protocol

If you want to export natural ingredients as food additives, you also need to comply with international treaties. These are especially important if you produce wild-collected ingredients.

You need to comply with the [Convention on International Trade in Endangered Species of Wild Fauna and Flora \(CITES\)](#). CITES aims to protect endangered plants and plant products by regulating their trade. This convention provides a list of plant species that you cannot export/import or where export/import is restricted. If your product is listed in Annex A and Annex B of the EU wildlife legislation, [Regulation \(EC\) No 338/97](#), you need to get an export permit from your country's CITES authority. You will also need an import permit from the country you are exporting to. For instance, if you want to export to the Netherlands, you can [apply for the CITES import document](#) (in Dutch) at the Netherlands Enterprise Agency, RVO.

European [companies adopt diverse strategies when addressing CITES-related concerns](#). Certain companies avoid utilising raw materials enlisted in CITES, whereas others insist that species listed in CITES should originate from cultivation rather than wild collection. In all cases, suppliers are responsible for complying with current law and international standards, including CITES permits. As a supplier, it is also your responsibility to have the necessary documentation in place. European companies typically collaborate with you to acquire information and ensure adherence to EU regulations.

You also need to determine if and how the [Nagoya Protocol of the Convention on Biological Diversity \(CBD\)](#) applies to your product. This protocol aims to make sure the benefits of genetic resources and traditional knowledge are shared in a fair way. It provides guidelines for accessing and utilising genetic resources and traditional knowledge in [Access and Benefit Sharing \(ABS\)](#) agreements. ABS is especially important for wild-collected ingredients.

The European Union is a signatory of the protocol. [Regulation EU 511/2014](#) sets the rules for the implementation of the Nagoya Protocol at the EU level. Many other countries have signed this protocol and adopted it into national law. If your home country did as well, you need to comply with these national laws. European companies are legally required to follow those laws that are in force in your country regarding access and benefit sharing. Your buyers will expect you to be aware of and compliant with your country's regulations on this

topic.

Certain European companies require their suppliers to acquire the [Internationally Recognized Certificate of Compliance \(IRCC\)](#) from the [Access and Benefit Sharing Clearing House \(ABSCH\)](#). This certificate verifies that companies have legal access to genetic resources in accordance with the Nagoya Protocol. It is commonly required from suppliers in countries identified with a high risk of non-compliance with ABS regulations.

Figure 2: Video – The Nagoya Protocol and ABS, simply explained

Source: Naturvårdsverket, 2018

### Tips:

Refer to the [Access2Markets](#) portal to see if your product is subject to the CITES regulation. After filling in your product code, origin and destination country, the platform displays the CITES regulation under the specific import requirements.

Contact your [local CITES authority](#) if you are unsure whether you need an export permit for your ingredient.

See the [Convention on Biological Diversity \(CBD\)](#) website to verify if your country has signed the Nagoya Protocol.

Access the website of the [Access and Benefit-sharing Clearing-House \(ABSCH\)](#) and see how it can be of help to you. ABSCH is a platform for exchanging information on access and benefit-sharing and is a key tool to facilitate the implementation of the Nagoya Protocol.

See how European buyers deal with international treaties. For instance, read the [Position statement on the Convention on Biological Diversity \(CBD\)](#) and particularly on local legislations and regulations implementing the Nagoya Protocol by the Swiss multinational flavours and fragrances manufacturer [Givaudan](#).

## Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Regulation (EC) No 1907/2006 is concerned with the [Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\)](#). The REACH system aims to ensure a high level of protection of human health and the environment, including the assessment of hazards in substances. REACH is especially relevant for essential oil exporters.

However, from a legal point of view, essential oils for food are not subject to the same REACH documentation requirements as essential oils for other applications, such as fragrances. The European Union legislation on REACH requires suppliers of essential oils for these alternative applications to provide a lot more documentation. Essential oils for flavourings are exempt from REACH.

Nonetheless, in practice, European buyers of essential oils for flavourings often have the same documentation requirements as buyers of essential oils for other uses. Since they do not know how their customers will use the essential oil, they need to have all the documentation required for different potential applications, including flavourings and fragrances.

Note that exporters that supply less than 1 tonne annually do not need to register their product under REACH. This saves them a considerable administrative burden. The reason that these exporters can still supply to Europe is related to an underlying safety principle of REACH: greater quantities that are manufactured or imported pose greater risks to human health or the environment. A chemical substance that is imported or manufactured by a European company at less than 1 tonne per year falls outside the scope of REACH.

### Tip:

Read more about buyer requirements for essential oils in our study [Entering the European market for essential oils for food and drinks](#).

## 3. What additional requirements and certifications do buyers ask for in the natural food additives sector?

Many buyers have additional requirements which go beyond legislation. These are mainly focused on documentation requirements, sustainability, food safety management, and quality.

### Documentation

European buyers of natural ingredients require exporters to provide them with well-structured and organised product and company documentation. Buyers use it to verify whether you meet their requirements and specifications.

European buyers of natural ingredients usually expect exporters to provide them with a Safety Data Sheet (SDS), Technical Data Sheet (TDS) and Certificate of Analysis (CoA). Table 1 shows what information you need to include in these documents.

Table 1: What is contained in the Safety Data Sheet (SDS), Technical Data Sheet (TDS) and Certificate of



Safety Data Sheet (SDS)	Technical Data Sheet (TDS)	Certificate of Analysis (CoA) that matches
Product name, description and classification	Product name, description and classification	Specifications mentioned in the TDS
Hazard identification	Quality that you guarantee to supply	Pre-shipment samples approved by buyer
Information on safety measures	Information on applications	Contractual agreements with buyer
	Certificates	

Source: [ProFound](#)

### Tips:

Acquire an SDS, TDS and CoA for your natural ingredients and have them ready for European buyers. Additionally, when approaching buyers, inform them about the documentation you have.

See the CBI study [How to prepare technical data sheets, safety data sheets and sending samples for natural food additives?](#) This study provides information and guidance on preparing documentation as well as sending samples.

Review examples of technical documentation of raw materials or extracts that you use. For example, see this [Safety Data Sheet for organic peppermint essential oil](#) (PDF), this [Technical Data Sheet for agar](#) (PDF) and this [Certificate of Analysis for carrageenan](#) (PDF).

Ensure that any samples that you send to buyers match your documentation, as samples are assessed against documentation.

[Register and log in for free on 1-2-Taste](#), a B2B platform for natural food ingredients where you can review and download the product and technical specifications and the safety data sheets of hundreds of ingredients. It is also a good tool to monitor prices and find potential buyers and/or competitors.

## Quality management and food safety certifications

Food safety is a top priority in all European food sectors. You can therefore expect European buyers to request extra guarantees in the form of certifications. European buyers of natural food additives often require their suppliers to have the [ISO 9001](#) certification on quality management systems and the [ISO 22000](#) certification on food safety management.

In addition, for many European buyers the implementation of standards and certifications recognised by

the [Global Food Safety Initiative \(GFSI\)](#) is a minimum requirement. The most commonly used food safety management systems in Europe are [FSSC 22000](#), [BRCGS](#) and [IFS](#).

For some buyers, especially for large European companies, quality management requirements also apply to the production of the raw materials. In such cases, buyers want to ensure that the raw material used to produce the corresponding natural food additive is cultivated under Good Agricultural Practices (GAP). One of the most common certification schemes used in this regard is [Global G.A.P.](#) The [Farmer Sustainability Assessment \(FSA\)](#) of the [SAI Platform](#) is another popular tool used by European companies to evaluate quality management in raw materials production.

Figure 3: Examples of food safety certification



Source: standards websites

Table 1: Most important food safety and quality management certifications requested by European buyers

Certification name	Type of certification	Cost for companies	How to get certified?
ISO 9001: 2015	Quality management	Certification costs depend on factors such as company profile, sectors, annual turnover, number of sites and staff.	You can <a href="#">buy the standard through the ISO website</a> , which lists the requirements for essential features of a quality management system. If you want to certify your quality management system, look for an <a href="#">accredited certification body in your country</a> that offers ISO certification.

ISO 22000:2018	Food safety management system	Certification costs depend on factors such as your company's business activities and location.	You can <a href="#">buy the ISO standard through the ISO website</a> . Always look for an <a href="#">accredited certification body in your country</a> .
FSSC 22000	Food safety management system	Certification costs depend on factors such as your company's business activities and location.	Check the <a href="#">FSSC 22000 website</a> on how to become certified. Always look for an <a href="#">accredited certification body in your country</a> .
British Retail Consortium Global Standards (BRCGS)	Food safety management system	Certification costs depend on factors such as your company's business activities, size, and location.	Check the website to see <a href="#">how to get BRCGS certified</a> . Visit the BRCGS <a href="#">partner sections</a> to find a certification body.
International Featured Standards (IFS) Food	Food safety management system	Certification costs depend on factors such as your company's business activities, size, number of products, and location.	See the 'Roadmap to certification' on the <a href="#">IFS website</a> to learn how to get certified. Refer to the IFS website to find an <a href="#">accredited certification body in your country</a> .

Source: [ProFound](#)

### Tips:

Check with your buyers if they require food safety management certification. Consult with them which food safety management system they prefer as this may differ from buyer to buyer.

Refer to the Global Food Safety Initiative (GFSI) for [more information on internationally recognised food safety management systems](#).

Choose a food safety management system that is approved by the Global Food Safety Initiative.

If a buyer asks you for a certificate you do not have, but you do intend to get certified, show them you have a plan on how to gradually achieve the certification.

Refer to ITC's Standards Map to [identify food safety management standards relevant to your product](#). You can use ITC's Standards Map to review the main features of the selected standards and compare the requirements side-by-side.

## Quality requirements: adulteration, purity and consistency

Adulteration (the intentional addition of undeclared substances to a product) is a serious issue in the natural food additives trade. Adulteration causes the product to become unusable for the buyer. It loses the necessary properties to fulfil its intended function, and purification is usually either impossible or too costly. Strict controls are in place in Europe to detect potential adulterants. If adulteration is detected, you as a supplier will not be paid for your products and you will lose business with your buyer.

For instance, essential oils for food must be 100% pure (i.e., not mixed with any other essential oils that have similar characteristics) and 100% natural (i.e., not adulterated through the addition of any chemicals). If you dilute an essential oil with solvents, the product must be called a flavour or you must state that the oil is diluted (e.g., 20% in Propylene Glycol). When you have mixed your essential oils, you should call them a blend of essential oils.

European buyers generally send samples to laboratories to analyse them. These laboratories continuously improve their techniques to determine the purity of products. In case there are undeclared substances in your product, it is very likely they will be detected.

In addition, buyers appreciate quality consistency over the year through standardisation. They expect suppliers to standardise products by establishing [Standard Operating Procedures \(SOP\)](#) for collection/harvesting and processing practices (e.g., timing of harvest and blending early and late crops). Often buyers prefer a large volume with a consistent quality level over smaller batches of different qualities.

### Tips:

Only purchase raw materials from suppliers that you can trust. Explain to suppliers that mixing their materials with other materials is not allowed.

Inform your buyer if you add any substances to your product for preservation, for example. Also clearly indicate this in your product documentation.

Minimise variation in quality within a lot. Follow strict grading and sorting standards for raw materials selection. Variation in the physical properties of the raw materials also means that the essential oil content and chemical profile will vary.

Work together with a local university department to test your ingredient and gain knowledge on factors that influence quality. For example, identification of differences in quality from different sources can help to identify the best sources. You can then analyse the differences in production conditions between the sources to identify the factors that influence quality.

## Packaging requirements

Packaging requirements can differ from buyer to buyer, and therefore must always be agreed with your buyer. In general, European buyers demand high-quality ingredients. To meet these high requirements, you should preserve the quality of your products by always:

- Using packaging materials that do not react with your product.
- Storing your product in a dry, cool, and odour-free environment.

In the specific case of handling essential oil, make sure to always use [United Nations approved packaging for dangerous goods](#).

### Tips:

Always ask your buyer for their specific packaging requirements.

Consider using recycled and/or recyclable packaging materials, as sustainability is important for European buyers. Read this guide on packaging to [reduce environmental impacts](#) for information and guidance on ways to do this.

Read our specific factsheets on [essential oils](#), [seaweed hydrocolloids](#), [natural food colours](#), [gums](#), and [oleoresins](#) to learn about specific packaging requirements for these products.

Invest in good-quality packaging to protect your products during storage and transportation.

Read more about payment and delivery requirements in the CBI [Tips for organising your natural food additives export to Europe](#).

## Transparency and sustainability requirements

The EU is committed to environmental sustainability and sustainable growth, something it has made clear in the [European Green Deal \(EGD\)](#). As part of the EGD, new laws are proposed to increase the responsibility of European manufacturers to explain where and how products are produced and what impacts these have on people and the environment.

An example of these legislative changes is the proposal for a [Directive on corporate sustainability due diligence](#), which was adopted by the European Commission in February 2022. The new rules will ensure that businesses address adverse human rights and environmental impacts of their actions, including their value chains inside and outside Europe. This directive proposal is in line with the [Farm to Fork strategy](#), part of the European Green Deal. The Farm to Fork strategy aims for fair, healthy and environmentally friendly food systems across Europe.

A transparent supply chain is key to deal with sustainability concerns. Since 2021, [Regulation \(EU\) 2019/1381](#) sets the rules on the transparency and sustainability of the EU risk assessment in the food chain. While this regulation brings notable changes to the approval process for items such as food additives and flavourings, its direct impact on your company is improbable.

Nevertheless, European buyers face growing pressure to ensure their supply chains are sustainable. As such, one of the main aspects for European buyers to choose product suppliers is a traceable and transparent supply chain. They want to have guarantees that a product they buy matches product specifications and can be traced back to the source. This might mean that you need to put more rigorous traceability systems in place to be able to deliver the information that your buyers demand of you. It also means you should have information on production and labour practices, as well as environmental issues in your chain.

Buyers expect their suppliers to provide them with all the necessary information. Remember that such information is increasingly digitalised, making it important to follow this trend. Digitalising sourcing information provides improved transparency, increases access to information and statistics, and allows for more efficient purchase and payment processes. At the same time, it puts additional demands on your company to collect and disclose data.

European buyers may also specifically request that you comply with their code of conduct. Most such codes are based on the [UN Global Compact principles](#) or [Ethical Trading Initiative Base Code](#) and focus on issues such as human rights and fair working conditions and wages. Buyers expect their suppliers to follow these codes of conduct and often require confirmation in writing as part of business contracts.

Companies with global supply chains use [EcoVadis](#) and/or the [Sedex Members Ethical Trade Audit \(SMETA\)](#) to assess and audit their suppliers. Both sustainability reporting systems are recognised worldwide. EcoVadis covers four sustainability topics: environment, labour and human rights, ethics and sustainable procurement. As a company, you are either asked by your customers to undergo an EcoVadis assessment or you do it voluntarily. Doing it voluntarily serves as a check and external recognition of your sustainability status as a company. The assessment consists of a questionnaire tailored to the size and products of your company.

SMETA on the other hand is a social auditing methodology. Becoming a Sedex-certified member can give you a big competitive advantage if you wish to supply these large companies. Although SMETA is still a voluntary standard, it is likely to become a basic industry requirement in the coming years.

### Tips:

See the CBI study '[The EU Green Deal – How will it impact my business?](#)' for more information on the EU Green Deal and its implications.

Establish a traceability system and keep samples for each of your suppliers to trace the origin of a product in case a problem with quality occurs.

Consider implementing [Good Agricultural and Collection Practices](#) (GACP). This might help you to demonstrate sustainable sourcing. These guidelines provide technical guidance on cultivating, harvesting and handling of plants to ensure a good quality.

Register your company with the [Supplier Ethical Data Exchange](#) (SEDEX). This online platform provides a template of the typical information required by buyers. It also facilitates sharing this information with potential customers.

Make sure you can manage and trace your entire supply chain. Buyers are increasingly recommending the use of smartphone traceability apps, for instance [Dimuto](#).

Start gathering supply chain traceability information and consider sharing this information with your buyers so that, together, you can identify and address potential gaps. You can refer to this [briefing from Proforest](#) for more information on how to obtain traceability in your supply base and what types of information your buyers are looking for.

## 4. What are the requirements and certifications for natural food additives niche markets?

Verifying and/or certifying sustainable production represents a niche market in the natural food industry. However, it can add value to your product. Organic certification is the most common standard in the EU market for natural food additives. Other social and environmental sustainability standards and requirements include fair trade standards.

Certifying your ingredients may help you to prove the traceability of your products, as this is verified and documented by an independent third-party auditor. See the main certification standards in the table below.

Table 2: Most important product certifications requested by European buyers

Certification name	Type of certification	Cost for companies	How to get certified?
EU Organic	Organic	Costs vary and depend on set-up, scale, location and non-conformities.	Refer to <a href="#">Regulation (EU) 2018/848</a> to learn more about the legislative requirements. Access the <a href="#">list of recognised control bodies and control authorities</a> for EU Organic, issued by the EU.
FairWild	Social and environmental sustainability (wild-harvested species)	Calculations of the cost of the certification audit are made individually. They depend on the location, size and complexity of operations and include audit, evaluation, certification and office costs.	See the <a href="#">approved control bodies</a> and accreditation section on the FairWild website for further information about obtaining certification.
Fair For Life	Social sustainability for both wild and cultivated species	Certification costs vary depending on the size and complexity of operation, location of your operation and of producers.	Access the <a href="#">Fair for Life certification process</a> to learn about the steps that must be followed to become certified. Operators usually undergo a full recertification audit process every year.

Fairtrade International	Social sustainability	Access the <a href="#">cost calculator</a> of FLOCERT to get an estimate of your costs for getting Fairtrade-certified.	Consult this link to learn <a href="#">how to become a Fairtrade producer</a> . Operators usually undergo a full recertification audit process every 1-2 years.
UEBT certification programmes	Ethical sourcing and biodiversity	<a href="#">Certification fees</a> depend on the type of certification scheme: Ethical Sourcing system certification, ingredient certification and UEBT and Rainforest Alliance Herbs & Spices programme.	See the <a href="#">UEBT certification bodies</a> section on the UEBT website for further information about obtaining certification.
Rainforest Alliance	Environmental sustainability	Certification costs are not fixed. Companies must apply to the authorised certification body for an offer. Total costs include administrative costs, audit fees, a premium price paid to farmers, sustainability investment costs and a volume-based royalty.	Contact an <a href="#">authorised certification body</a> in your country to find out about their fees and process to get certified. Consult the <a href="#">guide for farmers</a> and the <a href="#">guide for companies</a> on how to get certified.



Kosher	Jewish dietary laws	After filling out an application form, this will be assessed after which you will receive a quotation. The simplicity or complexity of the product (from a kosher perspective, not necessarily from a manufacturing one) will play a major role in the costs for kosher certification.	Read <a href="#">these steps to get kosher-certified</a> .
Halal	Islamic dietary laws	The costs of Halal certification depend on factors such as the type and number of products being certified. By filling in an application form you will receive a quotation for Halal certification.	Read the <a href="#">Halal certification procedure</a> to learn how to get Halal certified. Select a certifier accredited by the <a href="#">World Halal Council</a> for recognition of your certificate in Europe.

Source: [ProFound](#)

Although the above-mentioned certifications are the most commonly used in the natural food additives industry, requirements may vary by buyer. Therefore, before getting certified you should talk to your buyers and verify their needs.

## Organic

For certain European companies, organic certification is a prerequisite to enter the market, as they only deal with organic products. Other companies may provide a range of products including both conventional and organic ingredients.

If you want to market organic ingredients to Europe, you need to comply with European requirements on production and labelling of organic products. In January 2022, the [new EU organic regulation \(EU\) 2018/848](#) entered into force. This regulation adds new checks for imported organic products. Compliance can entail a major shift in your company's processes. You need to move to permitted pesticides and fertilisers, control weeds naturally, implement a full traceability and internal control system and switch to only use permitted solvents during extraction (water, steam, or organic alcohol).

In the European Union, a product can have the organic production logo if it has been certified, and only if at

least 95% of the ingredients from agricultural origin are organically produced . Note that only certain food additives may be used: check the [positive list of additives](#) (Part A of Annex V).

### **Tips:**

Before you certify your product as organic, find out if there is a market for your product. Can you earn back your investment? Discuss with (potential) buyers if they would be interested in organic-certified natural ingredients.

Inform prospective buyers about certification you have obtained that proves you meet environmental and social standards and display this on your company website and marketing materials.

You can find information about [EU organic certification](#) on the website of the European Commission.

Organic certification can provide access to interesting niche markets. However, be aware that only a few European buyers are willing to pay a significant price premium for organic food additives.

## **Kosher and Halal**

Although actual demand for Kosher and Halal products is small, demand for certification of compliance against these religious standards is increasing. Kosher and/or Halal Certification allows food manufacturers to use the ingredients in Kosher and Halal products. European buyers aim to prevent exclusion from these markets. Many European buyers therefore now require Kosher and/or Halal certification.

For instance, Halal certification for gum arabic requires cleaning procedures according to Islamic law. Alcohol cannot be used in the processing. Certified Halal products must also be kept separated from “impure” products, such as products from pigs. A unified standard for Halal does not yet exist.

### **Tip:**

Explore the market and look into companies that provide halal and kosher products in Europe. Use the halal and kosher filters available under Certifications on the [1-2-Taste website](#). This will help you find out about the products and the companies that are involved in this specific market segment.

## **Social and environmental standards**

European consumers and retailers are putting increasing pressure on companies to ensure their products are made according to social and environmental standards. Some European product manufacturers have made meeting environmental and social standards part of their policy and strategy.

Whether or not European buyers of natural food additives are interested in certified ingredients depends on the type of product they produce and how they communicate their sustainability to their customers. If an ingredient makes up only a small share of an end-product, it is difficult to communicate its sustainability to consumers. This means that, in general, standards are used only incidentally for natural food additives.

### **Tips:**

Before getting certified, research your targeted market segment and talk to your buyers to determine

the certifications they demand, as this can vary from buyer to buyer.

Consult the [ITC Standards Map](#) for a full overview of certification schemes used in this sector.

See the CBI study '[What is the current offer in social certifications and how will it develop?](#)' for more information and tips on social sustainability standards.

[ProFound – Advisers In Development](#) carried out this study on behalf of CBI.

Please review our [market information disclaimer](#).

