



# Compliance with EU buyer requirements for spices and herbs

Buyer requirements are all the requirements you can expect from your EU buyer. They can be divided into two groups: legislation and additional, non-legal requirements.

## Legal requirements

Legal requirements are the minimum requirements which must be met by products marketed in the EU. Products which fail to meet these requirements are not allowed on the EU market. EU legislation sets the basis for legal requirements in the EU, but there may be some differences in the implementations into national legislation in the member states. This information is provided in Table 1. For information on other relevant national legislation, check the related documents on <http://www.cbi.eu/marketinfo>.

At the international level, the Codex Alimentarius adopted a Code of Hygienic Practice for Spice and Dried Aromatic Plants in 1995 (CAC/RCP 42-1995). This code establishes hygienic requirements in the production/harvesting area, in the company's design and facilities, for personnel hygiene, for hygienic processing requirements and the end-product specifications. This Code of Practice is available at: [http://www.codexalimentarius.net/standard\\_list.asp](http://www.codexalimentarius.net/standard_list.asp), and it is used as a basis for the EU legislation.

All food products in the EU must comply with the General Food Law (Regulation (EC) 178/2002), laying down the general principles and requirements of food legislation, establishing the European Food Safety Authority and laying down procedures in matters of food safety. It also includes provisions on the traceability of food.

EU legislation on Maximum Residue Levels (MRLs) of pesticides establishes the MRLs of pesticides permitted in products of animal and vegetable origin which are intended for human consumption. MRLs are relevant to many natural ingredients, including spices and herbs.

Furthermore, EU Directives 1999/2/EC (ionising radiation standards) and 1999/3/EC (list of foodstuffs and ingredients which may be irradiated) state requirements for using irradiation for the treatment of spices and herbs. At the moment, the only food categories allowed to be irradiated under EU legislation are: dried aromatic herbs, spices and vegetable seasonings. Member States may allow irradiation of other product groups: check with your (potential) importer client.

Other requirements presented here cover food ingredients at large, addressing issues such as presence of microbiological contamination, contaminants, nutritional properties, labelling and general marketing aspects.

The table below presents an overview of legal requirements applicable to spices and herbs. Make sure that you study this legislation and determine which requirements are relevant to your export marketing.

**Table 1 Overview of legal EU requirements for spices and herbs**

Legislation	Source	Brief description	More information	Member state implementation
Additives, enzymes and flavourings in food	Regulation (EC) No 1331/2008 No 1332/2008 No 1333/2008 No 1334/2008	The EU has set a list of additives and enzymes and a number of requirements for flavourings and their use in foodstuffs intended for human consumption.	<a href="#">EU legislation: Additives, enzymes and flavourings in food</a>	NA
Contaminants in food	Regulation (EC) 1881/2006	The EU food safety policy has set maximum levels for certain contaminants in specified products or product groups.	<a href="#">EU legislation: Contaminants in food</a>	NA
Extraction solvents for food	Directive 88/344/EEC	There are EU rules for the marketing and use of extraction solvents used in the production of foodstuffs and food ingredients.	<a href="#">EU legislation: Extraction solvents for food</a>	<a href="#">Member States overview: Implementation of EU legislation on extraction solvents for food</a>
Food contact materials	Regulation (EC) 1935/2004 Directive 84/500/EEC Directive 2007/42/EEC Directive 2002/72 EC Regulation (EC) 282/2008 Regulation (EC) 372/2007 Directive 78/142/EEC Directive 93/11/EEC Regulation (EC) 1895/2005 <a href="#">Directive 2008/39/EC</a>	The European Union has laid down rules for materials and articles coming into contact with food (including for example packaging) in order to prevent unacceptable change in the composition of the foodstuffs and to protect human health.	<a href="#">EU legislation: Food contact materials</a>	See link EU legislation
Food control	Regulation (EC) 882/2004 Regulation (EC) 669/2009	All food products entering the EU are subject to official controls to check whether the products are in compliance with the relevant food legislation. Some specific products are subject to an increased level of control.	<a href="#">EU legislation: Food control</a>	NA
Food labelling	Directive 2000/13/EC Directive 90/496/EC Regulation 1924/2006/EC Directive 2005/26/EC Directive 2007/68/EC	This document provides an overview of the legislation on general food labelling requirements applicable to all foodstuffs. In addition, it outlines requirements related to nutrition and allergens labelling.	<a href="#">EU legislation: Food labelling</a>	See link EU legislation
Food supplements (vitamins and minerals)	Directive 2006/125/EC Directive 2002/46/EC	The EU has established harmonised specific rules on vitamins and minerals in food supplements.	<a href="#">EU legislation: Food supplements (vitamins and minerals)</a>	See link EU legislation
General food law	Regulation (EC) 178/2002	Food safety is the key issue in EU food legislation. The General Food Law is the framework regulation in EU food safety legislation. The legislation also introduces requirements on traceability.	<a href="#">EU legislation: General food law</a>	NA
CASE: General product safety of	Regulation (EC) 178/2002	The EU introduced the European rapid alert system for food (and feed) products (RASFF)	<a href="#">EU legislation: Product safety for food products</a>	<u>NA</u>

food products		as a tool to exchange information on the enforcement of EU food safety legislation.	<a href="#">(cases)</a>	
Good manufacturing practice (GMP) for food contact materials	Regulation (EC) 2023/2006	The EU has developed Good Manufacturing Practice (GMP) for manufacturers of materials and articles intended to come into contact with foodstuff. It is not directly applicable to producers outside the EU. However, it may be indirectly relevant, because of buyers' demands for a quality system.	<a href="#">EU legislation: Good manufacturing practice (GMP) for food contact materials</a>	NA
Hygiene of foodstuffs (HACCP)	Regulation (EC) 852/2004	The EU legislation on hygiene of foodstuffs (HACCP) is legally binding for food processors, and is recommended for farmers (primary production).	<a href="#">EU legislation: Hygiene of foodstuffs (HACCP)</a>	NA
Irradiation of food	Directive 1999/2/EC Directive 1999/3/EC Decision 2002/840/EC	EU irradiation of food is permitted only in specific cases.	<a href="#">EU legislation: Irradiation of food</a>	<a href="#">Member States overview: Implementation of EU legislation on Irradiation of food (ionising radiation)</a>
Maximum Residue Levels (MRLs) of pesticides in food	Regulation (EC) 396/2005 Regulation (EC) 178/2006 Regulation (EC) 149/2008	In the EU, legislation has been laid down to regulate the presence of pesticide residues (MRLs) in food products.	<a href="#">EU legislation: Maximum Residue Levels (MRLs) of pesticides in food</a>	<a href="#">NA</a>
Microbiological contamination of food	Regulation (EC) 2073/2005	The EU has set microbiological criteria for food borne micro-organisms, their toxins and metabolites.	<a href="#">EU legislation: Microbiological contamination of food</a>	NA
Novel foods including traditional foods	Regulation (EC) 258/97 Recommendation 97/618/EC	The Novel Food Regulation covers foodstuffs that are newly developed by industry, but also "exotic" natural foodstuffs or ingredients which were not "consumed to a significant degree within the EU before 15 May 1997".	<a href="#">EU legislation: Novel foods including traditional foods</a>	NA
Nutrition and health claims on food	Regulation (EC) 1924/2006	The EU wants to prevent the misleading of consumers by allying the use of nutrition or health claims to certain conditions related to nutritional profiles of foods.	<a href="#">EU legislation: Nutrition and health claims on foods</a>	NA
Organic production and labelling	Regulation (EC) 834/2007 Regulation (EC) 889/2008 Regulation (EC) 1235/2008	The EU has established requirements on the production and labelling with which an organic product of agricultural origin must comply, in order to be marketed in the EU as "organic".	<a href="#">EU legislation: Organic production and labelling</a>	NA
CASE: Phytosanitary certificate	Directive 2000/29/EC	According to EU legislation, a phytosanitary (plant health) certificate must accompany some species of plant or plant products exported from non-EU countries to the EU.	<a href="#">EU legislation: Phytosanitary certificate (case)</a>	<a href="#">NA</a>
<b>National additional legislation</b>				
Germany: Contaminants in food	Order, on the maximum permissible quantities of contaminants in foodstuffs, of 2003 and its amendments	In addition to EU restrictions on contaminants in food, Germany has laid down limits for certain other contaminants in food, namely mercury, solvents and PCBs.	<a href="#">Germany legislation: Contaminants in food</a>	NA

United Kingdom: Contaminants in food	Chloroform in Food Regulations (1980) Arsenic in Food Regulations (1959) Report of the Food Standards Committee on Copper (1956)	In addition to EU restrictions on contaminants in food, the United Kingdom has laid down limits for certain other contaminants in food, namely copper, arsenic, zinc and chloroform.	<a href="#">UK legislation: Contaminants in food</a>	NA
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### Non-legal requirements

Additional, non-legal requirements reach beyond legislation, as companies can go further in their requirements than legislation. The main categories of additional requirements are environmental requirements and social (labour) requirements. In the case of spices and herbs, these requirements include organic and Fair Trade certifications. Understanding the certification schemes applicable to the different spices and herbs is an important step to access the EU market. For further information on these certification schemes, some of the sources which can be consulted are:

- EU Organic Farming - <http://ec.europa.eu/agriculture/organic>
- Ecocert - <http://www.ecocert.com>
- Fairtrade Labelling Organisations International (FLO) - <http://www.fairtrade.net>

For more information on non-legal requirements, check the related documents on <http://www.cbi.eu/marketinfo>.

In addition, the European Spice Association (ESA) has set its minimum requirements for spices, supplementing the EU legislation on spices and herbs. ESA's Quality Minima Document can be found under 'Documents' at: <http://www.esa-spices.org>. Furthermore, the International Pepper Community provides details on its hygiene and general quality standard requirements for white and black pepper, which can be found under 'Technical' at: <http://www.ipcnet.org>.

Additional information on packaging can be found at the website of ITC on export packaging: <http://www.intracen.org/ep/packaging/packit.htm>.