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

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Strict regulation and legislation require natural food additives to be safe for human consumption 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 increasingly important because of the European Green Deal and consumer expectations. Good packaging is important too. It protects your product and helps with safety and traceability. Be ready to prove your product's quality, food safety, and traceability to your potential European buyer.

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1. What are the 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.

Please note that different groups of natural food additives are subject to different requirements. These depend on the type of additive and how it is used.

Legislation on food additives and flavouring

The most important rule for using food additives in Europe is that they must be on the EU's approved list. This list is part ofRegulation (EC) 1333/2008, which sets the legal framework for food additives. It includes definitions, conditions of use, labelling rules, and required procedures.

Two annexes to the regulation are especially important:

- Annex II contains the list of food additives approved for direct use in food products. It also shows the types of foods that can be used in and under which conditions, including maximum levels.
- Annex III lists food additives approved for use in other ingredients, such as other food additives, enzymes, flavourings, and nutrients. It also includes substances like carriers (used to help other additives work without altering their function), which are not directly added to food but are essential in the production of certain food ingredients.

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. For example: stevia is approved as E960. 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 draws conclusions about the safety of the intended uses of the food additive for consumers.

The lists of approved additives are regularly updated to reflect new scientific findings and changes in food safety regulations. Food additives can be added or removed based on ongoing safety evaluations. For example, Erythritol (E968), a sugar alcohol used as a sweetener, has been re-evaluated, and its safety confirmed for continued use in foods. On the other hand, some additives may be removed from the list if new evidence shows they may no longer be safe. Removal almost exclusively affects synthetic food additives.

Food additives used for flavouring purposes must comply with Regulation (EC) 1334/2008, which sets the rules for the use of flavourings in and on foods. This regulation ensures that all flavourings, including those derived from natural ingredients such as oleoresins, essential oils, and extracts, meet safety and quality standards. Natural flavourings, such as peppermint oil, paprika oleoresin and vanilla extract are classified under this regulation.

Note that European custom authorities also do not allow food products onto the market if they contain undeclared substances (i.e., adulterants), additives, or flavourings not approved for use in the European Union.

Tips:

Check for authorised additives and their conditions of use by consulting the European Commission's food additives database. See, for example, gum arabic, and curcumin.

Refer to the European Commission's food flavourings database 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).

Read the article EU Food Regulations: Ensuring Compliance for European Food Businesses by TraceX for a clear explanation of how EU food laws work and what they mean for your business.

Food safety

Your product must comply with strict food safety regulations to enter the European food market. These regulations are based on the EU's General Food Law and specified in Regulation (EC) No 178/2002. The General Food Law sets traceability, hygiene, and process control requirements. Compliance with this legislation ensures that your natural food additives are safe to eat. It does this by setting legal limits for food contaminants and making sure these limits are not exceeded.

To ensure food safety standards are met, you must apply a food safety management system based on Hazard Analysis and Critical Control Points (HACCP) principles. This system is essential for identifying and controlling food safety hazards throughout the supply chain.

HACCP planning involves:

- identifying food safety hazards;

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

Video 1: The seven principles of HACCP explained

Source: Food Forward Consultancy, 2024

The EU carries out regular official controls at its borders and during all stages of food marketing to ensure compliance with food legislation. If a product does not meet legal requirements, the product is rejected and the case is reported through the Rapid Alert System for Food and Feeds (RASFF). This system is publicly accessible and helps identify and track cases of non-compliance and food safety issues across the EU.

Non-compliance can have serious consequences. European buyers may refuse to pay for your product or request a refund. In addition, food safety rejections damage your reputation, which makes it harder to grow your exports to Europe.

The EU may introduce stricter import conditions if a country is repeatedly linked to food safety issues. These can include extra documentation, mandatory laboratory tests for a certain percentage of shipments, or a suspension of imports from that country.

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 them on pages 23 to 33 of the Codex Alimentarius on food hygiene. HACCP schemes can be developed with consultants specialised in

implementing food management principles. You can ask potential buyers for help as well.

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

Search the European Union's Rapid Alert System for Food and Feed (RASFF) database for your product to see examples of withdrawals from the market and the reason for withdrawal to learn about potential issues.

Regulation of maximum levels for contaminants and pesticide residues

Your products must be safe to eat and free from harmful levels of contaminants or pesticide residues. The contaminants and residues for which food additives are checked are:

- Physical contaminants such as plastic fragments, metal pieces, or dirt;
- Chemical contaminants such as pesticide residues, heavy metals like lead or mercury, or cleaning agents which may be used during production;
- Biological contaminants such as bacteria, moulds, or other microorganisms.

These contaminants can enter your product unintentionally during production, processing, transport, or through environmental exposure. Because of the potential health risks, the EU has set strict maximum levels for many contaminants in food products.

Two key regulations 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.

The rules for contaminants in raw materials also apply proportionally to products made from them, like extracts and food additives. If testing shows that your product contains too many pesticides or other contaminants, it will not be allowed on the European market.

As an exporter, you must ensure your products stay within these legal limits. This requires regular testing and good agricultural, manufacturing, and hygiene practices throughout the supply chain.

Tips:

Refer to the European Commission's pesticide database to identify the MRLs relevant to your product.

Discuss with your buyer to understand their requirements regarding MRLs. Certain industries and buyers demand lower residue levels than those outlined in the EU regulation. Especially companies active in high-end markets may have stricter rules on MRLs.

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 using extraction solvents in food additives with an E-number. For example, the regulation states that the viscosity of guar gum (E412) may be adjusted by heat treatment, mild acid or alkaline oxidative treatment. 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 approved extraction solvents, their conditions for use and maximum residue limits.

European buyers usually verify compliance with these regulations by checking the 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 CBI's study on entering the European market for oleoresins for more information on permitted solvents for oleoresin extraction.

Be aware that extraction processes can increase the presence of tiny pesticide residues in your product's raw material. Therefore, closely monitor your laboratory analysis to ensure adherence to MRLs.

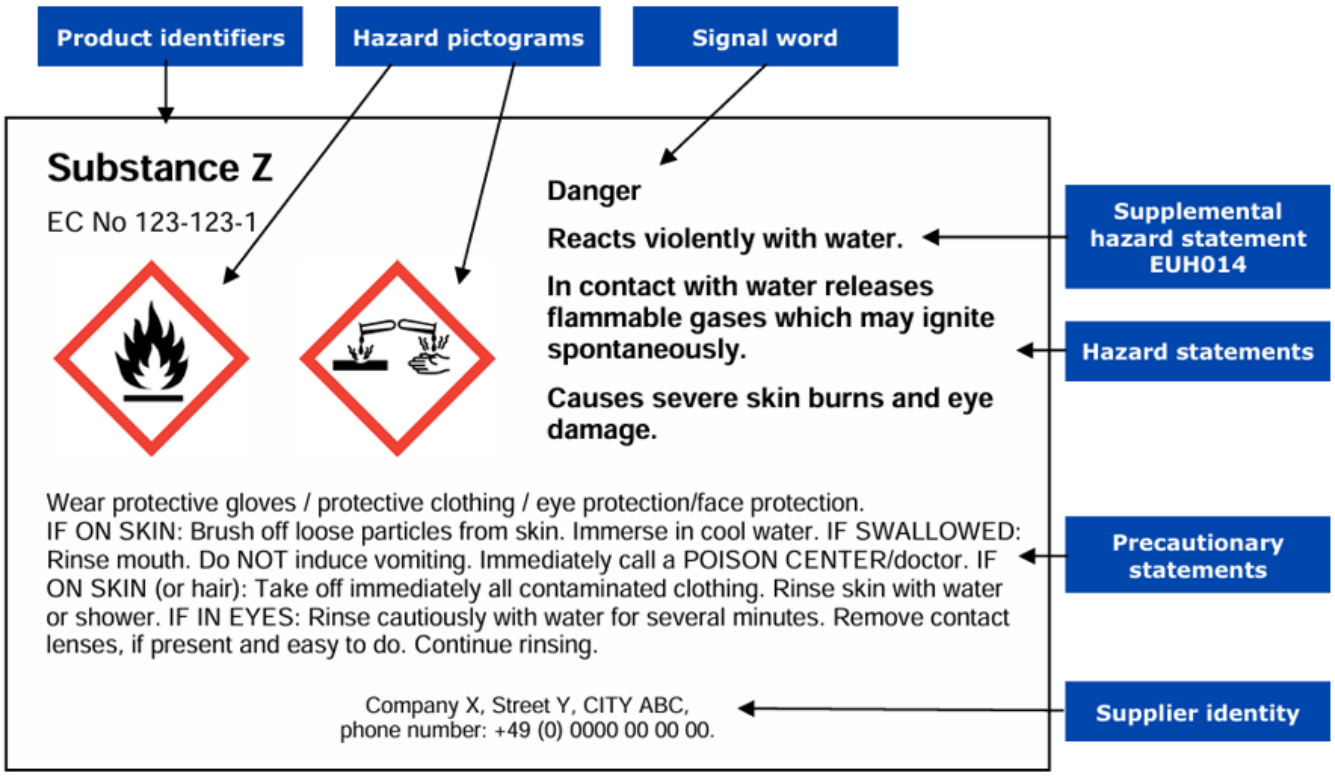
Classification, Labelling and Packaging (CLP)

Some natural ingredients, such as certain essential oils, are classified as hazardous. Special packaging must be used to ensure safety during transport and handling, 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. It defines how to identify hazardous chemicals, informs users about their risks with standard symbols and phrases, and specifies the requirements for packaging.

If your product is classified as hazardous and registered with the European Chemicals Agency (ECHA), your Safety Data Sheet (SDS) and label must include the relevant safety phrases, risk phrases, and hazard symbol. Risk phrases highlight the main hazards, while safety phrases outline the precautions to be taken. For example, peppermint essential oil and guar gum require additional labelling to indicate their potentially hazardous properties.

Figure 1: Example of a hazard statement label according to CLP regulations



Source: ECHA, 2023

In December 2023, the European Commission reached preliminary agreements on changes to the CLP regulation. At first, the new rules could have labelled essential oils as harmful, which would have limited their use. But changes were made to avoid this, because essential oils have been used safely in food for a long time. Now, essential oils are exempt from the rules, as they are seen as natural plant-based ingredients.

Tips:

Find out if your product is classified as hazardous in the ECHA CHEM (Chemicals database). This database is useful for determining which symbols and warning phrases must appear on your label.

Read Understanding CLP on the ECHA website. This will help you better understand the mandatory requirements for entering the European market.

Keep an eye on the developments around the CLP Regulation by following IFEAT's LinkedIn page to anticipate the potential additional requirements regarding the Classification, Labelling and Packaging of essential oils. Or check the website of the International Organization of the Flavour Industry (IOFI) to find the latest news on legislative developments and other relevant topics in the flavouring industry.

Refer to the Guidance on Labelling and Packaging, published by the European Chemicals Agency (ECHA). The guidance describes good practices on how to comply with CLP regulations.

See CBI's manual on preparing a Technical Data Sheet on how to compile a Safety Data Sheet (SDS).

Stay up to date on regulatory topics affecting the food ingredients industry by regularly checking Fi Global Insights on regulations.

Other labelling requirements

In addition to following the CLP Regulation, you must also comply with general export labelling practices. Your product needs clear labelling so your buyers and customs authorities can identify its contents and trace its origin. Proper labelling is also essential for safe handling during transport and storage.

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.

Labels on food additives not directly sold to consumers must include:

- Official name and/or E-number of the additive;
- Statement 'for food' or 'restricted use in food' or a more-specific reference to its intended food use;
- If relevant, an indication of special conditions of storage and/or use;
- Mark identifying the batch or lot;
- Instructions for use, if necessary;
- Name and address of the manufacturer, packager, or seller;
- Clear information about intake limits;
- Net quantity;
- Information on minimum durability or 'use by' date;
- List of all ingredients in descending order of their percentage by weight, if the product contains a mix of additives and/or other substances;
- Warning 'may have an adverse effect on activity and attention in children' if the product contains food colours.

Your label information must be in English unless your buyer requests otherwise.

If you offer organic-certified ingredients, you should also add the certifier's name and code and certification number.

Tips:

Find more information on labelling requirements for food additives through the European Union's Your Europe page.

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 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

You must follow international treaties like CITES and the Nagoya Protocol when exporting natural ingredients as food additives. CITES applies to additives from endangered or protected species and requires trade permits. The

Nagoya Protocol ensures the fair sharing of benefits for ingredients derived from genetic resources or traditional knowledge. These treaties help protect biodiversity and producing communities, and promote sustainable trade.

CITES

You must 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 or Annex B of the EU wildlife legislation (EC 338/97), you must get an export permit from your country's CITES authority. You 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 laws and international standards, including CITES permits. As a supplier, you must also have the necessary documentation in place. European companies typically collaborate with you to acquire information and ensure adherence to EU regulations.

Nagoya Protocol

You must also 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 fairly. 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.

Video 2: The Nagoya Protocol and ABS, simply explained

Source: Naturvårdsverket, 2018

Regulation EU 511/2014 sets the rules for implementing the Nagoya Protocol at the EU level. Many other countries have signed this protocol and adopted it into national law. 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.

Tips:

- Refer to the Access2Markets portal to see if your product is subject to the CITES regulation. After you fill in your product code and origin and destination country, the platform will display 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.
- Visit the Convention on Biological Diversity (CBD) website to learn if your country has signed the Nagoya Protocol.
- Visit 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. It also applies to other naturally-occurring substances that are chemically modified, like for example, supercritical CO_2 extracts that are chemically different from the natural source.

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.

But 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.

Note that exporters that supply less than 1 tonne annually do not need to register their products 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 CBI's study Entering the European market for essential oils for food and drinks.

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

Many buyers have additional requirements beyond legislation, including documentation, quality, traceability, sustainability, food safety management, and payment and delivery terms.

Documentation

European buyers need clear and well-structured product and company documentation to check if your product and company meet their requirements and product specifications.

Buyers require the Safety Data Sheet (SDS), Technical Data Sheet (TDS), and Certificate of Analysis (CoA). The SDS provides information on a product's safety and handling. The TDS details its technical specifications and quality properties. The CoA shows the results of laboratory tests and verifies that the product complies with the parameters of the TDS, and that it meets the agreed quality standards and residue levels.

Buyers also typically require documentation on manufacturing and processing, food safety, sustainability, and traceability.

Table 1: Seven-part documentation pack

	Document Name	Why To Include	What To Include
1	Technical Product Info	Buyers want to understand exactly what your product is and what makes it unique.	Latest Technical Data Sheet (TDS) Safety Data Sheet (SDS) Detailed product description (name, botanical name, composition, key characteristics)

	Document Name	Why To Include	What To Include
2	Certificate of Analysis (CoA)	Shows your product has been tested for quality and safety.	Physical, chemical, and microbiological test results Shelf life and stability testing under different conditions
3	Manufacturing Process Details	Buyers must know how your product is made, from raw material to final packaging.	A flowchart or written explanation of the production process Information on extraction, equipment used, and quality control steps
4	Food Safety Certifications	Builds buyer confidence and may be a requirement for large buyers.	HACCP (minimum requirement) ISO 22000, FSSC 22000, IFS, or BRCGS (for added credibility)
5	Sustainability and Additional Certifications	Buyers are under pressure to prove sustainability. Help them meet those goals.	Organic, Fair Trade, FairWild, or BioTrade certificates
6	Traceability and Legal Documents	Prove you're registered and legally allowed to export to the EU.	Business registration and export license Nagoya Protocol access permits (if applicable)
7	Buyer-Specific and Compliance Documents	Help buyers evaluate your offer quickly with targeted information.	Certificate of origin and statements of EU compliance Explanation of how your product is used in food products

Source: ProFound, 2025

Tips:

- Compile an SDS, TDS and CoA for your natural ingredients and have them ready for European buyers. 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 you send to buyers match your documentation, as samples are assessed against documentation.

Quality management and food safety certifications

European buyers prioritise food safety and often ask for extra guarantees in the form of certifications. For example, 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, implementing 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 GlobalG.A.P. , which sets international standards for safe and sustainable farming for producers and sellers of fresh fruits and vegetables. The Farmer Sustainability Assessment (FSA) of the SAI Platform is another popular tool European companies use to evaluate quality management in raw material production. The SAI Platform is a global organisation of food and drink companies working to promote sustainable agriculture. The FSA helps farmers show how sustainable their practices are, based on environmental, social and economic criteria. Some buyers accept FSA results (bronze, silver or gold level) as proof of good farming practices.

Figure 3: Examples of the most common food safety certifications

Source: standards websites

Table 2: 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	Costs vary based on company profile, sectors, annual turnover, number of sites and staff.	You can buy the standard through the ISO website, which lists the requirements for essential features of a quality management system. If you want to certify your quality management system, look for an accredited certification body in your country that offers ISO certification.
ISO 22000: 2018	Food safety management system	Costs vary based on the company's business activities and location.	You can buy the ISO standard through the ISO website. Always look for an accredited certification body in your country.

Certification name	Type of certification	Cost for companies	How to get certified?
FSSC 22000	Food safety management system	Costs vary based on the company's business activities and location.	Check the FSSC 22000 website on how to become certified. Always look for an accredited certification body in your country.
British Retail Consortium Global Standards (BRCGS)	Food safety management system	Costs vary based on the company's business activities, size, and location.	Check the website to see how to get BRCGS certified. Visit the BRCGS partner sections to find a certification body.
International Featured Standards (IFS) Food	Food safety management system	Costs vary based on the company's business activities, size, number of products, and location.	See the 'Roadmap to certification' on the IFS website to learn how to get certified. Refer to the IFS website to find an accredited certification body in your country.

Source: ProFound

Tips:

- Check with your buyers to what food safety management certification they require. 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.
- If a buyer asks you for a certificate that you do not have but intend to get, show them you have a plan 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 makes the product 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 will not be paid for your products, and will lose business with your buyer.

For example, essential oils used in food must meet strict purity requirements. They must be 100% pure, meaning they cannot be mixed with other essential oils, even if those have similar characteristics. They must also be 100% natural, meaning no synthetic substances or solvents are added. If you dilute an essential oil with a solvent, you must clearly label the product as diluted (for example, "20% in Propylene Glycol") or refer to it as a flavour, not an essential oil. If you mix two or more essential oils, you must label the product as a blend of essential oils.

European buyers generally send samples to laboratories to analyse to check for adulteration and purity. Well-known laboratories include Eurofins, SGS, and Intertek. These laboratories continuously improve their techniques to determine product purity. If your product contains undeclared substances, they are very likely to be detected.

Different end uses of natural food additives require different levels of quality. For example, generally, an additive used in a high-end organic product must meet stricter quality and purity standards than one used in a low-cost processed food. As a result, quality requirements vary between European buyers, depending on their market segment and product type.

If you want to export to Europe, it is important to understand the specific needs of your buyer and the final product your additive will be used in. For example, a buyer using paprika extract in a clean-label or organic product may demand natural origin, no synthetic solvents, full traceability, and organic certification. A buyer for conventional processed foods may focus more on colour intensity and cost-effectiveness, as long as the product is safe and complies with EU regulations.

In addition, buyers appreciate quality consistency over different batches. 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:

- Build trust with your raw material suppliers, and create awareness about adulteration and other malpractices.
- Tell your buyer if you add any allowed substances to your product to help preserve it. Write this clearly in your product documents. Discuss the intended end use of your product with your buyer to understand the required quality level.
- Minimise variation in quality within a lot. Follow strict grading and sorting standards for raw materials selection. For example, variation in the physical properties of the raw materials used to produce essential oils 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 influencing quality.

Packaging requirements

Packaging requirements differ from buyer to buyer and must always be agreed upon before shipping. European buyers expect natural food additives to arrive in perfect condition, free from contamination, spoilage, or damage, so proper packaging is key.

To meet these requirements, you should always:

- Use packaging materials that do not react with your product. For example, essential oils can react with some plastics or metals, so these should be avoided unless properly coated or lined.
- Store and transport your product in a dry, cool, and odour-free environment to prevent loss of quality or contamination.
- Choose airtight and light-resistant containers for sensitive ingredients such as natural colours (e.g. beetroot or turmeric extract), which can degrade when exposed to light, air, or moisture.

Special packaging is mandatory for certain products. For example, when handling essential oils classified as flammable or hazardous, you must use United Nations (UN) approved packaging for dangerous goods, which includes strong, leakproof containers and proper labelling according to international transport regulations.

Many European buyers are placing more value on sustainable and environmentally friendly packaging. This includes preferences for biodegradable or recyclable materials, reduced use of plastic, and reusable or refillable systems. As an exporter, offering eco-friendly packaging can make you more competitive.

Tips:

Always ask your buyer for their specific packaging requirements.

Check the UN Model Regulations on the Transport of Dangerous Goods for UN numbers and provisions regulating the transport of hazardous substances.

Consider using recycled and/or recyclable packaging materials, as sustainability is important for European buyers. For information and guidance on how to do this, read this guide on packaging to reduce environmental impacts.

Read our specific fact sheets 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 has set strong goals for sustainable trade through the European Green Deal. This is a large action plan to make Europe climate-neutral by 2050. It includes many new laws that affect how food products and ingredients are made, traded, and labelled. A key part of this is the Farm to Fork Strategy, which aims to make food systems fair, healthy, and environmentally friendly.

Buyers must implement and comply with the new laws. Therefore, to export food additives to Europe, you must

show that your supply chain is transparent and sustainable. European buyers need to know where your product comes from, how it is made, and what its impact is on people and the environment.

For food additives, this means you must be ready to show:

- Where your raw materials come from;
- How you manage risks for people and the environment;
- How you ensure good labour conditions in your supply chain.

One major new law, published in 2024, is the Corporate Sustainability Due Diligence Directive (CSDDD). This will require large European companies to check for human rights violations and environmental risks throughout their supply chains, including in countries outside the EU. Even though the law mainly applies to large companies, it will affect you as a supplier because buyers will ask you to provide detailed information.

This directive aligns with the Farm to Fork strategy, which specifically targets food and food production. It supports shorter supply chains, responsible sourcing, and reduced use of harmful substances.

Another important regulation is Regulation (EU) 2019/1381, which deals with transparency in the EU food chain. It affects how food additives, flavourings, and other ingredients are approved and evaluated. The main goal is to improve public trust and make the risk assessment process more open. This regulation may not directly affect your approval process as an exporter, but it will influence what information your buyers expect from you on traceability.

They want to know:

- That your product meets EU quality and safety standards;
- That it is produced under decent working conditions;
- That environmental impacts are well managed.

European buyers want guarantees that a product matches specifications and can be traced back to the source. This might mean that you need to put more rigorous traceability systems in place to deliver the information that your buyers demand. It also means that you should have information on production, labour, and environmental issues in your chain.

Information on traceability and transparency of the supply chain is increasingly digitalised. If you have the option, you should invest in following 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.

In addition, you may be asked to follow a code of conduct. Most codes of conduct are based on the UN Global Compact principles or the 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 written confirmation as part of business contracts.

Some companies with global supply chains use systems like EcoVadis and/or the Sedex Members Ethical Trade Audit (SMETA) to assess and audit their suppliers. These systems help assess your company's performance on social and environmental issues. Joining them can give you a competitive advantage.

- EcoVadis is a widely used sustainability rating platform that assesses companies on four key topics: environment, labour and human rights, ethics, and sustainable procurement. The assessment is based on a detailed questionnaire that is customised to fit the size, industry, and activities of your company.
- SMETA (Sedex Members Ethical Trade Audit) is a common social auditing methodology used to assess working conditions and responsible business practices in supply chains. While it is currently voluntary, it is

expected to become a standard requirement in the next 10 years.

While the EU and UK share many goals for sustainability, they have separate systems since the UK left the EU.

- In the EU, most rules come from the Green Deal and strategies like Farm to Fork. These are backed by strict laws, such as the CSDDD, which has an EU-wide impact.
- In the UK, some rules are similar, but the government can make its own laws. The UK is currently working on its own due diligence rules for supply chains, especially concerning deforestation and food safety.

Make sure to ask your buyers about the specific requirements in their country. Stay informed about changes in both the EU and UK if you export to both markets.

Tips:

See CBI's study on the European Green Deal for more information on its implications for exporting to the EU.

Implement 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 demonstrate sustainable sourcing. These guidelines provide technical guidance on cultivating, harvesting, and handling plants to ensure 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 and facilitates sharing this information with potential customers.

Look into digitalising your traceability system. To learn more about the different options, refer to CBI's study with tips on going digital.

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 obtaining traceability in your supply base and what types of information your buyers are looking for.

Payment and delivery terms

European buyers typically require specific payment terms, depending on their relationship with you and their perception of the trade risk. For new business relations, buyers are likely to prefer methods like Letters of Credit or Documentary collections. For ongoing business relationships with regular shipments, buyers may offer to make payment in advance.

Table 3: Overview of payment terms and associated risk levels

Method	Explanation	Risk Level (Exporter)	Risk Level (Buyer)
Letter of Credit (L/C)	A secure payment method where a bank guarantees payment once agreed conditions, such as shipping and documentation, are met. Often used for new trade relationships.	Low	Low
Documentary Collection	The exporter retains control of the goods until the buyer makes payment or accepts a payment contract. This method is less secure than an L/C but provides some protection.	Medium	Medium
Payment in Advance	The buyer pays upfront before receiving the goods, offering the highest security for the exporter but posing risks for the buyer.	Very Low	Very High
Open Account	The exporter ships the goods before receiving payment, which is typically used for long-term, trusted relationships. It also poses the highest risk for the exporter.	Very High	Low

Source: ProFound, 2025

Delivery terms can be negotiated with European buyers. The choice of delivery terms depends on the mode of transport and the nature of the business relationship. The two most commonly used Incoterms (standardised system of delivery terms) for exporting natural food additives for sea transport are Free on Board (FOB) and Cost, Insurance, and Freight (CIF). The most used Incoterms type for air transport is Carriage and Insurance Paid To (CIP).

- Free on Board (FOB): You are responsible for transport and risks until the product is shipped at the agreed port of shipment. From that point, the buyer is responsible for transportation, insurance, customs, tariffs and taxes.
- Cost, Insurance, and Freight (CIF): You are responsible for the costs, insurance, and transport until your product arrives at the agreed destination port. From that point, the buyer is responsible for unloading, customs, tariffs, taxes and insurance.
- Carriage and Insurance Paid To (CIP): You are responsible for delivery, delivery costs, and insurance costs until your product is handed over to the air carrier. When delivered, the buyer takes on all responsibilities.

Tips:

- Read more on payment and delivery terms in CBI's study on Organising Exports for Natural Food Additives.
- Be flexible, but carefully consider what risks you are willing to take when negotiating the payment method.
- Familiarise yourself with all the different Incoterms by reading Using Incoterms.

3. What are the requirements and requested certifications for natural food additives in niche markets?

Certifications drive niche markets for food additives. One key niche market is the organic segment, which requires organic certification. Other niche market segments include fair trade, ethical sourcing, sustainable sourcing, and dietary certifications such as halal and kosher. Recognised authorities must officially certify your products to profit from the premium prices paid for certified products.

See the main certification standards in the table below.

Table 4: Overview of certifications requested by European buyers

Certification	Type of certification	How do you get certified?
EU Organic	Organic	Refer to Regulation (EU) 2018/848 to learn more about the legislative requirements. Access the list of recognised control bodies and control authorities for EU Organic, issued by the EU.
Soil Association	Organic (UK only)	Refer to the Soil Association Certification portal to learn more about how to get certified. Licensees must go further than EU Organic in key areas such as animal welfare, protecting human health, and safeguarding the environment.
FairWild	Social and environmental sustainability (wild-harvested species)	See the approved control bodies and accreditation section on the FairWild website for further information about obtaining certification.

Certification	Type of certification	How do you get certified?
Fair For Life	Social sustainability for both wild and cultivated species	Access the Fair for Life certification process 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	Consult this link to learn how to become a Fairtrade producer. Operators usually undergo a full recertification audit process every 1-2 years.
UEBT	Ethical sourcing and biodiversity	See the UEBT certification bodies section on the UEBT website for further information about obtaining certification.
Rainforest Alliance	Environmental sustainability	Contact an authorised certification body in your country to find out about their fees and process to get certified. Consult the guide for farmers and the guide for companies on how to get certified.
Kosher	Jewish dietary laws	Read these steps to get kosher-certified. There are different certifications, including OU Kosher and KLBD Kosher.
Halal	Islamic dietary laws	Read the Halal certification procedure to learn how to get Halal certified. Select a certifier accredited by the World Halal Council for recognition of your certificate in Europe.

Source: ProFound, 2025

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 some European companies, organic certification is essential, as they only trade organic products, such as Tradin Organic. Other companies, however, offer a range of products, including both conventional and organic ingredients, such as Naturex.

To sell organic additives in Europe, you must meet European rules for producing and labelling organic products. These rules are outlined in EU organic regulation (EU) 2018/848. The main criteria include:

- Farming methods: Ensure that your production methods focus on natural practices, such as crop rotation, natural pest control, and organic seeds and plants.
- Use of chemicals: Do not use synthetic pesticides, fertilisers, or genetically modified organisms (GMOs). Only approved natural substances are allowed.
- Processing practices: Only approved substances and methods, such as organic alcohol or water-based solvents for extraction, are used.
- Animal welfare (if applicable): If your products involve animals, they must meet strict organic welfare standards, like access to outdoor spaces and organic feed.
- Traceability and record-keeping: Establish a system that allows full traceability of your products, from farm to final product, and keep accurate records to prove compliance.
- Regular inspections: Your products must undergo regular inspections by accredited certifying bodies. Only then can you label your products with the EU organic logo.

In the European Union, a food product can have the organic production logo if it has been certified and only if at least 95% of the ingredients are organically produced.

Additionally, not all food additives are permitted in organic products. The allowed additives are listed in the positive list of additives (part A of Annex V).

In the UK, the EU Organic logo is still used, but the Soil Association organic certification is more widely recognised. The requirements for certification under the Soil Association are largely equivalent to the EU Organic standards, but licensees must go further than EU Organic in key areas such as animal welfare, protecting human health, and safeguarding the environment. No system of farming has higher levels of animal welfare than farms working to Soil Association organic standards.

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 the 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 European Commission website. Check the Soil Association website if you plan on exporting to the UK.

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

Kosher and Halal

Although the actual demand for Kosher and Halal products is small, the demand for certification of compliance with 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, so many European buyers 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 separate 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 learn about the products and companies involved in this specific market segment.

Social and environmental standards

European consumers and retailers are 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.