



# EU Buyer Requirements for spices and herbs

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 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

- **Irradiation**– applicable to spices and herbs

**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*

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 can only be imported under [stricter conditions](#) such as having to be accompanied with a health certificate and analytical test report. Due to food safety concerns some spices and herbs (e.g. capsicums, ginger, nutmeg, curry powder) from certain countries (e.g. India, Indonesia) are subject to increased level of official controls. These are put on a list included in the Annex of [Regulation \(EC\) 669/2009](#).

**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:

- Aflatoxin: for piper nigrum, capsicums, nutmeg, turmeric and ginger the maximum level of aflatoxin is between 5.0 µg/kg for aflatoxin B1 and 10 µg/kg for total aflatoxin content (aflatoxins B1, B2, G1 and G2). For other spices and herbs you will have to check if whether individual EU member states
- Ochrotoxin A: for the same spices and herbs (except capsicums) as well as mixtures thereof the maximum level of OTA is set at 15 µg/kg. In 2014 the limits will also apply to capsicums which is expected to cause problems for suppliers. OTA is hard to prevent as it has a lot to do with climatic conditions.
- Pesticides: the EU has set maximum residue levels (MRLs) for pesticides in and on food products. Products containing more

**Considerations for action**

- The [Quality Minima Document](#) of the European Spice Association (ESA) is leading document for most important the European buyers. It provides an overview of legal requirements and non-legal (e.g. quality, food safety, labelling) requirements.
- Search in the [EU's Rapid Alert System for Food and Feed \(RASFF\) database](#) to see examples of withdrawals of spices and herbs 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. The list of spice and herbs and their supplying countries 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. Valuable sources are the guidelines on:
  - [Code of Hygienic Practice for Spices and Dried Aromatic Plants](#) (Codex Alimentarius)
  - [Good Agricultural Practices \(GAP\) Spices](#)(IOSTA)
  - [Good Manufacturing Practices \(GMP\) Spices](#) (IPC).
- For information on safe storage and transport of spices and herbs go to the [website](#) of the Transport Information Service.
- Suppliers of capsicums should keep the developments regarding the OTA legislation. For more information go to the [EU website](#) on food contaminants/OTA.
- 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

pesticides than allowed will be withdrawn from the EU market. Note that buyers in several Members States (including the UK, Germany, the Netherlands and Austria) use MRLs which are stricter than the MRLs laid down in EU legislation.

- Salmonella: is a particular important source of contamination for piper nigrum and capsicums. However in the current [EU legislation](#), no microbiological criteria for spices and herbs have been set. Food safety authorities however can withdraw imported food products from the market or prevent them from entering the EU when salmonella is found present. Irradiation (see below) is used to combat microbiological contamination.

#### **Irradiation**

To control contamination caused by micro-organisms, viruses, bacteria or insects it is allowed to use irradiation on dried spices and herbs. The maximum overall average absorbed radiation dose is 10 kGy.

In case you irradiate your spices and herbs tell your buyer. Irradiated products will have to be labelled as such.

**Food additives:** some herbs and spices or mixtures thereof may contain colourings, flavourings or sweeteners. There is specific legislation for [additives](#) (e.g. colours, thickeners) and [flavourings](#) that list what E-numbers and substances are allowed to be used. Many of the mixtures rejected by custom authorities or buyers have undeclared, unauthorised or too high limits of extraneous materials (e.g. colourants and flavourings). Especially mixtures with illegal artificial colourants (azo-dyes Sudan I, tatrazine, butter yellow) are often rejected and destroyed by EU custom authorities. Although these may be approved by the food authority in the country of origin, some of them may not be approved in the EU.

#### **Full overview of requirements for spices and herbs:**

For a list of requirements, spices and herbs consult the [EU Export Helpdesk](#) where you can select your specific product code under chapter 09.

### **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,

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 pest control strategy that uses complementary strategies including growing practices and chemical management.
- Read more about [MRLs](#) in the EU Export Helpdesk.
- Many buyers in the EU will expect a test report on the microbiological contamination of your products. Providing this service will make it easier to find buyers in the EU.
- 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 Export Helpdesk](#)
- Please note that irradiation is less damaging for the taste of spices and herbs than steam sterilisation. However, consumers generally prefer non-irradiated products. Therefore, this method is not widely used.
- Read more about [irradiation](#) on the website of the EU.
- In case you use additives make sure you mention them in the list of ingredients.
- Read more about food additives, enzymes and flavourings on the [website](#) of the EU.

#### **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

food processors, retailers) require the implementation of a (HACCP-based) food safety management system. The most important food safety management systems 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 British 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 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.

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 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.
- 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.
- 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 requirements: a growing market for certified sustainable products

#### Fairtrade Certification

A niche market is the market for spices and herbs produced with extra focus on the social conditions in the producing areas. An example is [Fair Trade](#) which a way to prove your business performance for social conditions in your supply chain. After certification by an independent third party, you may put the Fairtrade logo on your product. In general, premium prices are paid for fair trade products.

#### Considerations for action

- Check the Fair Trade Standards for [small herb and spice producer organisations](#).
- Sustainable pepper will only be used in the food processing industry if the end-product manufactured has a similar certification. Therefore always check with your buyer if he requires certification.
- Consult the [Standards Map database](#) for more information on the Fair Trade label.

Although growing, the market for Fairtrade certified spices and herbs is still a niche market. The largest share is sold as spices and herbs in the retail channel. At the moment there is not a large share of Fairtrade food products (e.g. no Fairtrade meat). Therefore the food processing industry, largest user of spices and herbs, is not a big user of certified spices and herbs.

### **Organic, niche market**

Organic spices and herbs are produced and processed by natural techniques (e.g. crops rotation, biological crop protection, green manure, compost). After years of growth, the market for organic spices and herbs is relatively small. To market spices and herbs 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. It is fairly new to the spice market but growing in popularity fast. The [Sustainable Spice Initiative](#) (SSI) was founded by a consortium of leading players in the EU spices market together with civil society organizations. It is a large driver behind RA certification projects in several producing countries. Its ambition is that in 2015 20% of all black and white pepper imported by the EU from Indonesia and Vietnam and 10% of three other spices imported from Vietnam, Indonesia or Madagascar should be sustainably produced. Whether this objective will be met is not sure but it fuels a large demand for sustainable spices and herbs significantly in coming years.

- 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.
- Read the [Marketing Manual and Web Directory for Organic Spices, Culinary Herbs and Essential Oils](#) of ITC to get a better understanding of the market side.
- Consult the [Standards Map database](#) for the different organic labels and standards.
  
- See the SSI [report](#) for more background info on sustainability issues in the pepper chain and a roadmap towards a sustainable supply chain.
- Consult the [Standards Map database](#) for more information on the RA standard.

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

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