Import requirements for Fresh Fruit and Vegetables

IPD guides for success in export

ipd
IMPORT PROMOTION DESK
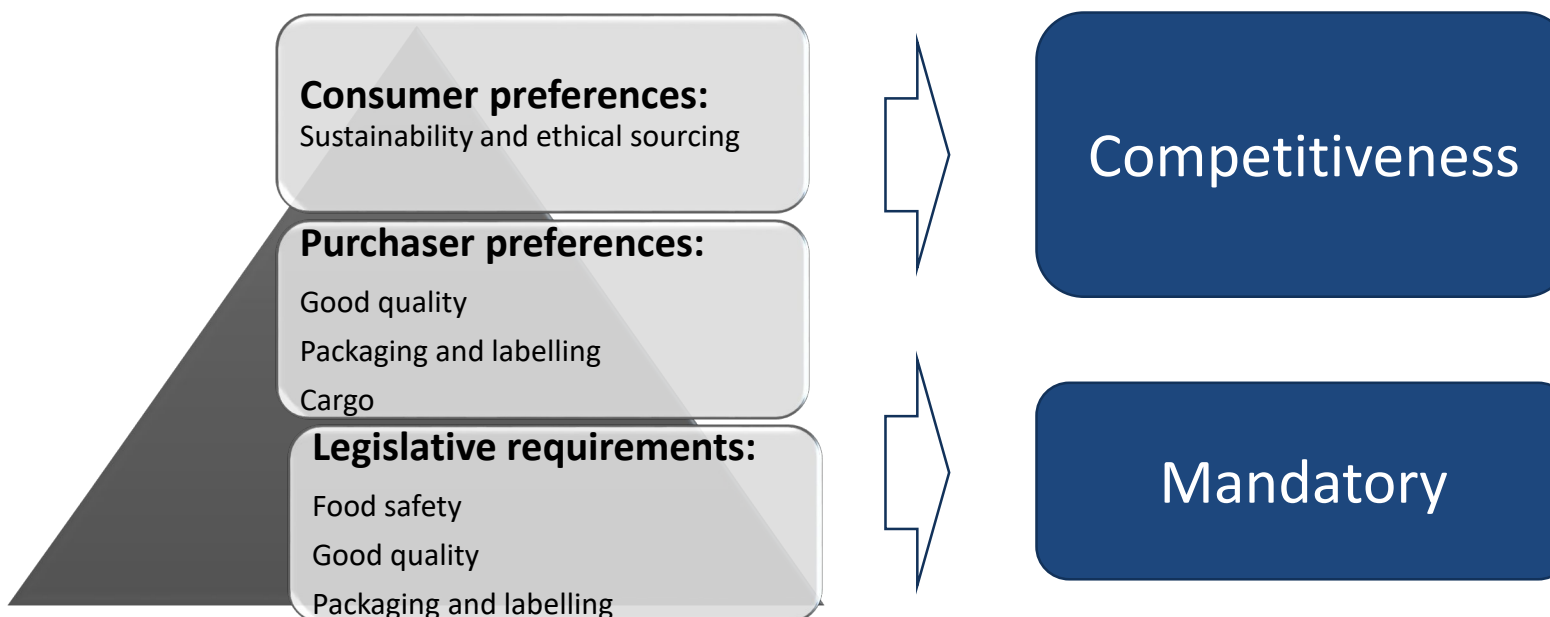
How to use the „IPD Guide on Import requirements"

+ This guide is a resource to help you and your company better understand the topic of "Import Requirements". It is not a comprehensive guide to all import requirements concerns in any industry, but is instead a "key issues" guide to messages every international operating company should know about.

In this guide, you will learn about:
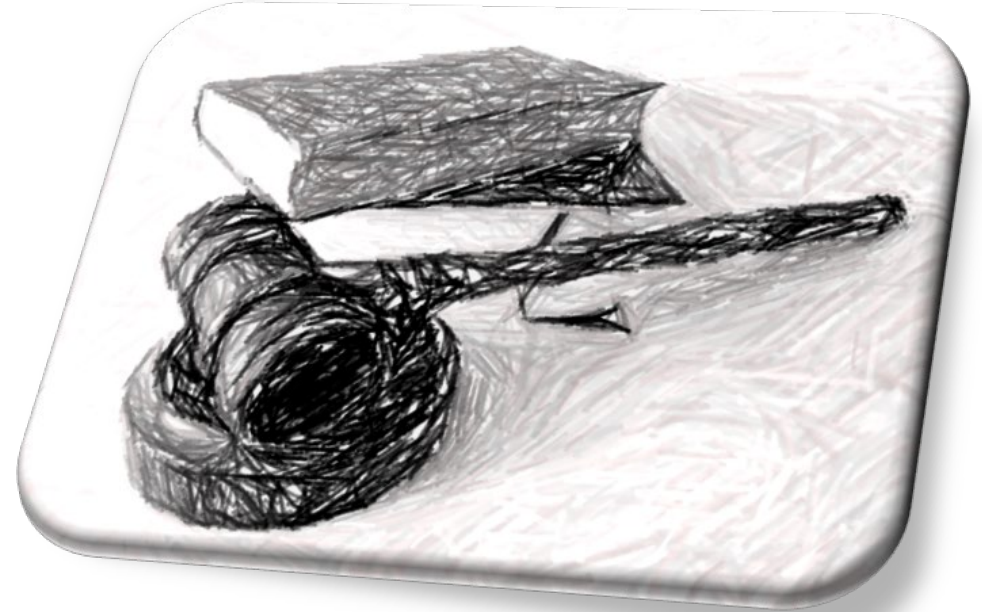
Type of requirement according to priority

In order to export to the EU, you have to comply with specific requirements. However, there are some requirements that are set by the **EU legislation** and are thus **mandatory**. Other requirements described in this guide are demand driven **preferences of European importers**, or market trends and **consumer preferences**. These are, although not obligatory by law, important, since they can improve your **competitiveness** and help you find purchasers in the European market.

Consumer preferences:
Sustainability and ethical sourcing

Purchaser preferences:
Good quality
Packaging and labelling
Cargo

Legislative requirements:
Food safety
Good quality
Packaging and labelling

Competitiveness

Mandatory

Legislative requirements

Legislative requirements are mandatory and aim to ensure **food safety**, by assuring that food products are safe and suitable for human consumption (the general principles and requirements on food safety are laid down in [Regulation (EC) No 178/2002](#)).

That is why compliance with legislative requirements is the **fundamental precondition** to export to the EU.
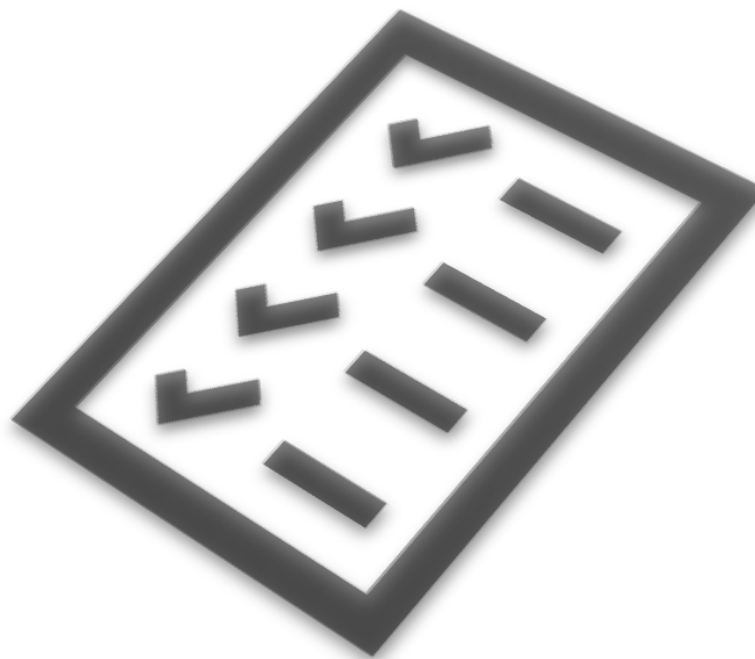
Legislative requirements

For exporters of food products of non-animal origin, the most important topics regarding legislative requirements are:

- ✓ Food hygiene

- ✓ Maximum levels of contamination

- ✓ Plant health

- ✓ Traceability

Legislative requirements

How can you comply with these requirements?

Food Hygiene:

According to the EU Regulation on food hygiene
(Regulation (EC) No 852/2004), food
business operators should implement procedures based on the **HACCP principles** (see the IPD Guide on HACCP).

Legislative requirements

Compliance with maximum levels of contamination:

Regulation (EC) 396/2005 of the European Commission rules the **Maximum Residue Levels (MRL) for pesticides.**

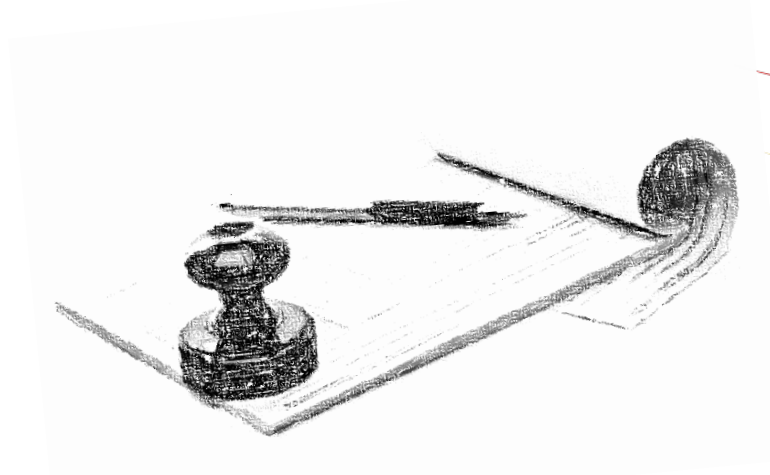+   You can find MRLs to specific products in the EU pesticides database.

However, European importers often have even **stricter MRLs.**

+   In order to comply with the required MRLs for pesticides, you can implement an Integrated Pest Management (IPM) **system**, which aims to control agricultural pest by applying growing practices and chemical management.

+   A way of implementing IPM is getting GLOBALG.A.P. certified, since it also includes an integrated pest control system. Moreover, GLOBALG.A.P. includes HACCP principles.

Legislative requirements

Plant health:

To prevent the introduction and spread of organisms harmful to plants and plant products in Europe, some exports of plants and plant products to the EU must be accompanied by a **plant-health certificate** issued by the relevant competent authorities of the exporting country.

+ Plants or plant products that need a plant-health certificate are specified in Part B, Annex V of the Directive 2000/29/EC.

+ In order to get the plant-health certificate, you must comply with requirements of the **National Plant Protection Organisation** in your country. You can find the respective contact-point here: https://www.ippc.int/en/countries/all/contactpoints/.

Legislative requirements

Traceability:

Traceability of food is the **ability to track food products** through all steps of the value chain.

+   Regulation (EC) 178/2002 includes provisions on traceability, so buyers will expect you to document your suppliers as well as the fertilizers or pesticides that are used in production. Also, the final product must be labeled in order to guarantee traceability in case of a food safety issue. GLOBALG.A.P. certification covers the traceability topic.

+   See the IPD Guide on Traceability.

Refer to the EU Trade Helpdesk for more information on legal requirements.

Legislative requirements

What happens if you do not comply with legislative requirements?

The EU has implemented a system of information exchange among the Member States: RASFF – the Rapid Alert System for Food and Feed, which enables the sharing of notifications between European countries.

In case that any **non-compliance** with legislative requirements is detected, the **RASFF will notify importers** which might cause **reputational damage**.
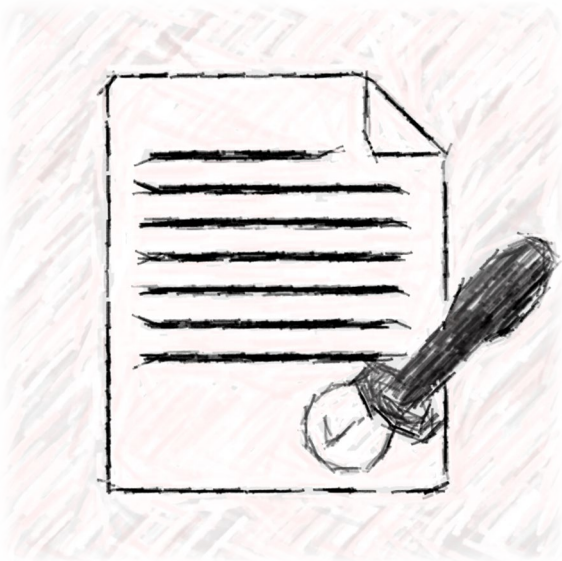
When **non-compliance** of supplies from a certain country is frequent, EU authorities can impose **additional controls** from that country.

Products from countries that have shown repeated non-compliance are put on a list included in the Annex of Commission Implementing Regulation (EU) 2019/1793.

Visit the RASFF Portal to see product rejections and causes.

Quality requirements

Since food safety is a major concern, European importers often demand **more than only legal requirements**, in order to signalize their customers compliance with food safety and good quality.

+ For **product-specific requirements** regarding quality, maturity, sizing, presentation and packaging, you may take a look at the [United Nations Economic Commission for Europe (UNECE) Standards](#).

+ Additionally your (potential) importer may have its own product specifications which you mutually agreed upon to comply with.

Quality requirements

Furthermore, many importers expect from their suppliers that they comply with **additional voluntary certifications**:

Almost all importers require **compliance with** GLOBALG.A.P., which has made the certificate almost obligatory for the export to the EU.

+ To obtain a GLOBALG.A.P. certificate, hire an **accredited and reputable Certification Body**. You can look for Certification Bodies in your region in the database with GLOBALG.A.P. approved Certification Bodies.
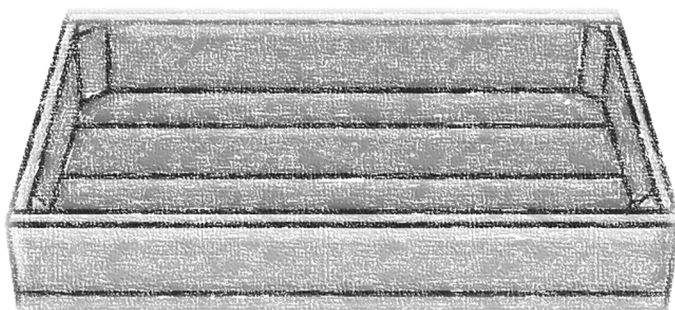
Packaging requirements

Packaging often depends on the **customer's demand**.

However, every importer will demand packaging materials that are:

+ **Free from damage and clean**: Packaging material may also be a source of contamination. To prevent it, use always clean and proper materials and test them for possible contamination.

+ **Adequate for the product:** Use packaging materials that ensure that the products arrive on the destination market as fresh and intact as possible.
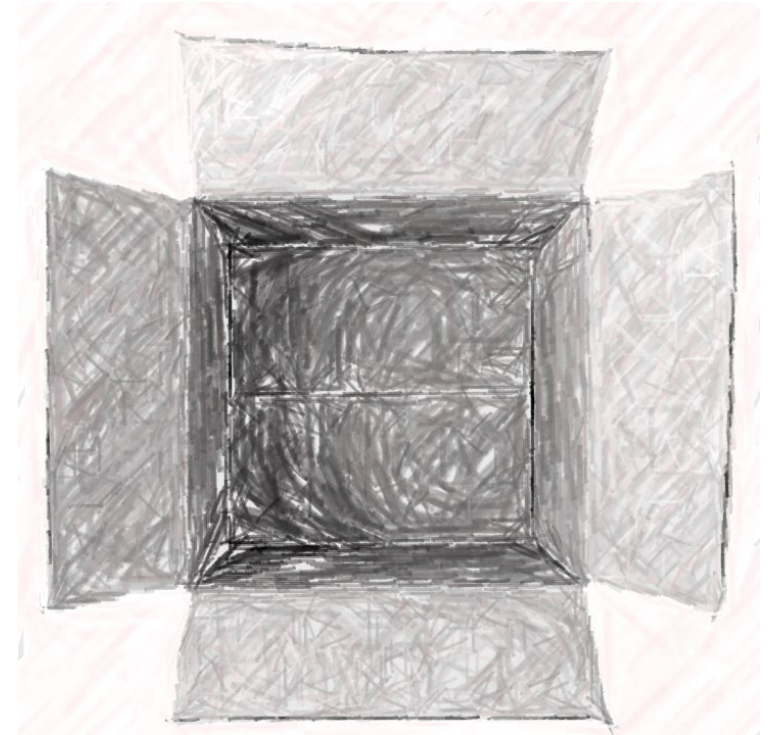
Packaging requirements

Packaging is ruled under [Regulation (EC) 1935/2004](#) **on materials and articles intended to come into contact with food,** in order to protect human health.

+ Such materials shall be manufactured in compliance with **good manufacturing practice** according to [Regulation (EC) No 2023/2006](#), which postulates the implementation of a documented quality assurance and control system, so that the materials do not transfer their constituents to food in quantities that exceed the permitted limits.

+ The **traceability of materials and articles** shall be ensured at all stages in order to facilitate control and the recall of defective products.
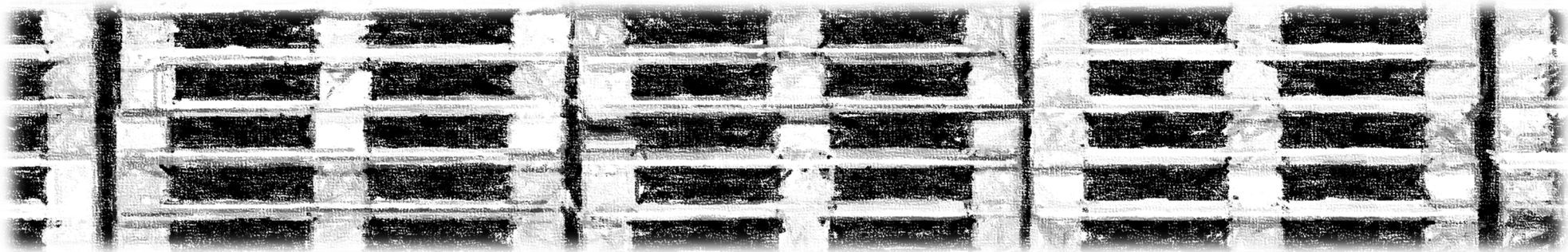
Packaging requirements

If you package with **plastic**, pay attention to:

+ The **authorised substances** set out in Annex I of [Regulation (EU) No 10/2011](#) to be intentionally used in the manufacture of plastic layers in plastic materials and articles.

+ The **specific migration limits (SML)** also set out in Annex I, specifying the maximum permitted transfer quantities of plastic constituents to foods.

Packaging requirements

If you package with **pallets**, pay attention to:

+ The [International Standards for Phytosanitary Measures (ISPM) 15](#) (of the [International Plant Protection Convention – IPPC)](#) on international trade with wood packaging material made from raw wood (crates, boxes, packing cases, dunnage, pallets, cable drums and spools/reels).

+ [Regulation (EU) 2016/2031](#) on protective measures against plant pests, which based on the ISPM 15, sets the requirements for non-EU imports into the EU of wood packaging material.
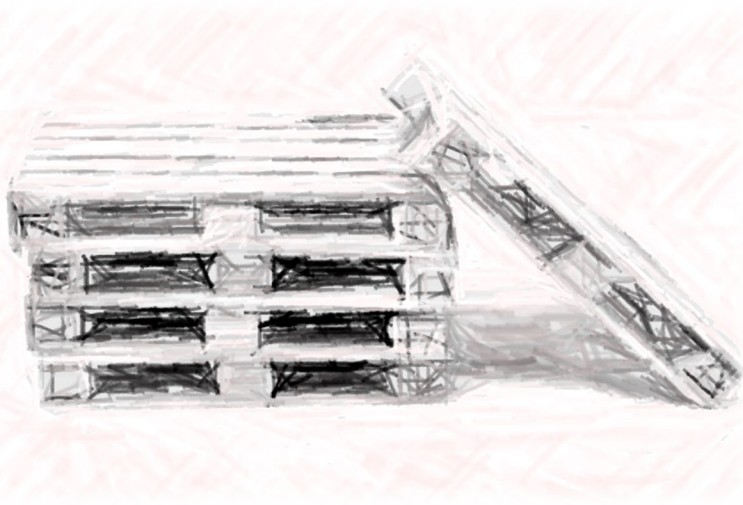
Packaging requirements

According to both regulations, pallets must be:

+ **heat treated or fumigated** to kill insects or fungus conforming to EU organic rules. The heat treatments must meet the parameters specified in Annex I of the ISPM 15.

+ marked with the **ISPM15 stamp** consisting of 3 codes (country, producer and measure applied) and the **IPPC logo.**

For regulations on other types of materials for food packaging see the section of "Food packaging and containers" on the website of the Summaries of EU legislation.

Packaging requirements

Eco-friendly packaging

Consumers increasingly try to buy products that are packed with **less plastic**, since plastics made from non-renewable resources such as oil are seen as a threat to the environment.

+ Importers may demand alternative packaging materials. Try switching to **paper-based or starch-based bioplastic** packaging solutions.

Furthermore, the **carbon footprint** of products is becoming a major concern.

+ Try using **efficient packaging** to minimize energy emissions in transportation (you may also optimize production processes).
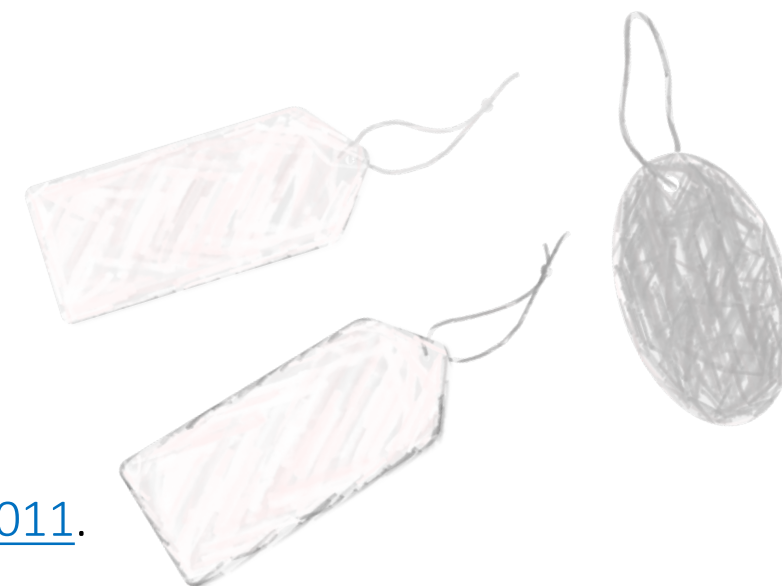
Labelling requirements

The labelling of your products must comply with the requirements of:
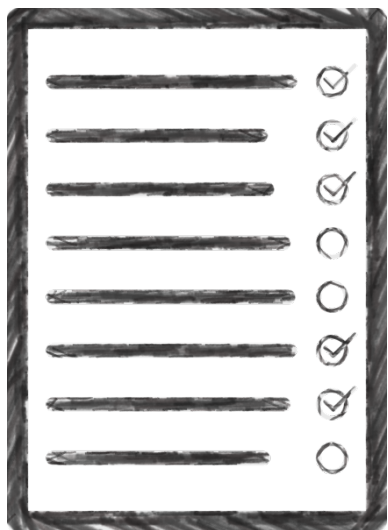
+ EU legislation

+ Your purchaser

General labelling requirements are laid down in Regulation (EU) 1169/2011.

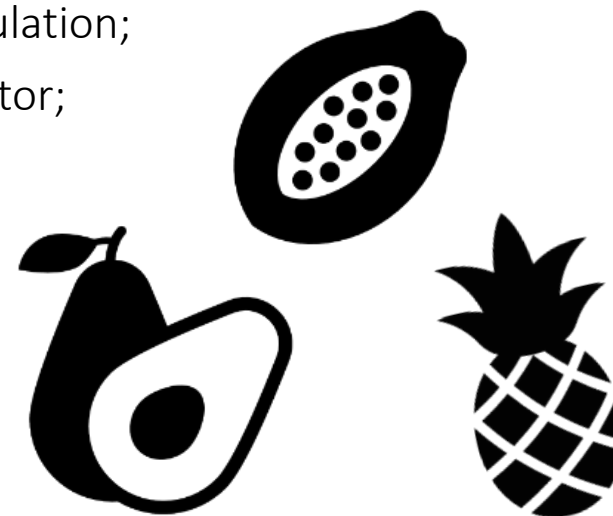+ However, there are specific rules which are applicable to specific products.

Labelling requirements

According to the **general labelling requirements** of the EU, the following information must be stated on the product label:

✓ The name of the food (legal name). Specific provisions on the name of the food are laid down in Annex VI to the Regulation;

✓ Business name and address of the food business operator;

✓ Net quantity;

✓ Country of origin;

✓ Storage conditions;

✓ Standard/class;

✓ Variety

For additional labelling requirements for categories of products see the EU Trade Helpdesk.
For product-specific labelling requirements see the EUR-Lex summaries of EU legislation.

Labelling requirements

Organic label:

Your produce can be marketed as organic in the EU only if it complies with the European Union regulation for organic production and labelling (Council Regulation (EC) 834/2007 and Commission Regulation (EC) 889/2008). Only then you may print the **European Union's organic logo** on your products.

+ New Regulation (EU) 2018/848 will replace Council Regulation (EC) 834/2007 from January 1st 2021.

+ See the IPD Guide on Organic Certification for more information on how to implement an organic production system.

Labelling requirements

For more information on labelling, packaging and quality of your products, please refer to the Codex Alimentarius Standards.

However, some retailers demand additional certifications (e.g. the German Bio-Siegel). Discuss with your buyers which labels they require.
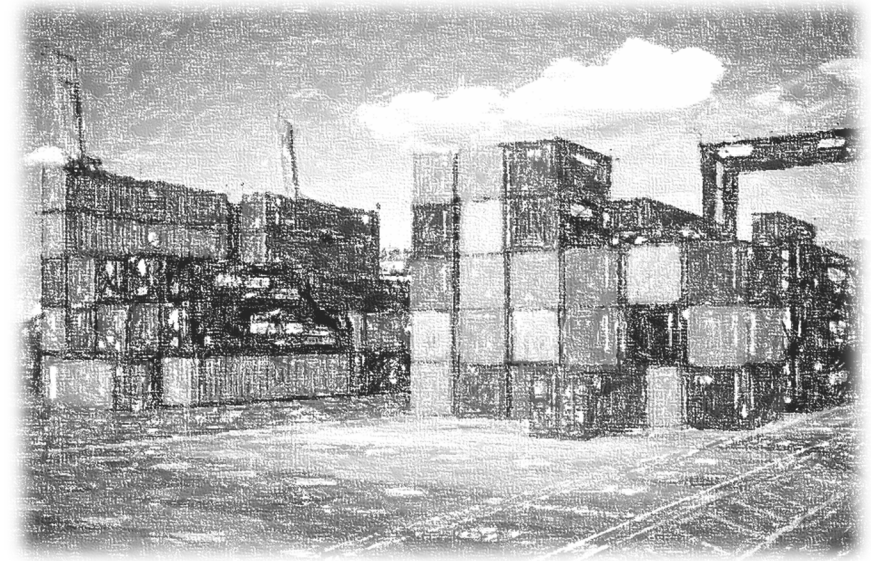
Cargo requirements

Prior to shipment

Make sure you comply with all the requirements that your customer demands. The best thing to do is to make a checklist, such as the following:

+   Send the booking confirmation

+   Mention the order number in all documentation for shipment

+   Check the terms of sale

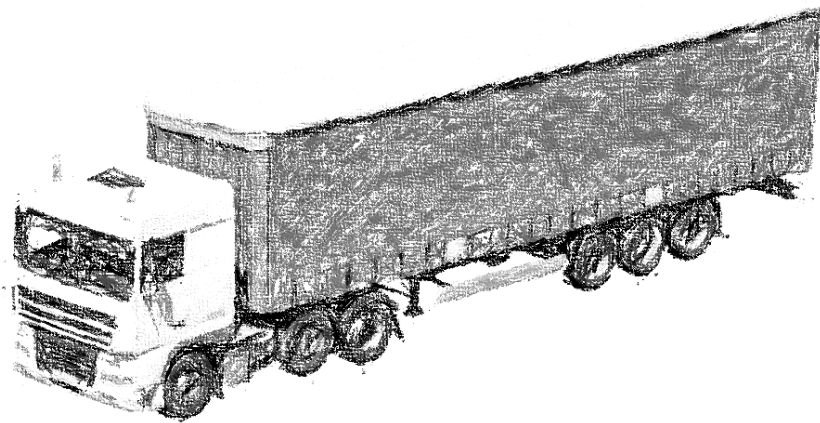Adapt the checklist to the requirements of your customer.

Cargo requirements

Preparation of the container

Many importers demand that the transport, cleaning and disinfection comply with the GMP+ standard.

+ Do not fumigate the container with toxic chemicals that are not conform to the EU organic rules. You are only allowed to use CO_2 or nitrogen for pest control.

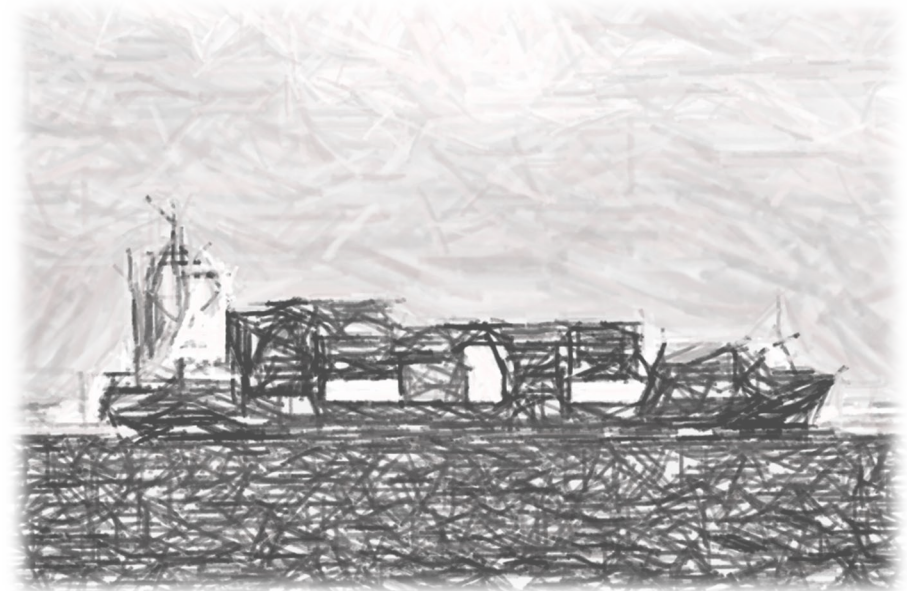Furthermore, condensation water can increase the risk of damages.

+ Try placing moisture absorbing material on the cargo or under the container roof, e.g. carton.

+ If your load needs to be palletized, place a cardboard between product and pallet.

+ Make sure that bags do not overhang, or boxes do fit 100% on the pallets.

+ Chose high quality cardboard materials resisting alterations by humidity

Cargo requirements

Shipping documents

Importers commonly ask for following shipping documents:

+ Bill of Lading or Express Cargo Bill

+ Commercial Invoice that includes:
  + Information on the exporter and the importer (name and address)
  + Date of issue
  + Invoice number
  + Description of the goods (name, quality, etc.)
  + Unit of measure
  + Quantity of goods
  + Unit value
  + Total item value
  + Total invoice value and currency of payment. The equivalent amount must be indicated in a currency freely convertible to Euro or other legal tender in the importing member state
  + The terms of payment (method and date of payment, discounts, etc.)
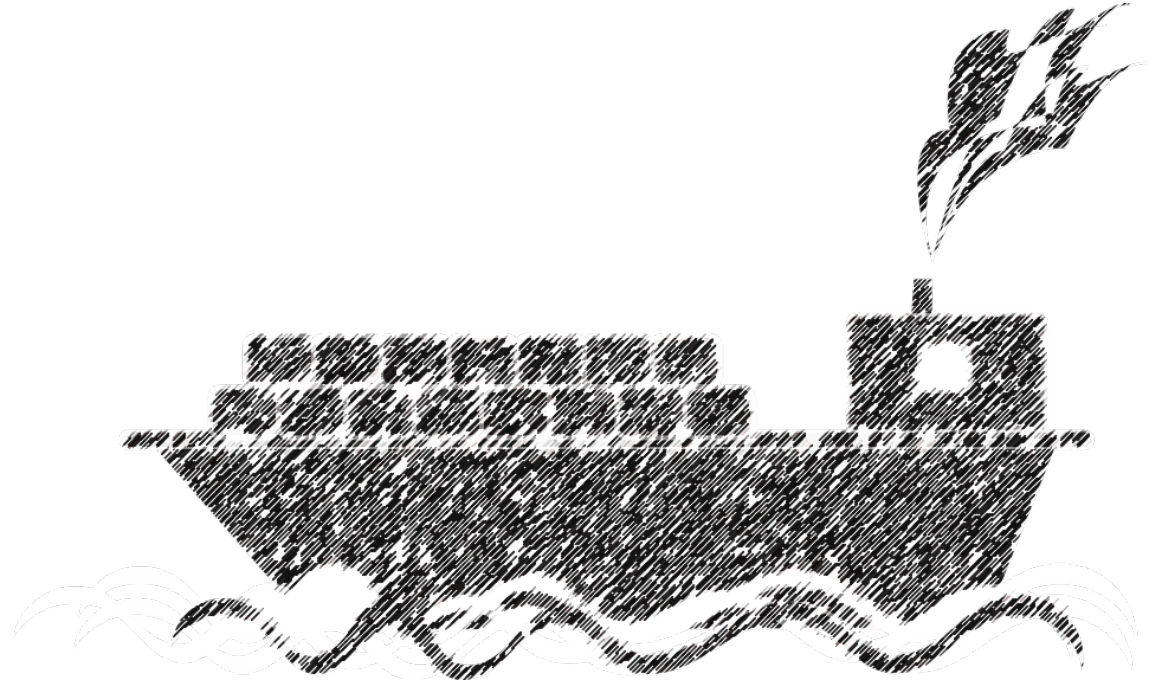 + The terms of delivery according to the appropriate Incoterm
  + Means of transport

Cargo requirements

Packing List that includes:

+ Lot identification

+ Number of packages / size of packaging

+ Exact item declaration

+ Container Number

+ Certificate of Origin

+ Phytosanitary Certificate

+ If wooden pallets are used: Wood Packaging Certificate

Cargo requirements

+ Precise currency and Incoterms with your buyer: USD / EUR; CFR, FOB, CIF, DDP, etc.

+ Comply with EDA / EDD (expected date of arrival/_ _delivery)

+ Make sure to work with a serious cargo line bound in in a worldwide net

+ Try to get an as direct as possible shipping between departure- and destination- harbour.

+ Avoid transboarding, so you gain extended shelf life for your product = ! sales argument !

+ Opt for Controlled Atmosphere, CA- Containers

+ Indicate by written to your forwarder about max./min. temperatures during transport

+ Put at least 3-4 temperature trackers in the container

+ Supervise correct loading and sealing of container

+ Take photos when loading, sealing the container

Sustainability requirements

+ Awareness about the environment and working conditions is growing among European consumers. Consequently, importers are demanding more and more evidence from their suppliers about eco-friendly processes and good working conditions among the value chain.

+ Greater transparency is expected regarding the traceability as well as sustainable and ethical production methods.

+ Although not obligatory, participation in sustainability schemes is becoming more important to enter the European market.

Sustainability requirements

Concerns among consumers about sustainable production are increasing. Organic certification is on the environmental side the highest standard among some importers. But sustainability is also about general environmental issues improving social aspects and working conditions. Some frequently required scheme are GRASP, a voluntary GLOBALG.A.P. add-on module that assesses social practices on the farm (workers' health, safety and welfare). An important player working on the globalization of environmental and social standards for the whole value chain is AMFORI. www.amfori.org => guidelines for self assessments.

Niche products still do not face as much competition as non-niche products. Thus, retailers are less strict with participation in organic certification or other sustainability schemes. However, it is going to become more common in the next years.

Sustainability requirements

Sustainability embraces many aspects. All of the following areas may provide evidence for your potential customers that you are working on sustainability improvements:

+ Rain- and/or waste water management

+ Energy saving processes (improving thermic isolation, cleaner motors, etc.)

+ Improving packaging materials , - processes

+ Strengthening biodiversity; overcoming environmental challenges; reducing frequency of agrochemical use in plant treatments

+ Community empowerment; facilitating and fostering individual/ personal growth (among children youth, women, in other social groups), etc.
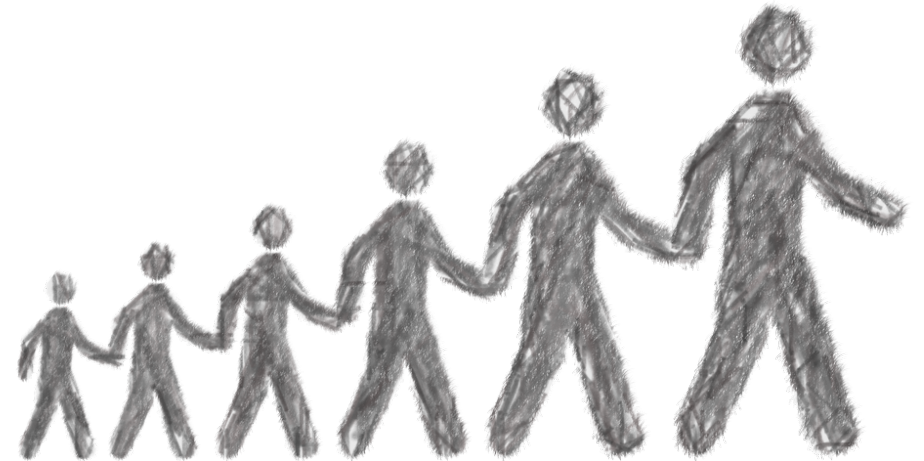
Sustainability requirements

If you are not yet ready to certify your produce, you can register your company on the Supplier Ethical Data Exchange (Sedex) platform, where you can share information about your production process with potential customers.

This way, you get to show your production process while making it easy for potential buyers to trace their supply chain.

Please check ITC´s Sustainability Standards Map for further information on different standards.

Information links of useful websites

For a list of requirements for your product consult the EU Export Helpdesk, where you can select your specific product code as well as your respective origin and export destination (e.g. Germany).

If you would like to get more information on import requirements, we recommend the following websites and links:

+ https://ec.europa.eu/food/sites/food/files/safety/docs/biosafety_fh_legis_guidance_interpretation_imports.pdf

+ https://eurlex.europa.eu/summary/chapter/consumers/0905.html?root=0905%20;%20http://www.jascal.com.my/988-2/

+ https://ec.europa.eu/food/safety/rasff_en

+ https://ec.europa.eu/food/sites/food/files/safety/docs/ia_ic_guidance_import-requirements.pdf

+ www.cbi.eu/market-information/fresh-fruit-vegetables

+ www.sustainabilitymap.org

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