

Fresh Fruit and Vegetables

What requirements should fresh fruit or vegetables comply with to be allowed on the European market?

Europe is very demanding about food safety, which is why dealing with fresh agricultural products is subject to various legal and other buyer requirements. But there are also opportunities to distinguish yourself by applying additional or niche market quality standards. This document provides an overview of the most common requirements and standards, as well as the specific requirements that apply to niche markets such as organic or Fairtrade fruit and vegetables.

1 . Which legal and non-legal requirements must your product comply with?

When exporting fresh fruit and vegetables to Europe, you have to comply with the requirements below. These requirements can be categorised as:

1. food safety;
2. product quality;
3. social, environmental and business compliance.

For a full list of legal requirements, please consult the [EU Trade Helpdesk](#), where you can select your specific product code under Chapters 07 and 08.

Limited use of pesticides

To avoid health and environmental risks, the European Union (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 Products containing more pesticides than allowed will be withdrawn from the European market.

Note that buyers in several Member States such as the United Kingdom, Germany, the Netherlands and Austria use MRLs which are stricter than the MRLs laid down in European legislation. Supermarket chains are the strictest and demand 33% to 70% of the legal MRL.

More and more buyers ask for upfront information about your pesticide spray programmes and records. Shipments are checked before they are sent to the retailer. Pesticide management takes a lot of responsibility on your part as a producer or exporter.

Tips:

- Use the [EU Pesticide Database](#) to find out the MRLs that are relevant for your products. You can select your product or a pesticide and the database shows the list of associated MRLs.
- Apply [integrated pest management](#) (IPM) to reduce the amount of pesticides. IPM is an agricultural pest control strategy which is also part of [GLOBALG.A.P.](#) certification. It uses natural control practices such as the application of pests' natural enemies. The fewer chemicals you use, the better your marketing position will be for export to Europe.

- Always check whether your buyers have additional requirements for MRLs and pesticide use.

Avoiding contaminants

Contaminants are substances that have not been intentionally added to food, but may be present as a result of the various stages of its production, packaging, transport or holding. Similar to the MRLs for pesticides, the European Union has set limits for several contaminants. Especially the limits for nitrate (in spinach and lettuce) and heavy metals such as cadmium, lead, mercury and inorganic tin, are relevant for fresh fruit and vegetables. For most fresh fruit or vegetables the limit for lead contamination is 0,10 mg/kg and for cadmium 0,050 mg/kg.

Tips:

- Find the maximum contaminant levels in the Annex of Regulation (EC) 1881/2006. Check whether your food product is included in one of the product groups. Be aware that the particular product may not be mentioned specifically but can be included in a wider product group. For instance, mango may not be found, but fruit can.
- Find out more about the prevention and reduction of lead contamination in the Code of Practice published by the FAO Codex Alimentarius.
- Check the European Commission's fact sheet on food contaminants Managing food contaminants: how the EU ensures that our food is safe.
- Read more about contaminants on the website of the European Commission.

Microbiological criteria for pre-cut fruit

When supplying pre-cut fruit and vegetables, as well as unpasteurised juices or sprouted seeds, you must take into account microbiological hazards such as salmonella and *E. coli*. These substances should be absent when testing your product. European Regulation (EC) No 2073/2005 will provide you with information about testing methods, sampling plan and measuring limits.

Tip:

- Make sure to maintain excellent hygiene practices in your production process to avoid microbiological contamination. Work with hygiene standards and risk assessment such as HACCP. See the certification schemes below, such as BRC and IFS, which are based on HACCP principles.

Plant health

Fruit and vegetables exported to the European Union must comply with European legislation on plant health. The European Union has laid down phytosanitary requirements to prevent the introduction and spread of organisms harmful to plants and plant products in Europe. These requirements are managed by the competent food safety authorities in the importing and exporting countries. Most importantly, your home country needs to have phytosanitary agreements with the European Union in place. Otherwise, you will not be allowed to export to Europe.

The following fruit and vegetables are subject to health inspections and require phytosanitary certificates prior to shipping:

- leafy vegetables (celery, basil);

- citrus fruit;
- kumquat;
- eggplant;
- persimmon (kaki):
- apple;
- pear;
- mango;
- passion fruit;
- plums;
- guava;
- currants;
- blueberry;
- several exotic products such as rose apple, soursop (guanábana), quince and bitter cucumber.

You can find these products and their Latin names in Annex V, Part B (p. 163) of the European Plant Health Directive 2000/29/EC.

Tips:

- Verify with the National Plant Protection Organisation or food safety authority in your country whether and under which conditions you can export fresh fruit and vegetables to Europe. These authorities normally work with international standards, but always check with your buyer as well.
- Read more about plant health on the EU Trade Helpdesk. A model phytosanitary certificate can be found through Annex VII (p. 170) of the Plant Health Directive.

Marketing Standards

European legislation sets general and specific marketing standards for the minimum quality and the minimum maturity of all fresh fruit and vegetables. A marketing standard determines the characteristics of “Extra Class”, Class I and Class II products, the different size codes, and the allowed tolerances in quality and size.

The preferred sizes vary between the different European markets, but the quality is generally “Extra Class” or Class I. You might find a market for Class II products in some eastern European countries, the processing industry or less formal segments.

There are specific marketing standards (MS) for the fresh fruit and vegetables listed below. These products must be accompanied with a certificate of conformity for each consignment. These certificates can be issued by the European control bodies and in some cases by the country of origin. A sample certificate of conformity can be found on p. 115 in Annex III to EU Regulation No 543/2011:

- apples;
- citrus fruit;
- kiwi fruit;
- lettuce, curly and broad-leaved endives;
- peaches and nectarines;
- pears;

- strawberries;
- sweet peppers;
- table grapes;
- tomatoes.

Fresh products that are not covered by a specific marketing standard have to comply with:

- the general marketing standards (GMS) in Annex I, Part A of EU Regulation No 543/2011; or
- the applicable UNECE standard (sometimes less strict than the EU standard).

Operators are free to choose whether to work with the EU or UNECE standard. If your product is not covered by any specific European standard, you can also check for similar standards in the Codex Alimentarius.

Imports of products intended for processing are not subject to compliance with the EU marketing standards. However, they must be clearly marked on the packaging with the words "intended for processing" or other equivalent wording

Tips:

- Be on top of quality! If you are not sure, do not send your products but rather look for local alternatives. If you decide to ship your products anyway, be transparent about the quality and discuss this beforehand with your buyer.
- Check which standards are applicable to your product and make sure that your products and the necessary documentation are in order. By filling in your export details at the EU Trade Helpdesk (product codes in Chapter 7 or 8), you can find the contact details of the official authorities by following the link on marketing standards.
- Check out the Codex Alimentarius published by the Food and Agriculture Organization (FAO) to find additional marketing standards for fresh fruits and vegetables.

Control of food imported to the EU

To ensure food safety and avoid environmental damage, your products will be subjected to official controls. These controls are carried out to ensure that all foods marketed on the European market are safe and in compliance with all applicable regulatory requirements.

There are three types of checks:

- a) documentary checks;
- b) identity checks;
- c) conformity checks to marketing standards.

In case of repeated non-compliance of specific products originating from particular countries, the European Union can decide to carry out controls at an increased level or lay down emergency measures. Controls can be carried out at all stages of import and marketing in Europe. However, most checks are done at the points of entry.

For importers of fresh fruit and vegetables, the traceability of products is compulsory. To fulfil this obligation, European importers will require you to provide proof of origin for all fruits and vegetables. In addition to a Bill of Lading, phytosanitary certificate, packing list and custom documentation, you must also use a unique traceability code such as a lot number or GLOBALG.A.P. Number (GGN).

Tips:

- Familiarise yourself with the procedures. 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, classes and sizes, number of pallets and boxes, and names of growers.
- Check the documents needed for customs clearance in the European Union.

Certification as guarantee

As food safety is a top priority in all European food sectors, you can expect most buyers to request extra guarantees from you in the form of certification. All buyers in the supply chain, such as traders, food processors and retailers, require the implementation of a food safety management system based on hazard analysis and critical control points (HACCP).

GLOBALG.A.P.

The most commonly requested certification scheme, essential for exporting fresh produce to Europe, is GLOBALG.A.P. This is a pre-farm-gate standard that covers the whole agricultural production process from before the plant is in the ground to the non-processed product (processing not covered). 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.

BRC

In addition to GLOBALG.A.P., other food safety management systems can be required as well. Almost all buyers on the north-western European market will require you to comply with the BRC Global Standards, which are widely applied as a standard for hygiene and safety.

IFS, SQF, FSSC 22000

On the European mainland, buyers sometimes require you to comply with the IFS food standard, Safe Quality Food (SQF) programme, FSSC 22000 or other industry-developed standards.

All the mentioned management systems are recognised by the Global Food Safety Initiative (GFSI), which means that they are generally accepted by the major retailers. Compliance with certification schemes varies between countries, trade channels and market situations. Buyers can be more lenient during supply shortages.

Tips:

- Read more about the different food safety standards on the [ITC Standards Map](#) or consult the [Global Food Safety Initiative \(GFSI\)](#). It contains a [benchmark](#) for relevant additional standards.
- Become familiar with [GLOBALG.A.P.](#), as your EU market entry preparation is likely to include GLOBALG.A.P. certification.
- Check with your buyer about their preferred food safety management system and certification, as these are often buyer-specific.

Labelling and packaging

Food placed on the EU market must meet the legislation on food labelling.

Cartons of fresh fruit or vegetables must mention the following particulars:

- name and the address of the packer or the dispatcher;
- name and variety of the produce (if the produce is not visible from the outside of the packaging);
- country of origin;
- class and size (referring to the marketing standards);
- lot number for traceability or GGN if certified GlobalG.A.P. (recommended);
- official control mark to replace name and address of the packer (optional).

For consumer and pre-packed fresh products, you must add the name and the address of a seller established within the European Union with the words “Packed for:” or an equivalent phrase.

Packaging marketed within Europe must comply with the general requirements, which aim at protecting the environment, as well as with the specific provisions designed to prevent any risk to the health of consumers. The packaging must protect the product against contamination, leakage and dehydration. Also pay attention to your buyer’s preference for presentation, such as individual wrapping or sortation (for example, one side up). Products and packaging should be uniform.

Tips:

- Make sure that all mandatory information is mentioned, but also think of other useful information such as logos of importers or certificates.
- Read the [labelling and packaging guidelines](#) and regulations on the EU Trade Helpdesk.
- See the [Recommended International Code of Practice for Packaging and Transport of Tropical Fresh Fruits and Vegetables \(CAC/RCP 44-1995\)](#) for instructions on handling, packaging and transport.

2 . Which additional requirements do buyers often have?

European buyers often have specific requirements, depending on their sales channels and product segments. Common buyer requirements include the following:

Social and environmental compliance

There is growing attention for the social and environmental conditions in the producing areas. Most European buyers have a code of conduct to which they will

expect you to adhere. For most fresh fruit and vegetables, social compliance is important, although product quality is the top priority.

Initiatives and attention relating 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 in western Europe some multinationals even have their own compliance programme. Examples include Unilever's Sustainable Agriculture Code and Tesco's Nurture accreditation.

Buyer initiatives which have an impact on you as a supplier in terms of social compliance include:

- the IDH Sustainable Trade Initiative, which has a Fresh & Ingredients programme with the aim to increase imports of sustainably produced crops by 25% in 2020 (against the 2016 baseline);
- the Business Social Compliance Initiative (BSCI) in north-western Europe;
- the Global Social Compliance Programme (GSCP), which provides reference and self-assessment tools;
- Sedex, a non-profit membership organisation to evaluate and manage your performance on labour rights, health and safety, the environment and business ethics;
- the Ethical Trading Initiative (ETI) in the UK.

Examples of social or sustainable labels for fresh fruit and vegetables are:

- GRASP;
- Fair for Life;
- Fairtrade;
- Rainforest Alliance/UTZ (as part of the Sustainable Agriculture Network).

Fairtrade labels are not on the top of the list of buyers because of their complex requirements and high costs. GRASP, which is part of GLOBALG.A.P., is more accessible and is gaining in importance.

Tips:

- Consult the ITC Standards Map for the different labels and to learn about differences between Fairtrade labels.
- Check your company's current performance; for example, by doing a self-assessment on the BSCI website (search for "self-assessment").
- Check with your buyer which social protocol they request. If you choose to certify your production with a Fairtrade label, find a specialised European buyer who is familiar with these products.

Soft skills and company performance are also important

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. Buyers look for trust and reliability, which means that your soft skills and performance are just as important as your product. 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 rather settle by claiming a quality issue. It is crucial that you can deal professionally with claims, whether they are justified or not.

Tips:

- First of all, make sure that you are well organised as a company. This organisation includes maintaining a good logistics planning, documenting your shipments (including proof of quality), responding to your emails within a day and being professional in every aspect of the business.
- Do not put your product in consignment with a buyer whom you do not know. Consignment is not a standard practice any more 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.
- Also see the [CBI tips for doing business with European buyers of fresh fruit and vegetables](#) on the market intelligence platform.

3 . What are the requirements for niche markets?

In addition to the official and common requirements, specific requirements apply to niche markets such as organic fruit and vegetables.

Organic, a growing niche market

An increasing number of European consumers prefer food products that are produced and processed using natural methods. Organic fruit and vegetables have a higher cost of production but are also better valued on the European market.

To market organic products in the European Union, you have to use organic production methods, which are laid down in [EU legislation](#).

Furthermore, you have to use these production methods for at least two years before you can market the fruits and vegetables as organic.

You (or your importer) must apply for an import authorisation from EU organic control bodies. After being audited by an accredited certifier, you may put the EU organic logo on your products, as well as the logo of the standard holder; for example:

- [Soil Association](#) (especially relevant in the UK);
- [Naturland](#) (Germany);
- [BioSuisse](#) (Switzerland).

Each standard is slightly different, but they all comply with EU legislation on organic production and labelling.

Tips:

- Assess the organic market potential for your specific product. Inform yourself well, because implementing organic production and becoming certified can be expensive and time-consuming.
- Find importers that specialise in organics through trade fairs such as [Biofach](#) or [Fruit Logistica](#) and company directories such as the International directory of organic food wholesale & supply companies ([Organic-bio](#)). Organic importers often play an active role in advisory and guidance of producers.
- Read more about organic farming on an informative website of the [European Commission on organic farming](#).

New legislation for organic

The European Commission made a [proposal for new organic legislation](#) in 2014 and a new set of rules are scheduled to be implemented in July 2020. According to the [European Council](#), this new agreement aims to guarantee fair competition, prevent fraud and improve consumer confidence. Importers have already started to implement the stricter regulations.

In general, organic regulation and testing are expected to become rigorous. Traces of unauthorised substances can result in a direct withdrawal of Organic certification.

Tip:

- Find more information on the new proposal for organic farming in the press release and the [frequently asked questions](#).