



# EU Buyer Requirements for natural colours, flavours and thickeners

Buyer requirements can be divided into (1) *musts*, requirements you must meet in order to enter the market, such as legal requirements, (2) *common* requirements, which are those most of your competitors have already implemented, in other words, the ones you need to comply with in order to keep up with the market, and (3) *niche* market requirements for specific segments.



## Legal requirements are a must – food safety and ensuring additives and flavouring are allowed

Here you can find requirements you must meet when marketing your products in the EU. Pay attention to the indications of which materials / products are concerned per requirement described.

The following 'musts' apply to the products and uses listed here:

- **Food safety** – applicable to all products

- **Additives and flavourings** – natural colours, flavours and thickeners allowed to be used in food products
- **Contamination** –chemical and physical contamination for food products
- **Food contact materials** - for all pre-packed food products

### **Food safety: Traceability, hygiene and control**

Food safety is a key issue in EU food legislation. The [General Food Law](#) is the legislative framework regulation for food safety in the EU. To guarantee food safety and to allow appropriate action in cases of unsafe food, food products must be traceable throughout the entire supply chain and risks of contamination must be limited. An important aspect to control food safety hazards is defining critical control points ([HACCP](#)) by implementing food management principles. Another important aspect is subjecting food products to official controls. Products that are not considered safe will be denied access to the EU. For example, guar gum from India was restricted due to risk of dioxin contamination. These products can now only be imported under [stricter conditions](#) including having to be accompanied with a health certificate and a analytical test report.

#### *Control of food imported to the EU*

Your products will be subjected to official controls. These controls are carried out to ensure that all foods marketed in the EU market are safe, i.e. in compliance with the requirements applicable to them. In the event of repeated non-compliance of specific products originating from particular countries, the EU can decide that controls will be carried out on an increased level or lay down emergency measures. Controls can be carried out at all stages of import and marketing in the EU. However, most checks are done at the points of entry in the EU.

### **Permitted for additives and flavours**

It is crucial that the natural colours, flavours or thickeners you supply are permitted to be used in food products in the EU. Specific legislation for [additives](#) (e.g. colours, thickeners) and [flavourings](#) list what E-numbers or substances are allowed to be used. Many of the food products rejected by custom authorities or buyers have undeclared, unauthorised or too high limits of extraneous materials (i.e. colours, flavours, thickeners)

### **Avoid contamination to ensure food safety**

Contaminants are substances that may be present as a result of the various stages of its growing, processing, packaging, transport or storage. Contamination is mainly physical (plastic residues, metal, dirt) or chemical contamination (pesticides). The EU has set maximum residue levels (MRLs) for pesticides in and on food products. Products containing more pesticides than allowed will be withdrawn from the EU market. In contrast to fresh and

### **Considerations for action**

- Search in the [EU's Rapid Alert System for Food and Feed \(RASFF\) database](#) to see examples of withdrawals from the market and the reasons behind these withdrawals.
- EU buyers will often ask buyers to implement a food (safety) management system based on HACCP-principles (see under *Common requirements*).
- Read more about HACCP and health control in the [EU Export Helpdesk](#)

- To help you answer key questions about health control refer to the [guidance document](#) of the EU.
- Read more about [health control](#) in the EU Export Helpdesk.

- E-numbers indicate approval by the EU. To obtain an E-number the additive must have been fully evaluated for safety by the competent food safety authorities in the EU (EFCH). For an overview of E-numbers refer to the Annex of [Regulation 1333/2008](#) (see under *Consolidated versions*).

- To find out the MRLs that are relevant for your products, you can use the EU [MRL database](#) in which all harmonised MRLs can be found. You can search on your product or pesticide used and the database shows the list of the MRLs associated to your product or pesticide.
- A good way to reduce the amount of pesticides, is applying integrated pest management (IPM) which is an agricultural

dried products microbiological (e.g. bacteria) and mycotoxic contamination (e.g. moulds) is not a large issue for most natural colourants, flavourings and thickeners.

#### **Food contact materials**

For consumer packaging materials that comes in contact with food (e.g. cans, jars) that come into contact with food specific [health control provisions](#) apply. Food contact materials such made from for example (recycled) plastic and ceramic must be manufactured so that they do not transfer constituents to food in quantities that could endanger human health, change the composition of the food in an unacceptable way or deteriorate the taste and odour of foodstuffs. Common restricted substances are vinyl chloride monomer N- nitrosamines, N-nitrosatable BADGE, NOGE, BFDGE and heavy metals.

#### **Full overview of requirements for natural colours, flavours and thickeners:**

For a list of requirements consult the [EU Export Helpdesk](#) where you can select your specific product code under chapter 13 and 33.

pest control strategy that uses complementary strategies including growing practices and chemical management.

- Read more about [MRLs](#) in the EU Export Helpdesk.
- The EU legislation on food contact materials is quite extensive and it is not easy to prove to your EU importer that your product complies with all requirements. Therefore, EU importers of food products will require documentation on toxicology and risk assessment of chemical migration from food contact materials and/or declarations of compliance.

### **Common requirements: Buyers want food safety managed, sustainability increasingly popular**

#### **Food Safety Certification as a guarantee**

As food safety is a top priority in all EU food sectors, you can expect many players to request extra guarantees from you in form of certification. Many EU buyers (e.g. traders, food processors) require the implementation of a (HACCP based) food safety management system. The most important food safety management system in the EU are [BRC](#), [IFS](#), [FSSC22000](#) and [SQF](#). Different buyers may have different preferences for a certain management system, so before considering certification against one of these standards, it is advised to check which one is preferred (e.g. UK retailers often require BRC and IFS is more commonly required on the mainland). All the mentioned management systems are recognised by the [Global Food Safety Initiative \(GFSI\)](#), which means that any of them should be accepted by several major retailers. However, in practice some buyers still have preferences for one specific management system.

#### **Corporate responsibility**

EU buyers (especially those in western and northern EU countries) pay more and more attention to their corporate responsibilities regarding the social and environmental impact of their business. This also affects you as a supplier. Common requirements are the signing of a suppliers' code of conduct in which you declare that you do your business in a

#### **Considerations for action**

- EU market entry preparation is more likely to include implementing a food safety management system than not, and it is therefore important to familiarise yourself with them.
- When you plan to target one or more markets, check which specific food safety management systems are most commonly requested. In any case choose for a management system that is GFSI approved.
- Read more on the different Food Safety Management Systems at the [Standards Map](#).
- In case you are targeting the UK market familiarise yourself with the [ETI base code](#) to check what [ETI members](#) require from their suppliers.
- When targeting other EU markets it might be interesting to assess your company's current performance by doing a self-assessment, which you can find on the [BSCI](#)

responsible way, meaning that you (and your suppliers) respect local environmental and labour laws, stay away from corruption etc. Furthermore importers may also participate in initiatives such as the [Ethical Trading Initiative](#) (ETI) in the UK, or the [Business Social Compliance Initiative](#) (less present in the UK). These initiatives focus on improving social conditions in their members' supply chains. This implies that you, as a supplier, are also required to act in compliance with their principles.

- [website](#).
- Be aware that many of the environmental and social sustainability issues take place at farm level (which may not be a part of your company). To test to what extent your farmers are sustainable you could ask them to fill in the [Farmer Self Assessment](#) by the Sustainable Agriculture Initiative.
- Implementing a management system such as [ISO14000](#) (environmental aspects), OHSAS 18001 (occupational health and safety) or [SA 8000](#) (social conditions) is away to address sustainability and possibly gain a competitive advantage. Research with your buyer whether this is appreciated.

### Niche requirement: certified sustainable products

#### Sustainable certified products

Organic natural colours, flavours and thickeners are produced and processed by natural techniques (e.g. crops rotation, biological crop protection, green manure, compost). The market for organic products has grown strongly in recent years but is still a niche market. To market organic food products in the EU, they must be grown using organic production methods which are laid down in [EU legislation](#) and the growing and processing facilities must be audited by an accredited certifier, before you may put the EU organic logo on your products, as well as the logo of the standard holder (e.g. [Soil Association](#) in the UK, [Naturland](#) in Germany). While sustainability is gaining ground, the actual use of organic certification is still a niche in this sector. There are also some natural colours, flavours and thickeners on the markets that are certified according to social standards such as [Fair Trade](#) and [Fairwild](#). This is an even smaller market.

#### Considerations for action

- Organic colours, flavours and thickeners will only be used in the food processing industry if the end-product manufactured is an organic product. Therefore always check with your buyers if they require certification.
- Implementing organic production and becoming certified can be expensive. In the current market the return on investment may not be high. On the other hand it can increase yields and improve quality.
- Check the Soil Association standard for [Food and drink](#) to get an idea of the requirements of organic production.
- Consult the [Standards Map database](#) for the different organic labels and standards.

This document was compiled for CBI by CREM B.V.

Disclaimer CBI market information tools: <http://www.cbi.eu/disclaimer>