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## [What requirements should fresh fruit or vegetables comply with to be allowed on the European market?](#)

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

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Exporting fresh fruit and vegetables to Europe requires you to keep high standards of food safety and quality. Beside quality, your social and environmental conduct has also become a precondition to do business, and buyers often ask for certifications as a guarantee. However, there are also opportunities to distinguish yourself by applying additional or niche market standards.

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## 1. What are mandatory requirements?

When exporting fresh fruit and vegetables to Europe, you have to comply with the requirements for food safety and product quality.

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

Another good source to find a complete overview of legal requirements is "[Your guide to EU fresh produce law](#)" on the Freshfel website [freshquality.eu](http://freshquality.eu).

### 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 Products containing more pesticides than allowed will be withdrawn from the European market.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 maintain the highest standards and generally demand 33% to 100% of the legal MRL. The German discounter Lidl is one of the strictest, with a limit of 33% of the EU legal standard for single active substances. Some of the supermarket chains impose financial penalties when a violation of their limit is detected.

MRLs can become stricter with new insights from Europe's food safety authorities. Supermarkets tend to follow their competitors and it is possible that several of them will still tighten their requirements. For importers, it is the easiest to work with the highest (Lidl) standard to maintain flexibility.

Pesticide management takes a lot of responsibility on your part as a producer or exporter. More and more buyers ask for upfront information about your pesticide spray records, and shipments are checked before they are sent to the retailer. For future business, you must take into account that your responsibility as an exporter will play an important role as retail chains put more pressure on their suppliers.

## 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. Always check whether your buyers have additional requirements for MRLs and pesticide use.
- Apply [integrated pest management](#) (IPM) to reduce the amount of pesticide. 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.

## Avoiding contaminants

Contaminants are substances which have not been intentionally added to food but which 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. For fresh fruit and vegetables, your main concerns will be the contamination of lead, cadmium and nitrate (mainly for spinach, lettuce and rucola).

**Table 1: The current limits for lead and cadmium in fresh fruit and vegetables (December 2019)**

Maximum level of lead:

- |  |                       |
|--|-----------------------|
| • Fruit, excluding cranberries, currants, elderberries and strawberry tree fruit | 0.10 mg/kg wet weight |
| • Cranberries, currants, elderberries and strawberry tree fruit                  | 0.20 mg/kg wet weight |

Maximum level of cadmium:

- |   |                        |
|---|------------------------|
| • Vegetables and fruit, excluding root and tuber vegetables, leaf vegetables, fresh herbs, leafy brassica, stem vegetables, fungi and seaweed                                       | 0.050 mg/kg wet weight |
| • Root and tuber vegetables (excluding celeriac, parsnips, salsify and horseradish), stem vegetables (excluding celery); for potatoes, the maximum level applies to peeled potatoes | 0.10 mg/kg wet weight  |
| • Leaf vegetables, fresh herbs, leafy brassica, celery, celeriac, parsnips, salsify, horseradish and certain fungi (common mushroom, Oyster mushroom, Shiitake mushroom)            | 0.20 mg/kg wet weight  |

The rules for fruit and vegetables that are processed (for example, dried fruit or juices) may differ. As the regulation is also regularly updated, you must keep yourself up to date. New insights into or threats to food safety and contaminants can always lead to adjustments in the regulations.

## Tips:

- Maintain good contact with your buyers, because they will often keep you up to date with changes in regulation which affect the fresh fruit and vegetables business.
- Read more about contaminants on the [website of the European Commission](#) and find an overview of the [maximum contaminant levels in the Annex of Regulation \(EC\) 1881/2006](#). Try to check this information on an annual basis.
- 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](#).

## Microbiological criteria for pre-cut fruit

When supplying pre-cut fruit and vegetables, you must take into account microbiological hazards such as Salmonella and *E. coli*. Salmonella must be absent throughout the shelf life of a freshly cut product. *E. coli* should be practically absent during the manufacturing process.

[European Regulation \(EC\) No 2073/2005](#) will provide you with information about testing methods, sampling plans 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 by [developing an HACCP plan](#). Also see the certification schemes below, such as BRC and IFS, which are based on HACCP principles.

## Plant health and phytosanitary regulations

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.

Most fresh fruit and vegetables are subject to health inspections, and require phytosanitary certificates prior to shipping. This group includes leafy vegetables, tomatoes, peppers, citrus fruit, stone fruit, berry fruit, apples, pears, mangoes and avocados, among many other things. You can find these products and their Latin names in Annex V, Part B of the [updated European Plant Health Directive 2000/29/EC](#) (September 2019). Fresh fruits that do not require a phytosanitary certificate are pineapple, banana, coconut, durian and dates.

Since 1 September 2019, the [new European Directive \(EU\) 2019/523](#) has sharpened the phytosanitary requirements with extra protective measures to reduce the risk of fruit flies, for example. This new Directive puts more pressure on plant health authorities. Authorities in producing countries have to be able to declare a region pest-free or to perform checks on specific areas and product treatments. A specific import ban is in force for fruits of the *Momordica L.* genus (bitter melon) originating from third countries or areas of third countries where *Thrips palmi* Karny (melon thrips) is known to occur and where effective mitigation measures for that pest are lacking.

Countries, authorities and exporters that are not prepared for the increased pest control will have difficulties to export their fresh fruit and vegetables to Europe. As an exporter, you must stay up to date with the rules and work closely with the food safety authority in your country.

## Tips:

- Familiarise yourself with the phytosanitary rules on exports to Europe, laid out in [Council Directive 2000/29/EC](#) and the new [Implementing Directive 2019/523](#) on the protective measures against the introduction of organisms harmful to plants or plant products and against their spread within the community.
- 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 of fresh fruit and vegetables. A marketing standard determines the characteristics of “Extra Class”, Class I and Class II products, the minimum maturity, the different size codes, and the allowed tolerances in quality and size. Over the years, the marketing standards have been aligned with the [UNECE standards for fresh fruit and vegetables](#). These standards provide guidance to businesses and generally change little.

The preferred sizes sometimes 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 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 by the country of origin in some cases. An example of a [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 (GMS) 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 unsure about your product, do not send it but rather look for local alternatives. If you decide to ship your products anyway, be transparent about the quality and discuss this matter 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 on 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 to 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 in the European Union**

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 are in compliance with all applicable regulatory requirements.

Compulsory plant health checks are carried out on all plants and plant products coming from non-EU countries (listed in [Annex V, Part B](#) of Directive 2000/29/EC) for:

- Phytosanitary certificates and documents to ensure that the consignment meets EU requirements;
- Identity to ensure that the consignment corresponds to the certificate;
- Inspection to ensure that the consignment is free from harmful organisms.

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.

In case of repeated non-compliance of specific products originating from particular countries, the European Union can decide to

carry out more regular controls 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, 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 that are common for imports from developing countries with a [Generalised Scheme of Preferences \(GSP\)](#).

### **Tips:**

- Familiarise yourself with the procedures. See the CBI tips for organising your export 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 European Union on the EU Trade Helpdesk.
- Check out the [Factsheet on Food Traceability of the European Commission](#).

### **Labelling and packaging**

Food placed on the EU market must meet the legislation on food labelling. Trade packages and cartons of fresh fruit or vegetables must mention the following particulars:

- Name and address of the packer or 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);
- Post-harvest treatment; for example, anti-moulding agents added in a post-harvest treatment of citrus fruits must be mentioned on the trade package;
- Organic certification, including name of inspection body and certification number (if applicable).

When fruit or vegetables are processed or directly packed for consumption, you must include appropriate labelling for consumers:

- Common name of the product;
- Full name of the country of origin;
- Name and address of the producer, packer, importer, brand owner or seller (retailer) in the EU who places the product on the market, and the wording "Packed for:", if applicable;
- Net content in weight;
- Minimum durability – a best-before date (on all processed fruit and vegetables, such as freshly cut);
- Producer identification or lot number;
- List of ingredients (if applicable), including additives and post-harvest treatment;
- Allergenic declaration (if applicable);
- Declaration of nutritional value (when mixed with other foodstuffs);
- Packed in protective atmosphere, if applicable;
- Additional information about quality class, size, variety or commercial type and post-harvest treatment on the product labelling or in close proximity (on the shelf) for products with specific marketing standards.

The European Union (EU) requires that the text on the label must be written in one of the official languages of an EU Member State and be understandable for the consumer.

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.

In the future, you can expect stricter regulations on the use of plastic in packaging. The new [EU Directive 2019/904 on the reduction of the impact of certain plastic products on the environment](#) already intends to limit the use of single-use plastics by transferring the cost of waste and responsibility to the producer. With the [European strategy for plastics](#), more and more buyers will demand alternative and environmentally friendly packaging.

## Tips:

- Make sure that all mandatory information is mentioned, but also think of other useful information such as logos of importers or certificates. Always discuss additional requirements with your buyer.
- Study the [GSI Legal Requirements for Labels on Fruit & Vegetables](#) as a guideline on legal requirements for consumer units and trade units in the European Union. This guideline provides a great overview of labelling requirements for different consumer and trade packages.
- Read more about [labelling and packaging guidelines for foodstuffs on the EU Trade Helpdesk](#). If your product is pre-packed for retail, check the additional requirements in [Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#).
- See the [Recommended International Code of Practice for Packaging and Transport of Tropical Fresh Fruits and Vegetables](#) for instructions on handling, packaging and transport.
- Contact Open Trade Gate Sweden if you have [specific questions about the rules and requirements in Sweden and the European Union](#).

## 2. 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.

### 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 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.

### BRCGS

In addition to GLOBALG.A.P., other food safety management systems can be required as well; for example, for the handling or processing of fresh fruit and vegetables. 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 food 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, but you can only do business in general when

certifications and standards are in place. Living up to these standards will only become stricter and more widespread in the future.

### **Tips:**

- Implement a food safety management system. Check the [FAO Guidelines for the implementation of HACCP](#).
- Check with your buyer about their preferred food safety management system and certification, which are often buyer-specific. At the least, become familiar with [GLOBALG.A.P.](#), as your EU market entry preparation is certain to include GLOBALG.A.P. certification.
- Find specific standards that are available in your country and relevant for your export market on the [ITC Standards Map](#).

### **Social and environmental compliance**

There is growing attention to the social and environmental conditions in the producing areas. Most European buyers have a code of conduct, with which they will expect you to comply. 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 programme. Examples include Unilever's [Sustainable Agriculture Code](#) and [Tesco's Nurture](#) accreditation. In some cases, the increasing attention to social and environmental conditions requires specific actions; for example, in water management in arid areas.

Buyer initiatives which affect you as a supplier in terms of social compliance include:

- The [IDH Sustainable Trade Initiative](#), which has a [Sustainability Initiative \[for\] Fruit and Vegetables \(SIFAV\)](#) with the aim to have 100% sustainable imports of fruits and vegetables from Africa, Asia and South America by 2020. SIFAV is a pan-European initiative with over 40 partners, including retailers, brands, traders and civil-society organisations from the Netherlands, Belgium, Denmark, Germany, Sweden, Switzerland and the United Kingdom;
- The [Business Social Compliance Initiative](#) (BSCI) in north-western Europe, which includes a [Code of Conduct](#) for all its participants;
- 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 business standards for fresh fruit and vegetables are:

- [Sedex-SMETA](#) (for businesses);
- GLOBALG.A.P. [GRASP](#) (for businesses).

Fairtrade labels are not on the top of the list of buyers because of their complex requirements and high costs. SMETA and GRASP are more accessible and are gaining in importance.

### **Tips:**

- Consult the [ITC Standards Map](#) for the different labels, and to learn about differences between social and environmental standards.
- Check your company's current performance; for example, by doing a self-assessment on the [BSCI website](#) (search for "self-assessment").

### **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 which have a poor reputation or which 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 which you do not know. Consignment is not a standard practice anymore 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.
- Read the [Tips for doing business with European buyers of fresh fruit and vegetables](#) on the CBI 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**

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 to market organic products in the European Union, you must use organic production methods, which are specified in [European legislation](#). You must have used these production methods for at least 2 years throughout the conversion period before you can certify your product as Organic.

If you wish to become an organic farmer or exporter, you must be registered and certified through a recognised control body. The control agency or body is responsible for verifying that the operator complies with organic rules. A yearly inspection and a set of checks make sure that you comply with the rules on organic production.

After being audited by an accredited certifier, you can use the [EU organic logo](#) on your products, along with the logo of the standard holder.

### **Image 1: The official Organic label for organic products in Europe**





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.

In 2021, the [new organic Regulation](#) will enter into force together with the new Official Control Regulation. Beside checking the compliance with European rules for imported products, it will also reinforce the controls and enhance possible actions against fraudsters. As a third-country producer, you will have to comply with the same set of rules as those producing in the European Union.

Maintaining the required soil fertility and water retention, avoiding cross-contamination, and using organic inputs and reproductive materials can be a challenge for farmers in countries with tropical climates or with limited access to organic reproductive material and inputs.

### 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. On the European Commission's website, you can find [the current list of control bodies](#).
- Find importers that specialise in organic products 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 advising and guiding producers.
- Read more about organic farming on an informative website of the [European Commission on organic farming](#), and find more information on the new legislation for organic farming in the press release and the [frequently asked questions](#). The official regulations include [Regulation \(EC\) No 834/2007](#) on organic production and labelling of organic products, and [Regulation \(EC\) No 1235/2008](#) laying down detailed rules for imports of organic products from third countries. In 2021, the new [Regulation \(EU\) 2018/848](#) will be implemented.

### Fairtrade and environmental labels

Fairtrade and Sustainable certification is a niche requirement 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. Well-known labels include:

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

Typical fruit varieties that can be found with these labels are bananas, pineapples and coconut, for example.

### Tips:




- Consult the [Standards Map database](#) for a list of labels, along with their similarities and differences. Enter your product, country and destination country to find certification schemes that fit your product.

- Find a specialised European buyer who is familiar with these social product labels if you choose to certify your production.

This study has been carried out on behalf of CBI by [ICI Business](#).

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