

EU Requirements for Food and Natural Ingredients

IPD guides for success in export



Funded by



Federal Ministry
for Economic Cooperation
and Development

Implemented by



BGA

Federation of German
Wholesale, Foreign Trade
and Services



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Partner of German Business

How to use the “IPD Guide on EU Requirements for Food and Natural Ingredients”



This guide is a resource to help you and your company better understand the topic of “EU Import Requirements”. It is not a comprehensive guide to all import requirements concerns in any industry, but can serve as a guidance for companies in the natural ingredients sector operating internationally.

Please note, that this guide only covers natural ingredients of non-animal origin.

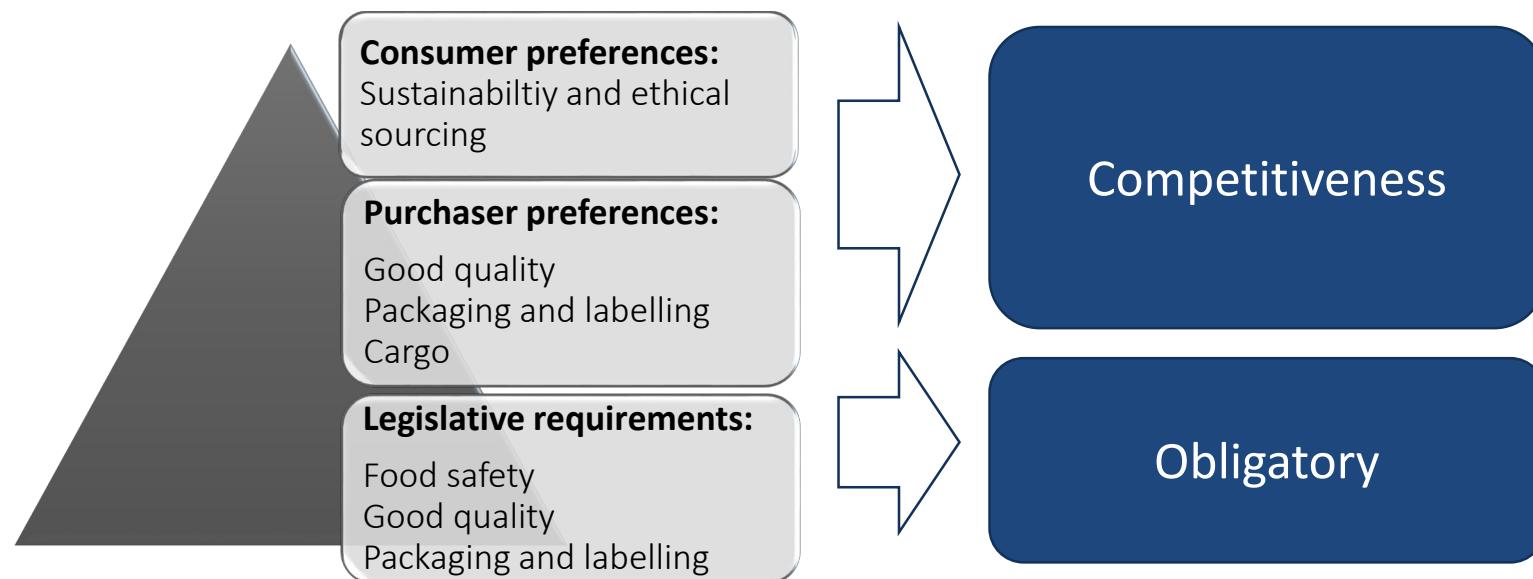
Please note, too, that natural ingredients can also be used for cosmetics and health products. However, these sectors have different requirements. They will not be discussed in this guide.

In this guide, you will find:

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Type of requirement according to priority

In order to export to the EU, you have to comply with specific requirements. However, there are some requirements that are set by the EU legislation and are thus obligatory. Other requirements described in this guide are demand driven preferences of European importers, or market trends and consumer preferences. These are, although not obligatory by law, important, since they can improve your competitiveness and help you find purchasers in the European market.



Legislative requirements

Legislative requirements aim to ensure food safety, by assuring that food products are safe and suitable for human consumption. The general principles and requirements on food safety are laid down in [Regulation \(EC\) No 178/2002](#).

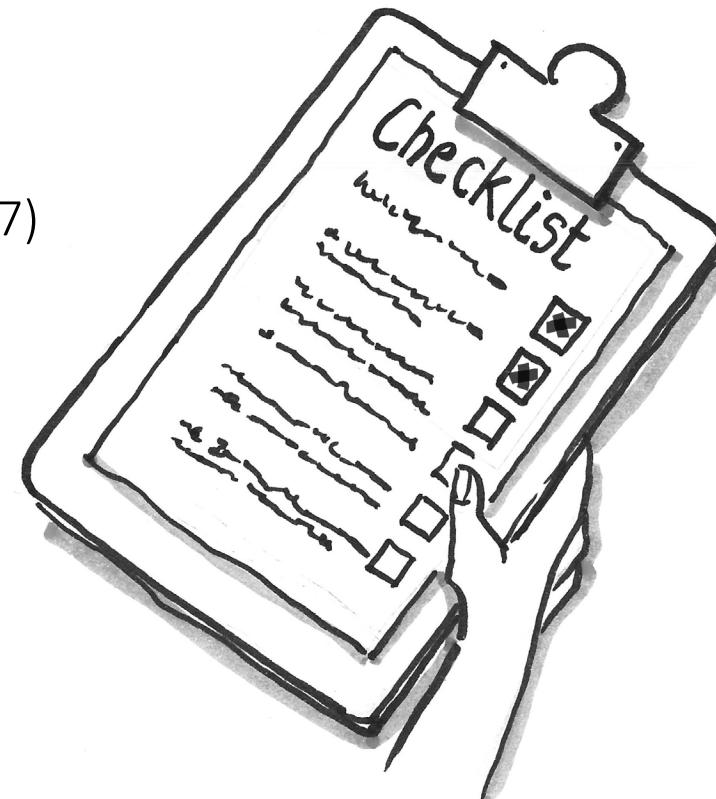
That is why compliance with legislative requirements is the fundamental precondition to export to the EU.



Legislative requirements

For exporters of natural ingredients, the most important legislative requirements concern:

- + Food hygiene (slide 6)
- + Maximum levels of contamination (slide 7)
- + Plant health (slide 9)
- + Traceability (slide 10)



Legislative requirements

Food hygiene

According to the EU Regulation on food hygiene ([Regulation \(EC\) No 852/2004](#)), food business operators should implement procedures based on the HACCP principles (see the [IPD Guide on HACCP](#)).



Legislative requirements

Maximum levels of contamination for crops:

[Regulation \(EC\) 396/2005](#) of the European Commission rules the Maximum Residue Levels (MRL) for pesticides.

You can find MRLs for specific crops in the [EU pesticides database](#).

Apart from MRLs, there also exist restrictions for contaminants:

[\[https://ec.europa.eu/food/safety/chemical_safety/contaminants_en\]\(https://ec.europa.eu/food/safety/chemical_safety/contaminants_en\)](#)

There are many different legislations for food that cannot be covered all within this guide. However, have in mind that there might be specific requirements for different products. For example, there is a specific regulation for Novel Food: [\[https://ec.europa.eu/food/safety/novel_food/legislation_en\]\(https://ec.europa.eu/food/safety/novel_food/legislation_en\)](#)



Legislative requirements

However, European importers sometimes have even stricter MRLs.

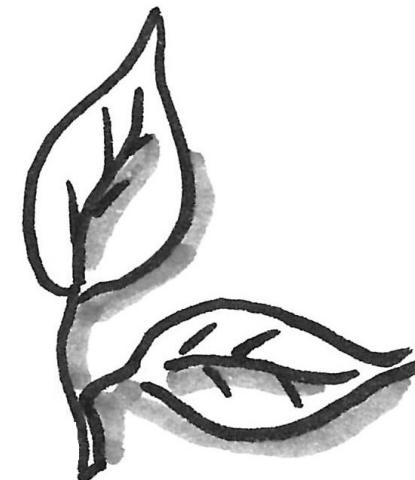
In order to comply with the required MRLs for pesticides, you can implement an [Integrated Pest Management \(IPM\)](#) system, which aims to control agricultural pest by applying growing practices and chemical management.

A way of implementing IPM is getting [GLOBALG.A.P.](#) certified, since it also includes an integrated pest control system. The [GLOBALG.A.P.](#) certification then indicates, that MRLs requirements are met.

Legislative requirements

Plant health

To prevent the introduction and spread of organisms, which are harmful to plants and plant products, some exports of plants and plant products to the EU must be accompanied by a plant-health certificate issued by the relevant competent authorities of the exporting country.



Plants or plant products that need a plant-health certificate are specified in Part B, Annex V of the [Directive 2000/29/EC](#).

In order to get the plant-health certificate, you must comply with requirements of the National Plant Protection Organisation in your country. You can find the respective contact point here:
<https://www.ippc.int/en/countries/all/contactpoints/>.



Legislative requirements

Traceability

Traceability of food is the ability to track food products through the different steps of production.

[Regulation \(EC\) 178/2002](#) includes provisions on traceability, so buyers will expect you to document your suppliers as well as the fertilizers or pesticides that are used in production. Also, the final product must be labeled in order to guarantee traceability in case of a food safety issue.

See the [IPD Guide on Traceability](#).

Refer to the [EU Trade Helpdesk](#) for more information on legal requirements.

Legislative requirements



What happens, if you do not comply with legislative requirements?

In a first step, the product is rejected or withdrawn.

This information is then exchanged between the Member States of the EU via [RASFF – the Rapid Alert System for Food and Feed](#). It enables the sharing of notifications between European countries.

In case of any non-compliance with legislative requirements, the RASFF will notify importers which might cause reputational damage.

When **non-compliance** of supplies from a certain country is frequent, EU authorities can impose **additional controls** from that country.

Products from countries that have shown repeated non-compliance are put on a list included in the Annex of [Commission Implementing Regulation \(EU\) 2019/1793](#).

Visit the [RASFF Portal](#) to see product rejections and causes.

Quality requirements

Since food safety is a big concern, European importers' demands often exceed legal requirements, in order to signalize their customers compliance with food safety and good quality practices.

For product-specific requirements regarding quality, maturity, sizing, presentation and packaging, you may take a look at the [United Nations Economic Commission for Europe \(UNECE\) Standards](#).



Quality requirements

For processed products, often required voluntary standards to guarantee safe food are the [International Featured Standards \(IFS\)](#) and [FSSC 22000](#). Both include schemes for several stakeholders of the supply chain and comply with the [ISO 22000 Standards](#) regarding food safety. Other standards, that are commonly accepted are the standards of the Global Food Safety Initiative (GFSI), the British Retail Consortium (BCR) and GLOBALG.A.P.*

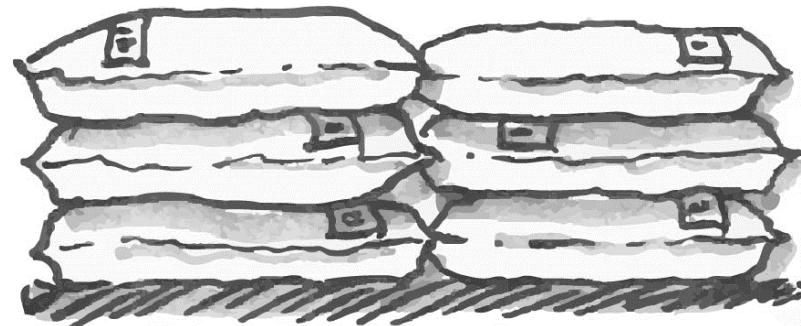
If you are a food processing company, your buyers in Europe may require [IFS Food 6.1](#), which concerns specially companies that pack loose food products or those producing private labels.

* For further information on the different standards, see the IPD Guide on Food Safety Management Systems

Packaging requirements

Packaging not only depends on legislative requirements. Often, customers have specific demands which can be considered as individual business requirements.

However, every importer will demand packaging materials that are:



- + **Adequate for the product:** Use packaging materials that ensure that the products arrive on the destination market as fresh and intact as possible.
- + **Free from damage and clean:** Packaging material may also be a source of contamination. To prevent it, always use clean and proper materials and test them for possible contamination.

Packaging requirements

Packaging is ruled under [Regulation \(EC\) 1935/2004](#) “on materials and articles intended to come into contact with food”, in order to protect human health.

Such materials shall be manufactured in compliance with good manufacturing practice according to [Regulation \(EC\) No 2023/2006](#). This regulation postulates the implementation of a documented quality assurance and control system, so that the materials do not transfer their constituents to food in quantities that exceed the permitted limits.

The traceability of materials and articles shall be ensured at all stages in order to facilitate control and the recall of defective products.

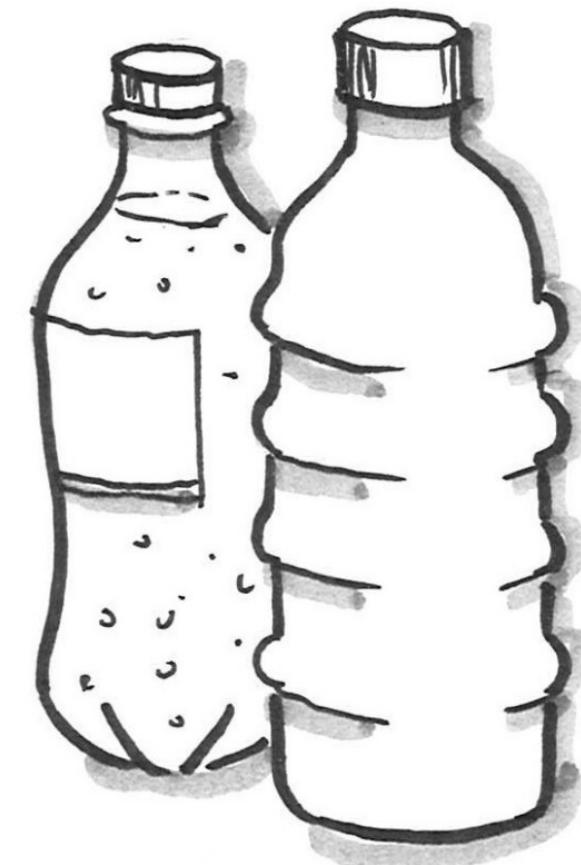
Note that for some substances, additional requirements must be met. These substances are: Plastic materials, active and intelligent materials, recycled plastic materials, ceramics, regenerated cellulose film. You can find more information here:

https://ec.europa.eu/food/safety/chemical_safety/food_contact_materials/legislation_en

Packaging requirements

If you package with plastic, pay attention to:

- + The authorised substances set out in Annex I of [Regulation \(EU\) No 10/2011](#) to be intentionally used in the manufacture of plastic layers in plastic materials and articles
- + The specific migration limits (SML) also set out also in Annex I, specifying the maximum permitted transfer quantities of plastic constituents to foods



Packaging requirements

If you package with pallets, pay attention to:

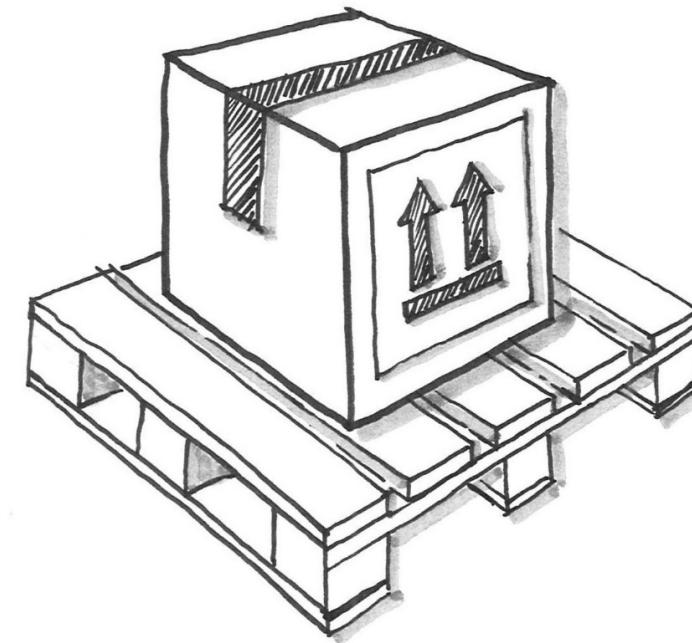
- + The [International Standards for Phytosanitary Measures \(ISPM\) 15](#) (of the [International Plant Protection Convention – IPPC](#)) on international trade with wood packaging material made from raw wood (crates, boxes, packing cases, dunnage, pallets, cable drums and spools/reels)
- + [Regulation \(EU\) 2016/2031](#) on protective measures against plant pests, which is based on the ISPM 15 and sets the requirements for non-EU imports into the EU of wood packaging material

Packaging requirements

According to both regulations, pallets must be:

heat treated or fumigated to kill insects or fungus conforming to EU organic rules. The heat treatments must meet the parameters specified in Annex I of the ISPM 15.

marked with the ISPM15 stamp consisting of 3 codes (country, producer and measure applied) and the IPPC logo.



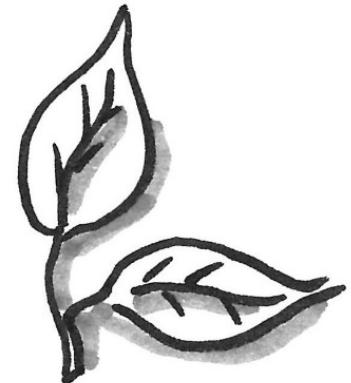
For regulations on other types of materials for food packaging see the section of “Food packaging and containers” on the website of the [Summaries of EU legislation](#).

Packaging requirements

Eco-friendly packaging

Consumers increasingly try to buy products that are packed with less plastic, since plastics made from non-renewable resources such as oil are a threat to sustainability.

Importers may demand alternative packaging materials. Depending on your product, try switching to paper- or glass-based packaging solutions. However, always have in mind possible effects on the quality of your product.



- + Furthermore, the **carbon footprint** of products is becoming a big concern.
- + Try using **efficient packaging** to minimize energy emissions in transportation (e.g. use light and suitable packaging materials that avoid empty spaces; and/or use packaging materials that keep the produce fresh without needing much energy for the cooling system – if necessary).
- + You may also optimize production processes with regard to the environmental impact.

Labelling requirements

The labelling of your products must comply with the requirements of:

- + EU legislation
- + Your purchaser



General labelling requirements are laid down in [Regulation \(EU\) 1169/2011](#).

However, there are specific rules which are applicable to specific products. Find more information here:
https://ec.europa.eu/food/safety/labelling_nutrition/special_groups_food_en

Labelling requirements

According to the general labelling requirements of the EU, the following information must be stated on the product label:



- ✓ The name of the food (legal name). Specific provisions on the name of the food are laid down in [Annex VI](#) to the Regulation;
- ✓ List of ingredients and quantitative indication of ingredients (except for fresh fruit and vegetable and single ingredient foods);
- ✓ Labelling of certain substances or products causing allergies or intolerances;
- ✓ Net quantity;
- ✓ Minimum durability date (Expiration Date, Best-Before Date or Best Quality-Before Date) and date of freezing;
- ✓ Country of origin;
- ✓ Storage conditions;
- ✓ Nutrition declaration.

Labelling requirements

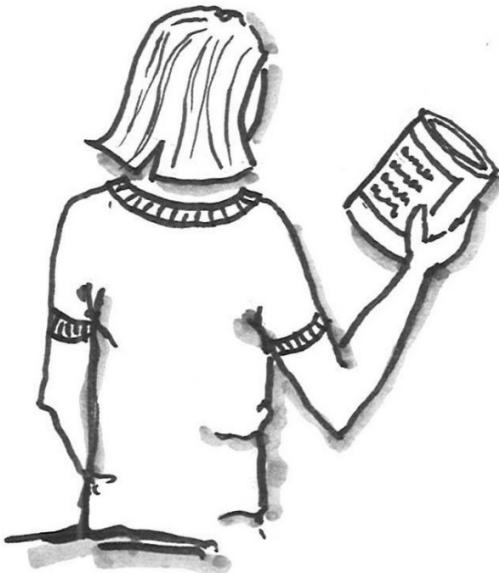
If you export prepacked products, additional information must be included:

- + Name and address of the manufacturer, packer or distributor
- + Lot identification
- + Weight or number of items in the package
- + Size



For further information on the packaging of prepacked products, see the [General Standard for the Labelling of Prepackaged Foods of the Codex Alimentarius of the FAO and WHO.](#)

Labelling requirements



For **packed** products, additional labelling requirements depend on your purchaser:

- + If you sell your produce **directly to German retailers**, your label must be in **German**. Additionally, any **certification or retailer logo** (in case they have a private label) should be displayed on the label.
- + If you work with **suppliers of retailers**, it is commonly the **buyer who provides** the labels.

For additional labelling requirements for categories of products see [the EU Trade Helpdesk](#).

For product-specific labelling requirements see:

https://ec.europa.eu/food/safety/labelling_nutrition/special_groups_food_en

Labelling requirements

Organic label

Your produce can be marketed as organic in the EU only if it complies with the European Union regulation for organic production and labelling ([Council Regulation \(EC\) 834/2007](#) and [Commission Regulation \(EC\) 889/2008](#)). Only then you may apply the European Union's organic logo on your products.

The new [Regulation \(EU\) 2018/848](#) will replace Council Regulation (EC) 834/2007 from 1st January 2022.



See the [IPD Guide on Organic Certification](#) for more information on how to implement an organic production system.

Labelling requirements

For more information on labelling, packaging and quality of your products, please refer to the [Codex Alimentarius Standards](#).



All organic produce must include the EU logo. However, some retailers demand additional certifications which set further rules (e.g. the German [Bio-Siegel](#)). Note that such national logos have a more limited reach whereas the EU logo is highly recognized.

Discuss with your buyers which labels they require.

Cargo requirements

Prior to shipment

Make sure you comply with all the requirements that your customer demands. The best thing to do is to make a checklist, such as the following:

- + Label model was approved by the buyer
- + Send the booking confirmation
- + Mention the order number in all documentation for shipment
- + Check the terms of sale



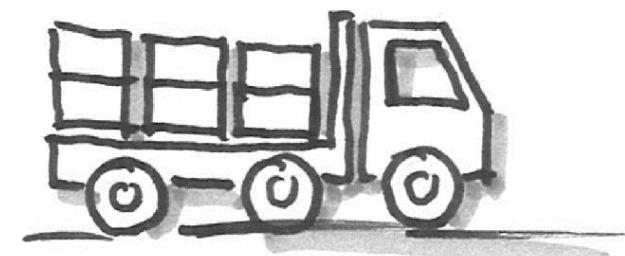
Adapt the checklist to the requirements of your customer.

Cargo requirements

Preparation of the container

Many importers demand that the transport, cleaning and disinfection comply with the [GMP+ standard](#).

- + You can look for specific cleaning requirements of different certification schemes in the [International Database Transport \(for\) Feed \(IDTF\)](#).
- + Furthermore, condensation water can increase the risk of damages.
- + Try placing moisture absorbing material on the cargo or under the container roof, e.g. carton.
- + If your load needs to be palletized, place a cardboard between product and pallet.
- + Make sure that the bags do not overhang the pallets.

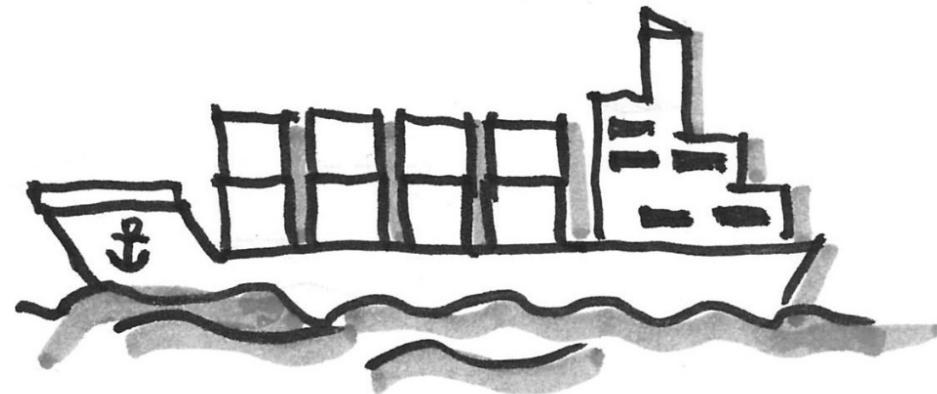


Cargo requirements

Shipping documents

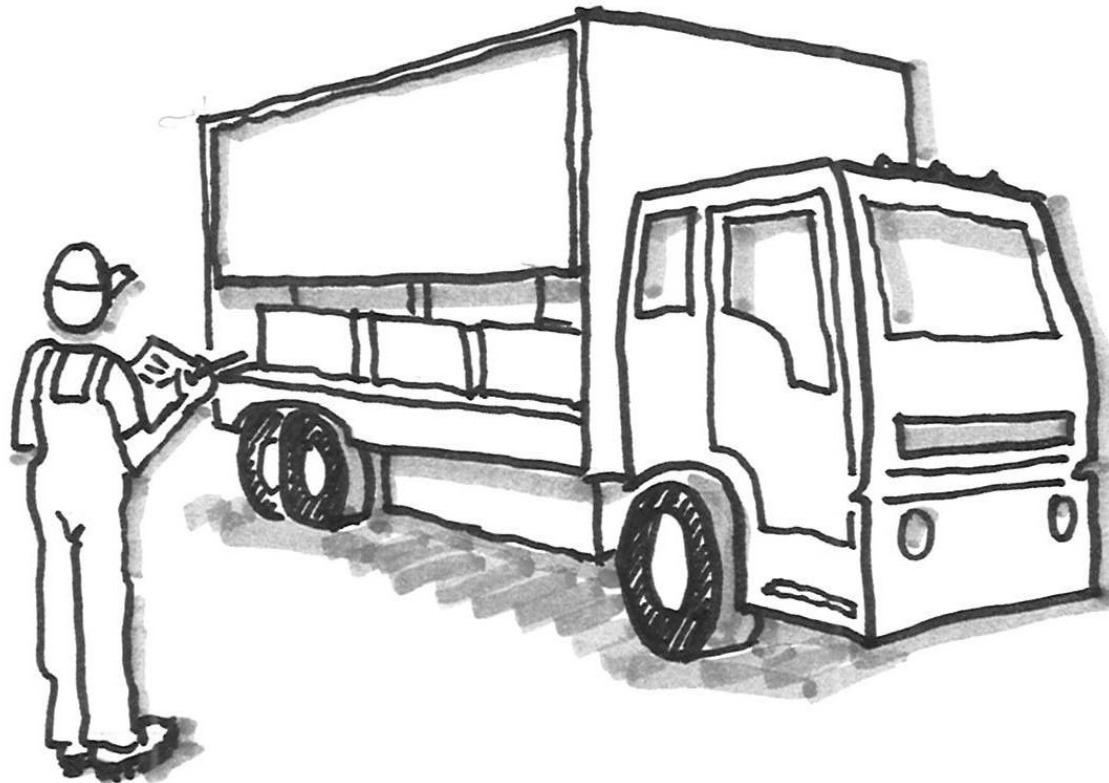
Importers commonly ask for following shipping documents:

- + Bill of Loading or Express Cargo Bill
- + Commercial Invoice that includes:
 - + Lot identification
 - + CN Code
 - + Exact item declaration



Cargo requirements

- + Packing List that includes:
 - + Lot identification
 - + Number of packages / size of packaging
 - + Exact item declaration
 - + Container number
- + Certificate of Origin
- + Phytosanitary Certificate
- + If wooding pallets are used:
 - + Wood Packaging Certificate



Sustainability requirements

Awareness of the environment and working conditions is growing among European consumers. Consequently, importers are demanding more and more evidence from their suppliers about eco-friendly processes and good working conditions among the value chain.

Greater transparency is expected regarding the traceability as well as sustainable and ethical production methods.

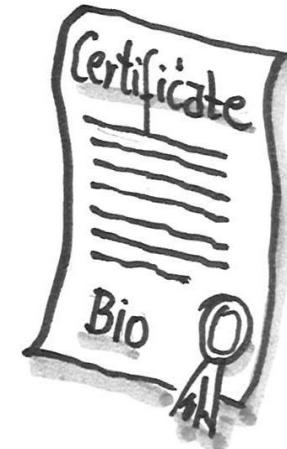
Although not obligatory, participation in sustainability schemes is becoming more important to enter the European market.



Sustainability requirements

Concerns about sustainable production are increasing. Thus, organic certification is becoming more important among some importers. Another frequently required scheme is [GRASP](#), a voluntary GLOBALG.A.P. add-on module that assesses social practices on the farm (workers' health, safety and welfare).

Niche products still do not face as much competition as non-niche products. Thus, retailers are less strict with participation in organic certification or other sustainability schemes. However, it is going to become more common in the next years.



Sustainability requirements

Moreover, awareness is growing among consumers about the impact of consumption on the first stage of the value chain: growers and producers. This is why more and more consumers are buying Fairtrade certified products.

*"Fair Trade is a **trading partnership**, based on dialogue, transparency and respect, that seeks **greater equity** in international trade. It contributes to **sustainable development** by offering **better trading conditions** to, and securing the rights of, marginalized producers and workers – especially in the South.*

*Fair Trade Organizations, backed by consumers, are engaged actively in **supporting producers**, awareness raising and in campaigning for changes in the rules and practice of conventional international trade."*

Source: [The International Fair Trade Charter](#)

Sustainability requirements

Fairtrade schemes focus on enabling decent working conditions for farmers and producers, including prices that cover their average production costs as well as a Fairtrade Premium on the selling price (for investments in the farm or in the community).

The most common Fairtrade schemes in Europe are:

- + [Fairtrade International](#), a product-specific standard, which is certified by the Certification Body [FLOCERT](#).
- + [Fair for Life](#), also a product-specific standard, which is certified by the Certification Body [ECOCERT](#).
- + [WFTO Guarantee System](#), a business-specific standard. That is, it certifies not only a product, but the whole enterprise.



Sustainability requirements

Even before being certified you may want to consider to register your company on the [Supplier Ethical Data Exchange \(Sedex\) platform](#), where you can share information about your production process with potential customers.

This way, you get to show your production process while making it easy for potential buyers to trace their supply chain.



Useful resources

For a list of requirements for your product consult the [EU Export Helpdesk](#), where you can select your specific product code as well as your respective origin and export destination (e.g. Germany).

If you would like to get more information on EU requirements for food, we recommend the following websites and links:

[https://ec.europa.eu/food/sites/food/files/safety/
docs/biosafety_fh_legis_guidance_interpretation_imports.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/biosafety_fh_legis_guidance_interpretation_imports.pdf)

[https://eurlex.europa.eu/summary/chapter/consumers/
0905.html?root=0905%20;%20http://www.jascal.com.my/
988-2/](https://eurlex.europa.eu/summary/chapter/consumers/0905.html?root=0905%20;%20http://www.jascal.com.my/988-2/)

https://ec.europa.eu/food/safety/rasff_en

[https://ec.europa.eu/food/sites/food/files/safety/
docs/ia_ic_guidance_import-requirements.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/ia_ic_guidance_import-requirements.pdf)



Published by

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© November 2020

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