



EU Buyer Requirements for processed fruit and vegetables and edible nuts

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 informing consumers correctly

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 and health control** – applicable to all food products
- **Contamination** – applicable to all food products
- **Composition** – for all food products, specific requirements for fruit juices and fruit jams, jellies, marmalade and sweetened chestnut puree apply
- **Labelling** – for all pre-packed food products, specific requirements for fruit juices and fruit jams, jellies, marmalade and sweetened chestnut puree apply
- **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.

Control of food imported to the EU

In the event of repeated non-compliance of specific products originating from particular countries can only be imported under [stricter conditions](#) such as having to be accompanied with a health certificate and analytical test report. Products from countries that have shown repeated non-compliance are put on a list included in the Annex of [Regulation \(EC\) 669/2009](#). At the moment frozen and dried fruits and vegetables (pesticide residues) and groundnuts (aflatoxin) from different countries (e.g. Brazil, India, Ghana, Thailand) are on the list.

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. The different forms of contamination are:

- a) Nitrate: a maximum level of 2,000 mg NO₃/kg applies for frozen spinach (see section 1 of Annex of [Regulation \(EC\) No 1881/2006](#))
- b) Aflatoxin: limits have been set for aflatoxins B1, B2, G1 and G2 in most edible nuts and dried fruit (see section 2 of Annex of Regulation (EC) No 1881/2006)
- c) Ochratoxin A: applies to dried vine fruit (currants, raisins and sultanas) and grape

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.
- Check if there are any increased levels of controls for your product and country. The list is updated regularly. Check the website of [EUR-Lex](#) for the most recent list (see under *Amended by*).
- Read more about [health control](#) in the EU Export Helpdesk.

- Understand better growing, drying, processing and storage practices and discuss them with your suppliers. For an example refer to the [good manufacturing practices for Tree Nuts and Dried Fruit Processing Plants in Afghanistan](#).
- For information on safe storage and transport of processed fruit and vegetables and edible nuts go to the [website](#) of the Transport Information Service.
- Check the European Commission's factsheet on food contaminants "[Managing food contaminants: how the EU ensures that our food is safe](#)".
- Read more about [contaminants in the EU](#)

- juice (see section 2 of Annex of Regulation (EC) No 1881/2006). OTA is hard to prevent as it has a lot to do with climatic conditions.
- d) Patulin: for different types of fruit juices limits between 10 and 50 µg/kg apply (see section 2 of Regulation (EC) No 1881/2006).
 - e) Heavy metals: there are restrictions for lead (fruit, fruit juices, various kinds of vegetables), cadmium (fruit and vegetables) and tin (canned food and beverages) (see section 3 of Annex of Regulation (EC) No 1881/2006)
 - f) Microbiological: according to [EU legislation](#) salmonella is an important source of contamination in unpasteurised fruit and vegetable juices and cannot be present. For E-coli of the 5 samples only two can have a value between 100 cfu/g and 1 000 cfu/g. For other processed fruit and vegetables and edible nuts there are no EU requirements. Food safety authorities however can withdraw imported food products from the market or prevent them from entering the EU when salmonella is found present.
 - g) 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.
 - h) Foreign matter: contamination by foreign matter like plastic and insects are a threat when food safety procedures are not carefully followed.

Product composition

Product can be rejected by buyers and EU custom authorities in case they have undeclared, unauthorised or too high limits of extraneous materials. There is specific legislation for [additives](#) (e.g. colours, thickeners) and [flavourings](#) that list what E-numbers and substances are allowed to be used. In case you want to add vitamins you will have to know which [vitamins](#) (see Annex I) and sources, vitamin formulations and mineral substances are allowed (see Annex II).

Product specific legislation regarding composition applies to [fruit juices](#) and [fruit jams, jellies, marmalade and sweetened chestnut pureé](#). The Directives indicate which raw materials and additives may be used.

Labelling

In case you are supplying consumer labelled product (in for example cans, jars or boxes) you will have to take into account labelling requirements laid down in [Directive 2001/13/EC](#). This should inform consumers about composition, manufacturer, storage methods and preparation. In addition, for [fruit juices](#) and [fruit jams, jellies, marmalade and sweetened](#)

Export Helpdesk

- Irradiation is a way to combat microbiological contamination but this is not allowed by [EU legislation](#) for processed fruit and vegetables and edible nuts.
- To find out the MRLs that are relevant for your products, you can use the EU [MRLdatabase](#) 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. Read more about [MRLs](#) in the EU Export Helpdesk.
- A good way to reduce the amount of pesticides, is applying integrated pest management (IPM) which is an agricultural pest control strategy that uses complementary strategies including growing practices and chemical management.

- Refer to Buyer Requirement module on natural colour, thickeners and flavours for more information.
- 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 (EFSA). For an overview of E-numbers refer to the Annex of [Regulation 1333/2008](#) (see under *Consolidated versions*).

- In December 2014 [EU Regulation 1169/2011](#) will go into effect. This new labelling legislation will considerably change current legislation. For example, allergens will have to be highlighted in the list of ingredients and requirements on information on allergens will also cover non pre-packed foods including those sold in restaurants and

[chestnut pureé](#) specific provisions are adopted in order to improve consumer information. For [quick frozen](#) food specific labeling and quality requirements apply.

Nutrition and health claims

Nutrition and health claims suggest or indicate that a food has a beneficial characteristic. They cannot be misleading. Therefore, only EU approved nutrition and health claims can be made. If new nutrition or health claims are made these have to be approved in advance by the [European Food Safety Agency](#) (EFSA).

Allergens

Pre-packed products that contain allergens (such as nuts i.e. peanuts, almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia nuts and Queensland nuts and products thereof) have to be labelled in such a way that it is clearly visible to consumers that they contain allergens.

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 must be manufactured so that they do not transfer their 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.

Full overview of requirements for processed fruit and vegetables and edible nuts:

For a list of requirements consult the [EU Export Helpdesk](#) where you can select your specific product code under chapter 07, 08 and 20.

cafés. New more on the [website](#) of the EU about the new labelling legislation.

- Read more about [food labeling](#) in the EU Export Helpdesk.
- For more information about [nutrition and health claims](#) refer to the website of the EU.
- Refer to Annex IIIa of Directive [2001/13/EC](#) for an overview of all allergens.
- 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: food safety management is crucial, addressing sustainability is gaining ground

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, retailers) 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 by other European retailers). All the mentioned management systems are recognised by the [Global Food](#)

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](#).

[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 large ones 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 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.

- 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 website](#).
- Be aware that many of the environmental and social sustainability issues take place at farm level. 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.
- Consider defining and implementing your own code of conduct. This is not required by buyers, but may be a good way to show potential buyers your views on corporate responsibility. Refer to the [code of conduct](#) of the Fruit Juice Association (AIJN) for inspiration. The AIJN represents a large share of the European fruit juice producers.
- Implementing a management system such as [ISO14000](#) (environmental aspects), OHSAS 18001 (occupational health and safety) or [SA 8000](#) (social conditions) is a way to address sustainability and possibly gain a competitive advantage. Research with your buyer whether this is appreciated.

Niche requirements: a growing market for certified products

Fairtrade Certification

Fairtrade products are produced with extra focus on the social conditions in the producing areas. An example is [Fair Trade](#) which is available for dried fruits and vegetables, fruit juices and nuts. Having your products certified is the most far-going way to prove your business performance for social conditions in your supply chain. After certification by an independent third party, you may put the Fair Trade logo on your product. In general, premium prices are paid for fair trade products. Although growing, the market for Fair Trade certified processed fruit and vegetables and edible nuts is still a niche market.

Organic, niche market

Organic processed fruit and vegetables and edible nuts are produced and processed by natural techniques (e.g. crops rotation, biological crop protection, green manure, compost). Although growing, the size of the

Considerations for action

- Check the Fair Trade Standards for [small producer organisations](#).
- Consult the [Standards Map database](#) for more information on the Fair Trade label.
- 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.

market is still relatively small. To market processed fruit and vegetables and edible nuts in the EU as organic, they must be grown using organic production methods which are laid down in [EU legislation](#) and 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).

Rainforest Alliance

The Rainforest Alliance (RA) standard is a mainstream sustainability scheme with a main focus on environmental issues. Rainforest Alliance only certifies tropical products such as tropical fruits including bananas, pineapple, mango, avocado, guava and citrus and different kinds of nuts. Rainforest Alliance is growing fast in the fresh fruit vegetables market. It is not very big yet in the market for processed fruit and vegetables and edible nuts except for the market of fruit juices such as [Innocent](#).

- 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.

- Consult the [Standards Map database](#) for more information on the RA standard.

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