



## PRACTICAL MARKET INSIGHTS INTO YOUR PRODUCT

# Fresh Limes & Clementines in Europe



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This product fact sheet focusses on the export of limes and clementines to Europe. Clementines are a constant product consumed in Europe mainly during the colder winter months and have held their market share in citrus fruits for many years. Imports of fresh limes to the European market grew for a long time, but in recent year apparently also have reached a more constant demand. New producers can enter the market by following trends and ensuring high quality fruits to distinguish their product from competitors.

# 1 Product description

## LIMES VARIETIES

### PERSIAN LIME (LARGE) AND KEY LIME (SMALL)



Source: [The Spruce Eats](#)

## CLEMENTINES



Source: [Agricortese](#)

## CLASSIFICATION OF LIMES AND CLEMENTINES ACCORDING TO THE HARMONIZED SYSTEM (HS)

### LIMES

Limes have a diameter of 42–67mm for the Persian lime and 25–45mm for the Key lime. When ripe, limes are green or slightly turning yellow. The most commonly produced lime varieties for fresh consumption are the:

- + Persian (or Tahiti) lime (*Citrus latifolia*), popular because of its seedless nature.
- + Key (or Mexican) lime (*Citrus aurantifolia*), a smaller variety containing more seeds, making it less popular for fresh consumption.

This study primarily describes the market of the Persian lime, because this is the preferred and dominant variety for the European market.

### CLEMENTINES

The clementine (*Citrus clementina*) is a subspecies of the mandarin and was discovered in Algeria in the late 19<sup>th</sup> century. It has a diameter of 35-55mm, being one of the smallest mandarin species. There are three types of clementines:

- + Seedless clementine.
- + General clementine with a maximum of ten seeds.
- + Monreal clementine with more than ten seeds.

The tree variety, however, does not differ.

HS Code	Description
08 05 50 90 10	Limes, <i>Citrus aurantifolia</i> and <i>Citrus latifolia</i> , fresh.
08 05 22 00 11	Clementines, Monreal, fresh.
08 05 22 00 20	Clementines, other, fresh.

# 2 Product specifications

## 2.1 GENERAL QUALITY STANDARDS

A good source for understanding and defining the quality of limes and clementines is the standard of the United Nations Economic Commission for Europe (UNECE). In the [UNECE Standard FFV 14](#), the limes and clementines – alongside other citrus varieties – are categorized into three classes:

1. “Extra” Class = superior quality.
2. Class I = good quality.
3. Class II = satisfying minimum requirements, but not fitting in the first two classes.

The minimum requirements for citrus fruits express that they must be:

- + Intact;
- + free of bruising and/or extensive healed overcuts;
- + sound (produce affected by rotting or deterioration such as to make it unfit for consumption is excluded);
- + clean, practically free of any visible foreign matter;
- + practically free from pests;
- + free from damage caused by pests affecting the flesh;
- + free of signs of shriveling and dehydration;
- + free of damage caused by low temperature or frost;
- + free of abnormal external moisture;
- + free of any foreign smell and/or taste.

Depending into which class the fruits are classified, slight defects differing from the minimum requirements are allowed.

Citrus fruits must be sufficiently developed in their maturity regarding particularly the juice content and coloring. For limes, the minimum juice content is defined at 42% for Persian limes and 40% for Mexican limes. The fruit should be green, but may show yellow patches up to 30% of its surface for Persian and up to 20% for Mexican limes. Clementines must have a minimum juice content of 40% and their coloring must be typical of the variety on at least one third of the surface of the fruit. In addition, clementines are also defined as being mature when having at least a sugar/acid ratio of 7.5:1.

Citrus fruits are also classified according to their size. For Persian limes, the minimum size of 45mm in diameter applies, while Mexican limes are expected to be at least 25mm in diameter. Clementines must be at least 35mm in diameter to be regarded as mature and eligible according to the UNECE standard.

**TABLE 1: SIZE CODE FOR LIMES**

Size code	Diameter (mm)	
	Persian lime	Mexican lime
1	58 – 67	> 45
2	53 – 62	40.1 – 45
3	48 – 57	35.1 – 40
4	45 – 52	30.1 – 35
5	42 – 49	25 – 30

Source:  
 UNECE Standard FFV 14 on Fresh Citrus Fruits

**TABLE 2: SIZE CODES FOR CLEMENTINES AND OTHER MANDARIN VARIETIES**

Size code	Diameter (mm)	Size code	Diameter (mm)
1-XX	67 – 78	6	43 – 52
1 or 1-X	63 – 74	7	41 – 48
2	58 – 69	8	39 – 46
3	54 – 64	9	37 – 44
4	50 – 60	10	35 – 42

At the very least, limes and clementines should comply with these general quality requirements to enter the European Union. But in Europe, almost all buyers exclusively require Class I as a minimum. Permissible tolerances for Class I citrus fruits include a slight defect in shape or coloring, including slight sunburn, slight skin defects and slight healed defects due to a mechanical cause such as hail damage, rubbing or damage from handling. For clementines, a slight and partial detachment of the peel (or rind) is also allowed. There is a tolerance for the “Extra” Class category of 5%, meaning that this percentage of the badge can be of Class I quality to still be classified as “Extra” Class. The same holds true for Class I, in which 10% of fruits can have a Class II quality.

Europe allows the use of white and yellow beeswax, candelilla wax, carnauba wax and shellac on citrus fruit. However, limes are increasingly used with skin in for example cocktails and beer, so that clients often have specific preferences on fruit preservation or require non-waxed limes. This does not apply for clementines which are regularly waxed to prevent loss of aroma and weight because the washing process removes the natural wax layer. The film of wax sprayed onto the peel only partially seals the pores so that the fruits are still able to respire.

Generally, the condition and development of the fruits must be in a state that they can withstand transportation and handling and arrive in a satisfactory condition at the place of destination.

### TIPS

Read the different, but very similar, internationally recognized standards and apply them:

- + [UNECE Standard FFV 14 on Fresh Citrus Fruits.](#)
- + [OECD International Standards for Fruit and Vegetables – Citrus Fruits.](#)
- + [WHO/FAO's Codex Alimentarius Standard for Limes.](#)
- + [WHO/FAO's Codex Alimentarius Standard for Mexican Limes.](#)

Make sure to read the annexes of the [OECD International Standards for Fruit and Vegetables – Citrus Fruits](#), which explain in French and English all the quality aspects and defects, including pictures. This is very helpful to learn about the quality requirements.

Make sure to discuss the quality and maturity requirements with your buyer. Maintain strict compliance with quality as agreed. Being careless with your standards will lead buyers to raise issues with quality. To avoid miscommunication, send images of your product before shipment.

Maturity must be uniform throughout each parcel!

## 2.2 PACKAGING, LABELLING AND TRANSPORT

### LIMES PACKAGED FOR TRANSPORT



Source: [Eat me](#)

### CLEMENTINES PACKAGED FOR TRANSPORT



Source: [Les Domaines export](#)

Packaging requirements differ by customer and market segment. At the very least, citrus fruits must be packed in such a way as to offer proper protection of the produce during transport. The packaging must be new, clean and of a quality that can prevent damage to the product. Transport containers are refrigerated for citrus fruits.

Citrus fruits are packaged in cardboard boxes or crate boxes for transport. When destined for direct retail purposes the boxes usually contain 4-4.5kg of fruit. In case of limes, the fruits are usually neatly organized in a pattern with the green side up. Clementines might be neatly organized, but are also often packaged disorderly in a box with for example a net above. Boxes for international transport can hold up to 18kg of citrus fruits, with such large boxes destined for clients that repack in nets or trays.

The main concern for the packaging is that the quality of the fruit is preserved during transportation. So, it is important to:

- + Use clean and good quality packaging;
- + protect the cargo from moisture during loading, to avoid mould and spoilage;
- + ensure appropriate temperature, humidity/moisture, and ventilation conditions during transportation;
- + protect the cargo from pests such as beetles, moths, etc.

Furthermore, it is important that the content of each package of fruits is uniform and only contains fruits of the same origin, variety, quality, colouring and size. Visible contents of the package should be a representation of the entire contents.

If the product is organic certified, the organic fruits must remain physically separated from conventional ones at all times, so that the organic product is fully traceable.

Traceability, however, is also important for conventional products. The producer should enable traceability of individual lots. Labeling should include, for example traceability codes. Unless the buyer has indicated otherwise, the English language should be used for labelling.

Labels must include the following:

- + Product name, including name of the variety;
- + country of origin;
- + class (Extra, I or II);
- + batch code;
- + name and address of exporter, packer and/or dispatcher and optionally an identification code;
- + size of fruits (minimum and maximum weight or by count);
- + number of units;
- + net weight in metric units;
- + recommended storage conditions;
- + for organic: name/code of the inspection body and certification number.

**TIPS**

Always discuss specific packaging requirements and preferences with your customers.

If your product is pre-packed for retail, check the additional requirements in the [Codex General Standard for the Labelling of Prepackaged Foods](#) or [Regulation \(EU\) No. 1169/2011](#) on the provision of food information to consumers in Europe.

Please refer to the [German Transport Information Service](#) for further information on storage and transportation conditions for [clementines](#) and [limes](#).

## 3 What is the demand for limes and clementines in Europe?

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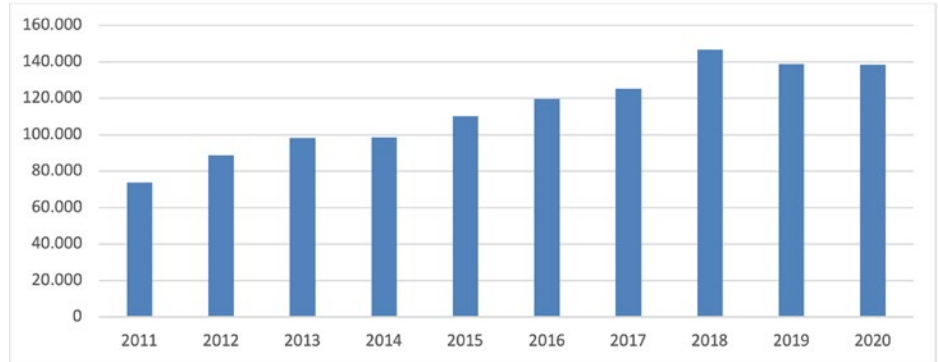
Both limes and clementines are citrus fruits with a steady demand in Europe, but not a very large current upward trend. They are well known and appreciated by the consumers for many years, so the demand is constant. But consumers interest is not particularly rising in the past years. It seems that the markets are more or less saturated as such, while fluctuating from year to year.

### LIMES

The official import figures of the EU include fresh as well as “other” limes – which could be dried, for example. However, it can be assumed that most of these imports consist of fresh limes. Figure 1 shows that limes are increasingly imported over the past decade, the figures have been rising. But since 2018, imports are declining again. It seems that the market is saturated and the number of imported limes into the EU stabilizes at the moment between 130.000 and 145.000 tons a year.

**FIGURE 1:  
IMPORTS FROM NON-EU COUNTRIES  
TO THE EU OF HS CODE “08055090 LIMES  
(CITRUS AURANTIFOLIA,  
CITRUS LATIFOLIA), FRESH AND OTHER”  
OVER THE PAST DECADE (IN TONS).**

Source: [Access2Markets Statistics](#)



Limes are mostly produced outside the EU, so the number of imports also reflects rather well the overall demand for limes inside the European Union.

### CLEMENTINES

Clementines belong to the larger fruit family of “mandarins (including tangerines and satsumas); clementines, wilkings and similar citrus hybrids”. Up until 2017, all those “small citrus” fell under the same HS code; and only after a revision of the HS code system, clementines received their own HS code 080522. Therefore, the development of imports of clementines can only be separated from all other types of small citrus for the past four years. Even though the code 080522 includes also dried clementines, it can be assumed that the actual import of clementines in the dried states is marginal and most of the fruits are imported as fresh fruits.

**FIGURE 2: EUROPEAN IMPORTS OF  
HS CODE “080522 FRESH OR DRIED  
CLEMENTINES, INCL. MONREAL”  
SINCE 2017 (IN TONS).**

Source: [ITC Trade Map](#)

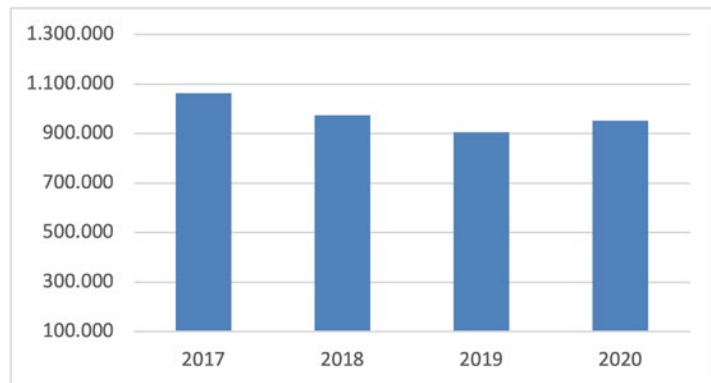


Figure 2 shows that during the past four years, between 905.554 (2019) and 1.062.182 (2017) tons of clementines have been imported into the EU.

At the same time, the southern European countries of Spain, Italy and Greece also produce clementines. Data is combined with the other small citrus mandarins. In 2019, for example, Southern Europe produced 2.740.580 tons of small citrus. It is indicated that around 70% of these fruits belong to the sub-category of clementines. (Sources: [Eurostat – Structure of EU orchards in 2017](#), [FAOSTAT](#)). Around 65% of the European production comes from Spain, 30% from Italy and 5% from Greece.

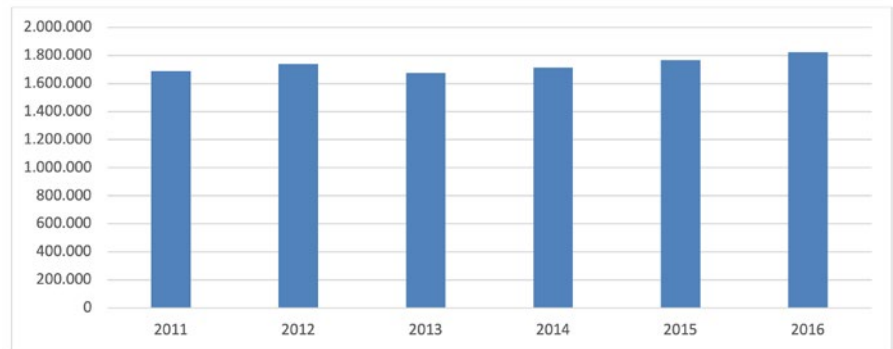
So roughly 1.9 million tons of clementines are produced inside the EU, while the Union imports around 1 million more tons from outside its territory. Out of the consumption in the EU, 2/3 therefore are also produced in the EU, while 1/3 is additionally imported.

Even though the exact number of imports for clementines can be defined only from 2017 onwards, data of the past ten years before 2017 indicates that the market is generally stable. Before 2017, clementines fell under the larger category of HS code “080520 Fresh or dried mandarins, incl. tangerines and satsumas, clementines, wilkings and similar citrus”.

**FIGURE 3:**  
**EUROPEAN IMPORTS OF HS CODE**  
**“080520 FRESH OR DRIED MANDARINS,**  
**INCL. TANGERINES AND SATSUMAS,**  
**CLEMENTINES, WILKINGS AND SIMILAR**  
**CITRUS” 2011-2016 (IN TONS)**

Source: ITC Trade Map

Figure 3 shows that also in this HS code – before the revision of 2017 – there is not a big fluctuation in import numbers.



## 4 Market entry of limes and clementines into Europe

Citrus fruits are a typical retail product. Importers, that supply supermarkets and other major retailers, offer the most stable and largest supply chains. Food service outlets (e.g. catering industries) represent a less important market channel. Fresh limes or clementines require little additional processing at the country of origin or in Europe. Consequently, the value chain is relatively short. Common activities taken on in the country of origin are sorting, washing and packing.

Limes and clementines are mostly sold in supermarket chains. The main market segment for this channel are Class I fruits. High-end markets favour, for example organic fruits, which can be sold for 25% to 45% higher prices than conventional fruits on retail shelves. Organic fruits are especially in demand in German speaking countries and Scandinavia.

Market entry points can differ. Importers play a central role in the distribution of fresh fruits. They are familiar with all the different requirements of end clients and are able to distribute to different market channels, such as wholesalers and supermarkets.

The buyer power of large supermarkets is very strong and buyer requirements are very important. Buyers in Europe tend to prefer long-term partnerships as a means of ensuring the supply and quality of products.

### TIPS

Try not to compete on price alone, but build partnerships with buyers and strive for excellence in product quality and handling instead.

Find trade partners or clients at trade fairs such as [Fruit Logistica](#) or [Fruit Attraction](#).  
 Choose a partner based on the size of your company or strategy.

### 4.1 COMPETITION

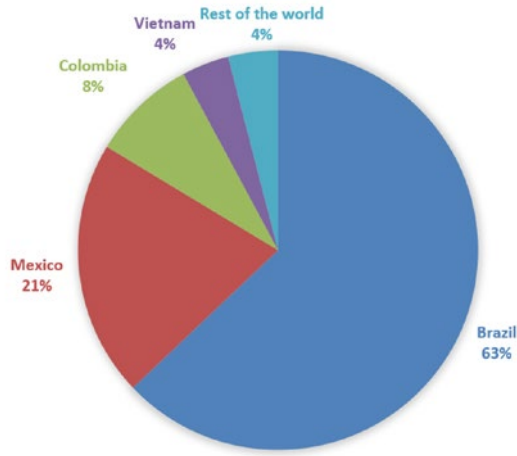
Competition for fruits can arise from several angles. First, there can be a competition from the product side. Second, there can be competition coming from other producing countries.

#### LIMES

Limes – in contrast to clementines – are not a fruit used for snacking. They are mostly used for drinks and cooking. In some of the areas of cooking, limes are in competition with their direct relative, the lemons. Lemons are about the only fruit competing with limes for part of their market share. The [World Citrus Organisation](#) estimates in their [Citrus Global Outlook 2019](#) that only 6% out of the EU market for citrus fruit are held by limes, while 17% of the market are lemons. The largest market shares hold oranges (42%) and “soft” citrus, such as tangerines and clementines (21%) as well as grapefruits (14%).

**FIGURE 4: SHARE OF EU IMPORTS OF LIMES FROM NON-EU COUNTRIES IN 2020**

Source: [Access2Markets Statistics](#)



But regarding imports from countries outside the EU, limes are mostly imported and not produced in very large quantities in Southern Europe. Only 1% of the 6% market size of limes comes from intra-community trade.

Figure 4 shows that by far the largest supplier of limes to the EU is Brazil, followed by Mexico, Colombia and Vietnam. All other non-EU countries combined make up only 4% of imports.

Unlike in the imports of other fresh fruits, limes are not seasonal fruits. Where they are produced, such as in Brazil and Mexico, they can be harvested all year round, with only small fluctuations in harvest amounts. This means, other countries producing limes cannot enter seasonality niches.

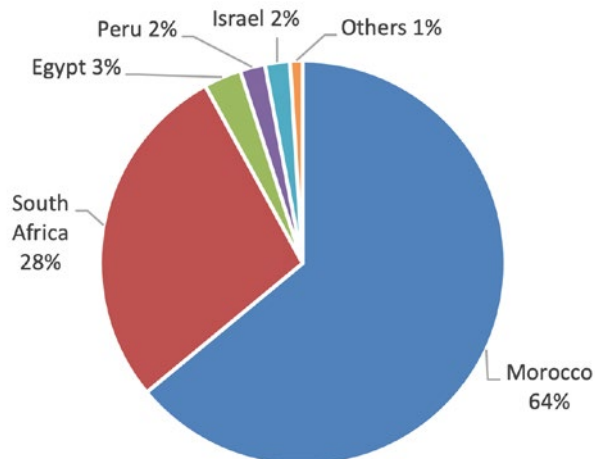
Producers in Brazil and Mexico are competitive, professional, well organized and have good connections to the EU market. To compete with such producers, the quality of the product should be impeccable. Producers from Northern Africa can also analyze transport costs and duration of transport to convince European buyers of a partnership with them.

**CLEMENTINES**

Clementines are usually consumed as a fruit for snacking. Unlike limes, they have some direct competitors within the area of citrus fruits also used for snacking purposes, such as different types of mandarins, tangerines, satsumas, wilkings and even oranges. As cited above, the [World Citrus Organisation](#) estimates in their [Citrus Global Outlook 2019](#) that the largest market shares for citrus fruits are held by oranges (42%), “soft” citrus, such as tangerines and clementines (21%) as well as grapefruits (14%). Trade data for import after 2017 – when the different mandarin products were separated into different HS codes – that roughly 50% of the “soft” citrus imported into the EU are clementines, while the other 50% are the other kinds of mandarin types.

**FIGURE 5: SHARE OF EU IMPORTS OF CLEMENTINES FROM NON-EU COUNTRIES IN 2020**

Source: [Access2Markets Statistics](#)



Of course, citrus fruits for snacking are also in competition with other fruits snacks, such as apples or bananas. However, clementines and other “soft” citrus are a popular product especially in the winter season, having a good reputation in providing vitamin C and calcium.



In contrast to limes or lemons, which will always have a sour taste, the degree of sweetness in clementines – directly related to the cultivation area and its climatic characteristics – is a very important parameter for traders when choosing suppliers.

The import of clementines is therefore also influenced by seasonality. For example, traders traditionally change the source of clementines from Spain to Morocco in January for good fruits with the correct sweet/sour percentage.

For “soft” citrus fruits, it is important to mention that the second largest production country (after China, who mainly produces for its domestic market) is Spain, cultivating around eight million tons of clementines annually. The EU countries are therefore supplied with clementines to a large extent by Spain. Figure 5 shows that, by far, the largest number of clementine imports from outside the EU come from Morocco (64%). South Africa, with a share of 28%, is the main other supplying country, while other countries are marginal, with maybe the exception of Peru, Egypt and Israel who do have a small share between 1% and 2%.

The reasons for these market shares are mostly based on seasonality (see also Table 3). As explained above, Morocco profits from the decline in taste of Spanish clementines early in the year. South Africa, on the other hand, benefits from its location on the Southern Hemisphere, being able to supply clementines during the European summer months.

**TABLE 3: PRODUCTION CALENDAR FOR CLEMENTINES**

Source: IPD Seasonal Calendar, Umina Brothers, Sofruce, HBanna, Peru Citrus, IsraelAgri

Country	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Morocco												
South Africa												
Egypt												
Peru												
Israel												
Spain												

TIP

Analyze your competition wisely and find your company's competitive advantages. It may be related to seasonality, taste or product quality.

## 4.2 ACCESS TO EUROPEAN BUYERS

The best way to get into contact and built trustful relationships is when meeting face-to-face on one of the important trade fairs for the sector.

The largest fair for fresh fruits and vegetables is Fruit Logistica. It takes place every year in February in Berlin, Germany. Fruit Logistica is the leading trade fair for the fresh produce global market. It welcomes over 3000 exhibitors and 75,000 trade visitors each year. The event covers the full spectrum of fresh fruit and vegetable sector: fresh fruit and vegetables, packaging and labelling, transport and logistical systems, produce handling and storage, computer and internet solutions and cultivation systems.

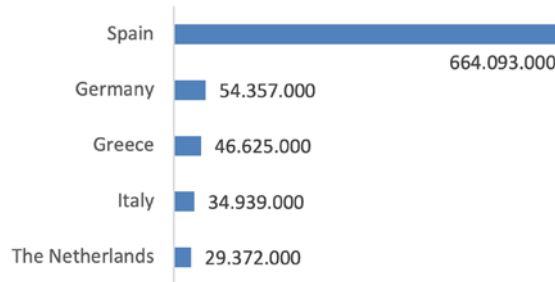
Another interesting trade fair is the Fruit Attraction. It is held in October of each year in Madrid, Spain. There are around 1.600 exhibitors and almost 80,000 trade visitor each year. Fruit Attraction is growing in establishing itself as one of the most efficient fruit and vegetable trading platforms. Southern Europe is developing into an essential hub for the international marketing of fresh produce. The event is divided into two main sectors, the fresh produce sector and the supporting industry.

Importers that specialize in organic products can also be found on the world's largest organic food fair BIOFACH. It takes place every February on the exhibition grounds of the city of Nuremberg, Germany. IFOAM, the global umbrella organization of organic farming associations, has assumed the patronage. Each year, there are around 3,200 exhibitors and about 50,000 visitors at BIOFACH.

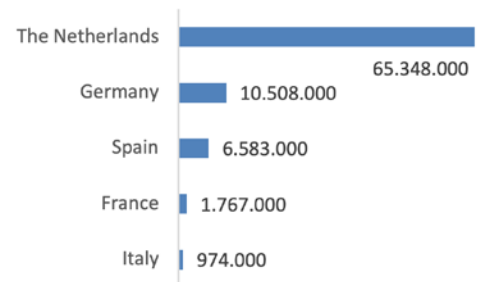
While the largest European countries are also the main consumer countries in terms of volume, importing companies operate often from trade hubs, such as The Netherlands.

The Netherlands, with their long trading tradition, are often the country of import of fresh exotic fruits. This is also true in the case of limes, a fruit which is not much produced inside the EU. However, the situation for clementines is different: Here, Spain is by far the largest import country of the EU. The reason is the different structure in the sector. The Spanish clementine industry players – producers and traders – have well established contacts in this area. To supply their clients with constant product, those actors source the clementines from Morocco and other countries, to complement their own production. The same holds true for the actors in the smaller producing countries of Greece and Italy. The difference of the import sector structure can also be seen in Figures 6 and 7.

**FIGURE 6: LARGEST IMPORT COUNTRIES OF CLEMENTINES IN THE EU 2020 (IN TONS)**



**FIGURE 7: LARGEST IMPORT COUNTRIES OF LIMES IN THE EU 2020 (IN TONS)**



Source: [Access2Markets Statistics](#)

Before Brexit, the United Kingdom was an important importing country for fruits for the EU. However, since the UK exited the EU, trade has become more bureaucratic and transport more insecure. Producers from developing countries should be extra careful when entering business with UK importers at the moment but at the same time, the companies in the UK are also adapting to the new situation.

**TIP** Follow the [CBI tips for doing business with European buyers of fresh fruit and vegetables](#).

## 5 What trends offer opportunities on the European market for limes and clementines?

### 5.1 SUSTAINABILITY

Environmental and social issues are becoming more and more important in the supply of fresh fruit and vegetables in general. This is also the case for limes and clementines. To stay in business, you must work on a sustainable and responsible production.

Marketers of fresh fruits will have to prove to consumers that their products are produced sustainably – this is a tendency that will only become stronger in the long run. As an exporter, you must also be able to prove your good practices and convince importers and retailers in Europe.

Social and environmental standards and certifications, such as [GlobalG.A.P.](#), [GRASP](#), [SMETA](#) and [BSCI](#) often have become a precondition for the import of fresh tropical fruit such as limes or clementines.

A large number of retailers and importers have committed to the [Sustainability Initiative Fruit and Vegetables \(SIFAV\)](#). SIFAV aims for 100% sustainable imports of fruits and vegetables from Africa, Asia and South America and has the objective to reduce the environmental footprint and enable fair living wages.

**TIP**

Get certified and implement standards. See the [SIFAV basket of standards](#) for relevant social and environmental standards, but also try to think creatively and undertake activities to guarantee a sustainable production.

## 5.2 GROWING ORGANIC MARKETS

Consumers in Europe are becoming more aware of health issues and pay more attention to their diets. Fresh fruits have a good reputation for their health benefits. Citrus fruits are especially known and appreciated for the Vitamin C content. All kinds of citrus fruits also serve specific consumer groups that prefer a plant-based diet, such as vegans, vegetarians, and flexitarians. Health is also the reason that the COVID-19 pandemic had little negative effects on the fruit consumption.

Thanks to the increased attention to health and the environment, the interest in organically produced fruits is growing. Organic citrus fruits can be an opportunity for growers that are able to produce according to the strict European guidelines for organic production.

Limes constitute a niche product used mainly as an ingredient or for flavouring. Because the skin of the fruit is used as well, consumers are more likely to want organically produced limes. Therefore, organic limes are more and more in demand. This may present an opportunity for smaller supply countries to compete with the large conventional volumes from Mexico and Brazil.

Clementines, as other fruits, benefit from the general trends of growing organic markets. The organic market is still a niche market but is growing by around 8% annually in Europe. Particularly in the Northern European countries and large markets, such as Germany, all-organic supermarkets and organic food in regular supermarkets are booming. The demand is higher than the supply. For new clementine growers, this niche can be a good opportunity.

**TIP**

Familiarize yourself with the [Organic guidelines and organic farming in Europe](#) in order to decide whether an organic certification is a suitable business endeavor for your company.

## 5.3 PROMOTION, INNOVATION AND BRANDING TO IMPROVE CONSUMER EXPERIENCE

Branding and promoting can contribute to consumers' experience and quality perception. Buyers are also positively reacting to good promotional techniques. Producers should invest into story-telling, good websites and innovational processes to convince buyers to work with them.

Sales of all seedless fruit varieties of clementines are increasing, in anticipation on consumer preferences for convenient, easy-to-use produce. The same applies to seedless limes, which are easier to squeeze and mix. Such features can and should also be well communicated by the producers.

**TIPS**

Create and communicate the story of your product and be consistent with your supply.

Provide your buyers with information on your fruits, which they can use in their promotion towards end-consumers.

See the [CBI trends in fresh fruit and vegetables](#) for more information on trending topics.

# 6 What legal requirements must limes and clementines comply with?

Legal requirements are the minimum requirements which must be met by products marketed in the EU. Products which fail to meet these requirements are not allowed onto the EU market. Food safety is the key issue in EU food legislation, in which the General Food Law is the framework regulation. The legislation also introduces requirements on traceability.

## 6.1 FOOD SAFETY: TRACEABILITY AND CONTROL

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

In the event of repeated non-compliance of specific products originating from particular countries, such products can only be imported under stricter conditions. The EU introduced the European rapid alert system for food (and feed) products (RASFF) as a tool to exchange information on the enforcement of EU food safety legislation.

### TIPS

Read more about sanitary and phytosanitary requirements at the [EU Access-2Markets Portal](#) and pay special attention to the following documents from the European Commission:

- + Import requirements and the new rules on food hygiene and official food controls.
- + [Implementation of certain provisions of Regulation \(EC\) No 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs.](#)

Check if there are any increased levels of controls for your product and country. The list is updated regularly. Check the Regulation periodically for the most recent list.

Refer to an overview of the [RASFF database](#) for notifications on limes or clementines.

## 6.2 PESTICIDE RESIDUES AND CONTAMINANTS

Pesticide residues are one of the crucial issues for fruit and vegetable suppliers. To avoid health and environmental risks, the European Union has set **maximum residue levels (MRLs)** for pesticides and other contaminants, such as heavy metals, in and on food products. Products exceeding the MRLs are withdrawn from the market. For substances that are not yet included in the European regulation, the default MRL of 0.01 mg/kg applies. Note that buyers in several EU Member States, such as Germany, the Netherlands and Austria, use even lower maximum residue levels than those established by European legislation!

### TIPS

Check the [EU pesticides database](#) to find all MRLs and those specific for your product. Search by product or pesticide and the database to find the list of associated MRLs.

Use [Integrated Pest Management \(IPM\)](#) in production to reduce the use of pesticides. IPM is an agricultural pest-control strategy that includes growing practices and chemical management.

Read more about [MRLs on the website of the European Commission](#). Check with your buyers if they require additional requirements on MRLs and pesticide use.

## 6.3 PHYTOSANITARY REGULATIONS

The [European Directive 2019/523](#) requires citrus fruits to go through plant health checks before entering the European Union. The plant health inspection must take place in the country of origin and the shipment must be accompanied by a phytosanitary certificate, guaranteeing that the fruits are:

- + Properly inspected;
- + free from quarantine pests, within the requirements for regulated non-quarantine pests and practically free from other pests;
- + in line with the plant health requirements of the EU, laid down in [Regulation \(EU\) 2019/2072](#).

### TIPS

Learn more about the European phytosanitary rules in [Council Directive 2000/29/EC](#) and the [Implementing Directive 2019/523](#) on the protective measures against the introduction of harmful organisms in the European Union.

Check which (other) fruit and vegetables require a phytosanitary certificate in the lists of [Annex XI](#) and [Annex XII](#) of [Regulation \(EU\) 2019/2072](#).

Check [Annex VI](#) of [Directive 2000/29/EC](#) which provides an example of a phytosanitary certificate on page 170 – 171.

## 6.4 BORDER CONTROLS

Fresh produce which enters the EU is inspected at the border. These controls are carried out to ensure that all foods marketed on the European market are safe and are in compliance with all applicable regulatory requirements. Shipments are checked for documentation, identity, physical plant health and compliance with the European Commission's general and specific import requirements, such as the phytosanitary certificate, issued from the country of origin.

EU countries collect a fee for the documentary, identity and plant health checks, to be paid by the importer or their customs representative. This fee is usually settled with the account of sales and final payment of the buyer.

For importers of fresh fruit and vegetables, the traceability of products is compulsory. To fulfil this obligation, you must document the sources of your product, and be able to hand over proof of origin for all fruits and vegetables. Proof of origin is also necessary for importers to get beneficiary tariffs, if they apply.

### TIPS

Familiarise yourself with the procedures. See the [CBI tips for organising your export of fresh fruits and vegetables to Europe](#). Failure to follow the right procedures could decrease and delay orders, increase costs and result in actions by European enforcement authorities.

Make sure that the accompanying documents (such as a Bill of Lading) correspond exactly to the food products contained in the consignment, including indicated volumes and weight, classes and sizes, number of pallets and boxes.

Check the documents needed for customs clearance in the EU [Access2Markets](#) tool.

Check out the [Factsheet on food traceability of the European Commission](#).

## 6.5 FOOD CONTACT MATERIALS

The European Union has laid down rules for materials and articles coming into contact with food (including for example packaging) in order to prevent any unacceptable change in the composition of the foodstuffs and to protect human health. These rules are laid down in the framework legislation [Regulation \(EC\) 1935/2004](#).

# 7 What additional requirements do buyers often have?

European buyers often have specific requirements, depending on their sales channels and product segments. Common buyer requirements include GLOBALG.A.P. certification and compliance with social and environmental standards.

## 7.1 GLOBAL GOOD AGRICULTURAL PRACTICE (GLOBALG.A.P.)



The most important non-legislative requirement is that of good agricultural practices, which most EU retailers demand compliance with. GLOBALG.A.P. is a private global standard and certification for agricultural products. This pre-farmgate standard covers the whole agricultural production process from before the plant is in the ground to the unprocessed product. GLOBALG.A.P. focuses on food safety as well as the environment, labour conditions and product quality. It has become a minimum standard for most European supermarkets.

As social sustainability became more important, GLOBALG.A.P. added a voluntary assessment that can be conducted at the same time as a GLOBALG.A.P. audit to their certification, which is called GLOBALG.A.P. Risk Assessment on Social Practice (GRASP). Its main objective is to raise awareness on social practice in primary production. The outcome of the assessment does not affect the GLOBALG.A.P. certification but serves as additional information to supply chain partners. European buyers are increasingly asking for GRASP certification.

### TIPS

GLOBALG.A.P. is a certification which has almost become mandatory for the EU market. Make sure to become informed about it!

If you need to prepare for a certification and are not sure how you can go about it, look for a certified GLOBALG.A.P. Farm Assurer, a consultant knowledgeable about the certification.

## 7.2 SUSTAINABILITY AND SOCIAL COMPLIANCE

There is growing attention to the social and environmental conditions in the producing areas. Most European buyers have a code of conduct, which they expect their suppliers to comply with. Although product quality is the top priority, social compliance becomes more and more important.

Initiatives in and attention to Corporate Social Responsibility (CSR) vary across the various parts of Europe. In the Eastern part of Europe, fewer buyers require strict social compliance, while there are multinational buyers in Western Europe which have their own compliance program. Examples include Unilever's Sustainable Agriculture Code and Tesco's Nurture accreditation.

The best way to comply with such buyer requirements is through adopting social and environmental standards or joining respective buyer initiatives, such as:

- + Sedex Members Ethical Trade Audit (SMETA).
- + Business Social Compliance Initiative (BSCI).
- + Sustainability Initiative for Fruit and Vegetables (SIFAV).
- + Ethical Trading Initiative (ETI).
- + ISO 26000 for social responsibility and/or ISO 14001 for environmental management.

Fairtrade labels are not (yet) on the top of the list of buyers because of their complex requirements and high costs. Fairtrade is most often used for the largest product categories such as bananas. SMETA and GRASP are more accessible for most exporters and are gaining in importance.

**TIPS**

Implement at least one environmental and one social standard. See the [Basket of standards of the Sustainable Initiative for Fruit and Vegetables \(SIFAV\)](#).

Explore new standards. Consult the [ITC standards map](#) for the different labels and to learn about differences between social and environmental standards.

For more information on Fairtrade, check the [Fairtrade International and FLO-Cert Certification Requirements](#) and [fairtrade minimum prices](#).

Measure your environmental impact and check your company's current performance; for example, by doing an [amfori BEPI self-assessment](#) on the amfori website.

## 7.3 FOOD SAFETY MANAGEMENT SYSTEMS

Even though food safety management systems are much more important in the trade of processed food items, some buyers might require compliance also for their fresh fruit and vegetable partners.

Food hygiene is based on [Hazard Analysis Critical Control Points \(HACCP\)](#) method, an internationally recognized method of identifying and managing food safety related risk. The adoption of standards which go beyond HACCP (and which specific standard) will depend on the profile of your buyer; usually large retailers are more demanding and might require compliance with one of the following:

- + [International Featured Standards \(IFS\)-Food](#): corresponds to ISO 9001, but with a focus on food safety, HACCP, hygiene, the manufacturing process and business surroundings. The IFS is a quality and safety standard published by the union of German supermarket chains, HDE (Hauptverband des Deutschen Einzelhandels).
- + [British Retail Consortium \(BRCGS\)](#): private institution which promotes private standards, which contain more extensive rules on Good Manufacturing Practices (GMP) than HACCP, e.g. regarding organisation and communication.

All the mentioned management systems are recognised by the [Global Food Safety Initiative \(GFSI\)](#), which means that any of them should be accepted by your buyer. However, in practice some buyers still have preferences for one specific management system.

**TIP**

Stay in close contact with the market and potential buyers to find out whether one of these standards or certifications could become interesting for you.

## 7.4 COMPANY PERFORMANCE AND RELIABILITY

Complying with the food safety requirements, quality standards and certifications is a precondition to market fresh products in Europe, but it is still not a guarantee for success. Soft skills and company performance are also important. Buyers look for trust and reliability and flawless communication. Such skills are just as important as your product and certifications.

Some of the most important things in the fresh trade are a timely delivery, proactive communication and commitment to agreements. However, good conduct works both ways, so be aware of buyers that have a poor reputation or only show a short-term interest. In this fast-moving and perishable market, sudden decisions are taken, such as “dumping” your products at very low prices, when the quality starts to deteriorate or when the demand slows down. European buyers are not eager to accept their loss and often rather settle by claiming a quality issue. It is crucial that you can deal professionally with claims, whether they are justified or not.

**TIPS**

Make sure that you are well organized as a company. Maintain good logistical planning, document your shipments (including proof of quality), respond to your emails within a day and be professional in every aspect of the business.

Do not put your product in consignment with a buyer which you do not know. Consignment is becoming less of a standard practice and it increases your risks significantly.

Establish and confirm agreements with your buyer on important topics such as delivery and payment terms, product specifications and certifications.

Follow the [CBI tips for doing business with European buyers of fresh fruit and vegetables](#).

## 7.5 REQUIREMENTS FOR NICHE MARKETS

### DIFFERENT ORGANIC CERTIFICATION LOGOS



Additional requirements for niche markets (subset of a market that focuses on a specific segment) are becoming increasingly important. Those requirements are usually even mandatory to enter the respective niche market.

### ORGANIC CERTIFIED PRODUCTS

More and more consumers in Europe prefer organic fruit and vegetables because of their natural and sustainable production methods and their connection to a healthy diet. In countries such as Italy, Ireland, France, Germany and Sweden, organic fruit and vegetables represent around a fifth of the total organic demand.

In order for a company to market their product as “organic” in the European market, it must comply with the EU Regulation ([Council Regulation \(EC\) No 834/2007](#) and [Commission Regulation \(EC\) No 889/2008 \(OJ L-250 18/09/2008\)](#) for organic production and labelling – which is a legal requirement for all organic products. Organic products must be grown using organic production methods which are laid down in the legislation. Growing and processing facilities must be audited by an accredited certifier before you may put the EU organic logo onto your products.

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

Commission Regulation (EC) No 1235/2008 of 8 December 2008 laying down detailed rules for implementation of Council Regulation (EC) No 834/2007 and its latest amendments, as regards the arrangements for imports of organic products from third countries, can be found on the [EUR-Lex website](#).

In the organic food market, there are also some certifications which go much further than the EU regulation. Those standards might become important in case a small niche within the organic market is targeted. The most common of these standards are [Demeter](#) or [Naturland](#) organic certification.

All organic products imported into the EU must have the appropriate electronic certificate of inspection (e-COI). These certificates are managed through the [Trade Control and Expert System \(TRACES\)](#). If you do not have an electronic certificate of inspection, your products will not be released from their port of arrival in the European Union.



**TIPS**

Investigate the possibilities for organic certification, including the opportunities and costs involved in the process.

Consider organic fruits as a plus, not as a must. Remember that implementing organic production and becoming certified can be expensive.

For information on organic certification in Europe, visit the website of [organic farming](#) in the European Union, which also contains guidelines concerning imports of organic products. Also consult the [International Federation of Organic Agriculture Movements \(IFOAM\)](#) website for information on certification standards.

Make sure you become familiar with the [Trade Control and Expert System \(TRACES\)](#) before your first organic exports in order to avoid losses.

**FAIRTRADE PRODUCTS**

Fairtrade labels are niche requirements that can distinguish your product from the masses and attract the more conscious consumers. These certification labels are consumer-focused and are the most applicable to products from smallholder farms and main fruit and vegetable categories.

Fairtrade International is the leading standard-setting and certification organization for Fairtrade. Products which carry the Fairtrade label indicate that producers are paid a fairtrade minimum price. Other fair trade standards available in the European market are Fair Trade Ecocert and [Fair for Life](#). Fair Trade Ecocert provides for guaranteed minimum prices, producer support and good agricultural practices; this standard requires an organic certification. Fair for Life has a similar proposition, and is a standard for companies which demonstrate decent working conditions and commit to fair sourcing and responsibilities towards their primary producers. Organic certification is not compulsory for Fair for Life.

**TIP**

Before engaging in a Fairtrade certification program, make sure to check (in consultation with your potential buyer) that this label has sufficient demand in your target market and whether it will be cost beneficial for you.

## SOURCES

CBI – Exporting fresh limes to Europe (2018):  
[www.cbi.eu/market-information/fresh-fruit-vegetables/limes](http://www.cbi.eu/market-information/fresh-fruit-vegetables/limes)

CBI – What requirements must fresh fruit or vegetables comply with to be allowed on the European market (2021):  
[www.cbi.eu/market-information/fresh-fruit-vegetables/buyer-requirements](http://www.cbi.eu/market-information/fresh-fruit-vegetables/buyer-requirements)

CBI – What trends offer opportunities or pose threats on the European fresh fruit and vegetables market (2020):  
[www.cbi.eu/market-information/fresh-fruit-vegetables/trends](http://www.cbi.eu/market-information/fresh-fruit-vegetables/trends)

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