

EU Traceability, Labelling and Marketing Requirements

PROGRESS regional training webinar

**“Strengthening the capacity of fruit and berry producers in the
Eastern Partnership (EaP) to access the EU market”**

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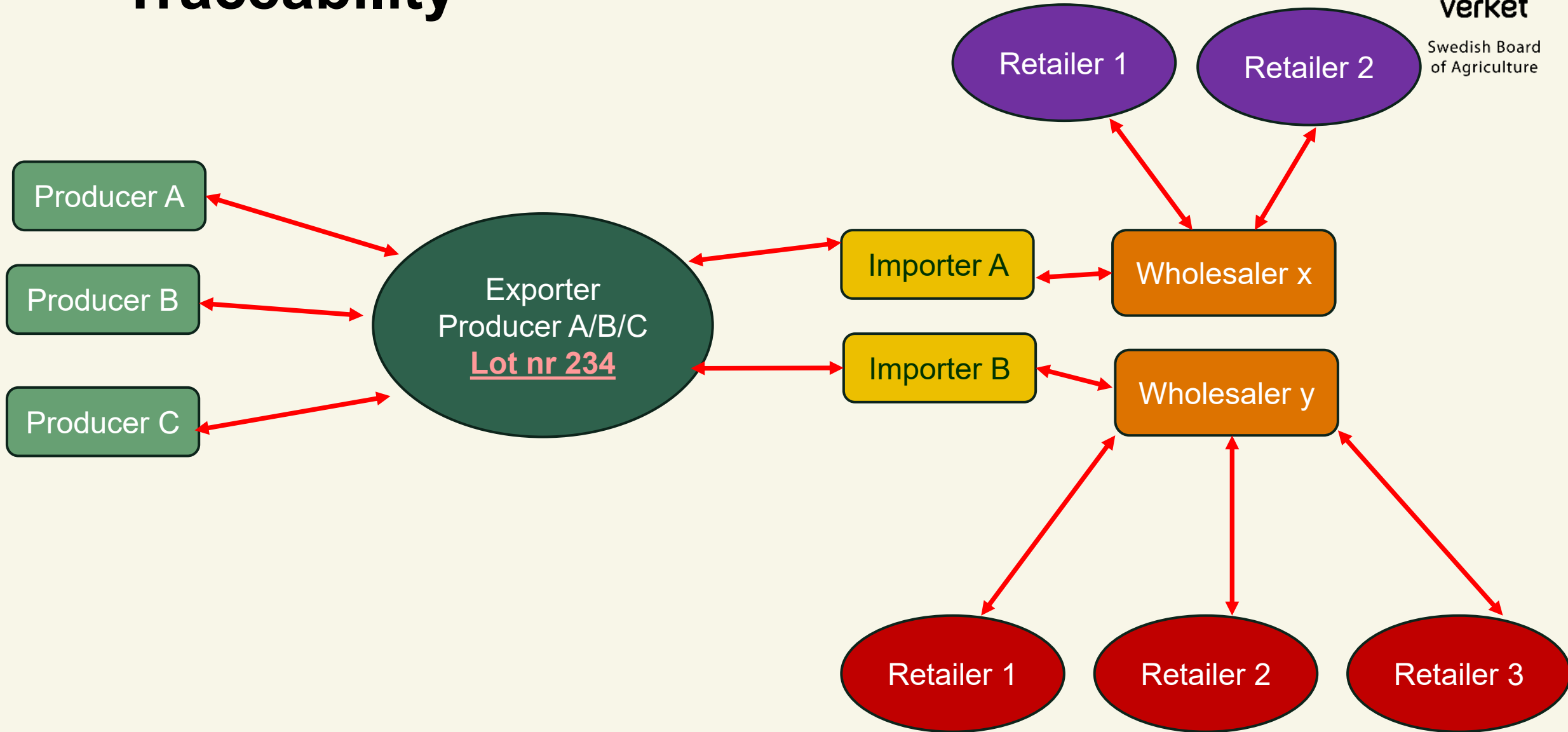
Agenda

- Traceability requirements
- Marketing requirements
- Labelling requirements

Traceability requirements

- EU food law Regulation (EU) 178/2002 article 18
- Requirement to identify one step behind and one step forward
 - The supplier of each product they have acquired
 - The receiver of each product they have supplied
- Food operators must have a system of record keeping that ensures this information is available throughout the chain
 - Keep records for five years
- Lot numbers are essential

Traceability



Record keeping (five years)

- Each parcel (area in the orchard) and each lot identified needs a separate entry
- Any activity of relevance for the final product
 - Date of sowing or planting (if relevant)
 - Dates of flowering and temperature during flowering
 - Fertilisation (what and when)
 - Any treatment used in plant protection or weed management)
 - Date
 - Substance and strength
 - Means of use
 - Harvest date and weather
 - Storage information – dates, temperature, CA-regime if relevant

Special challenges for smallholders

- Record keeping
 - Every day – enter at the end of each day
 - Identifying lots – marking lot numbers on boxes/ packages
 - Connecting lots with data

Two groups of marketing requirements (both must be met)

Legal EC requirements

1. Phytosanitary
2. Food safety
 - a. pesticide residues
 - b. microorganisms
 - c. traceability
3. Marketing standards
4. Labelling

Traders' additional requirements

5. Communication
6. Certification
 - a. Of production
 - b. Of packing facility
7. Traceability
8. Varieties
9. Pesticide levels
10. Quality
11. Maintaining a cool chain

If any one of these requirements is not met at the point of entry into the EC, products will not be allowed to enter the EC market

Traders' additional requirements have to be met in order to secure a business deal, and in order to continue to sell to the same buyer

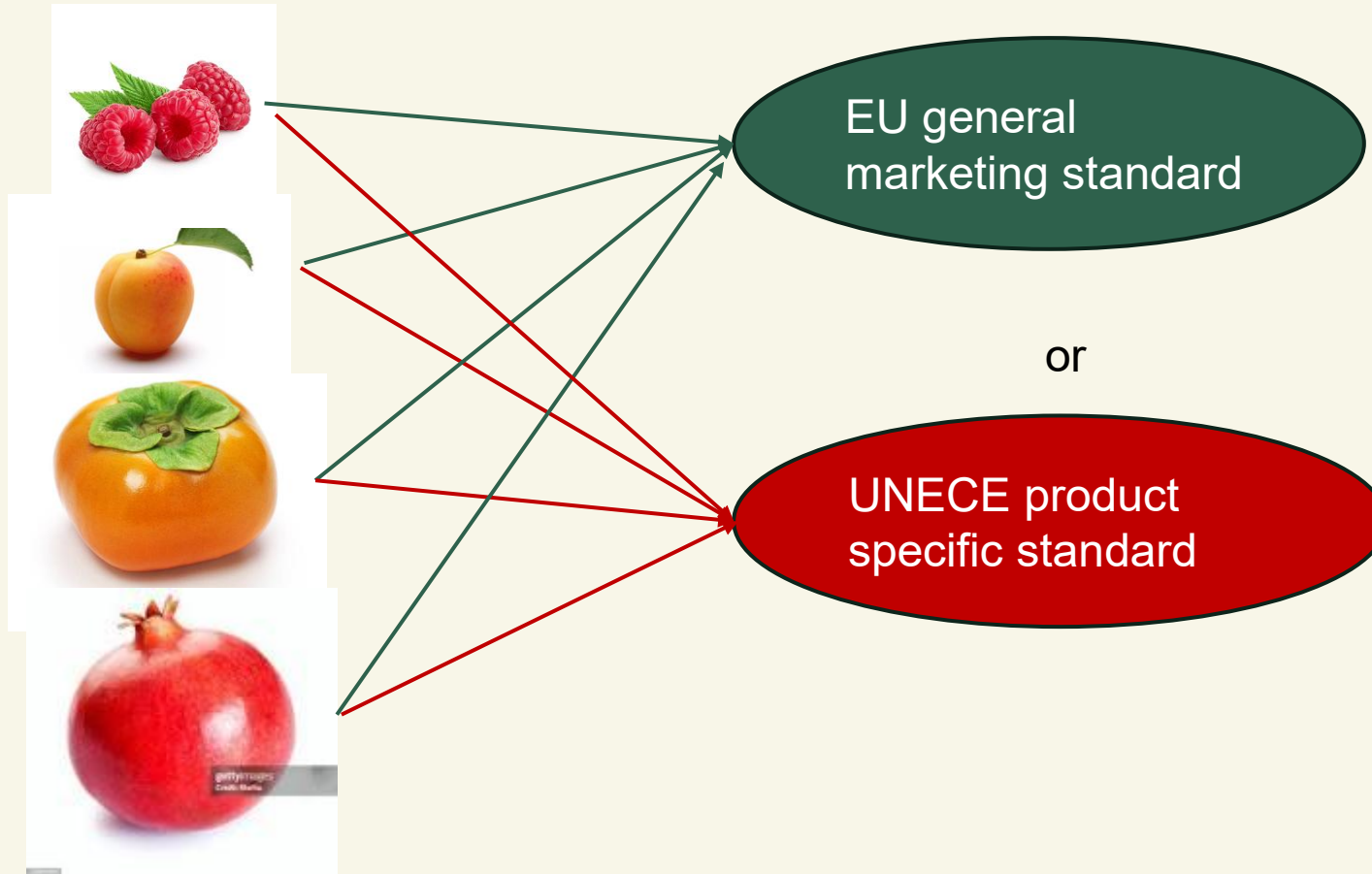
EU has 10 + 1 product specific marketing standards

- Apples
- Citrus fruit
- Kiwifruit
- Lettuce
- Peaches and nectarines
- Pears
- Strawberries
- Sweet peppers
- Table Grapes
- Tomatoes
- (Green bananas, the standard is only applicable for unripe bananas)



EU product specific
standard
(identical with)
UNECE product
specific standard

Other products (two alternatives)



Product specific standard

- Definition of product
- Quality requirements
 - Minimum requirements
 - Maturity requirements
 - Classification
- Sizing
- Tolerances
 - Quality tolerances
 - Sizing tolerances
- Presentation
 - Uniformity
 - Packaging
- Labelling requirements

General marketing standard

Minimum requirements
Maturity requirements

Tolerances

Labelling requirements

Requirements in Marketing standards

- Minimum requirements
 - Intact, sound, clean
- Classification requirements (only in product specific standards)
 - Class Extra, I and II
- Sizing (only in product specific standards)
 - Diameter, weight or number of fruit
- Tolerances
 - 0,5, 1 and 2 % for minimum requirements
 - 5 %, 10 % and 10 % for class requirements
 - 10 % for sizing requirements
 - Total 10 % tolerance in General Marketing standard
- Presentation (only in product specific standards)
- Labelling

Special challenges for small-holders

- Ensuring uniformity in size and quality
 - In order to be able to export products some kind of cooperation is necessary either by participating in a cooperative, a producer organisation or delivering to a private packer and exporter
 - Large buyers usually ask for a specific size
- Private standards
 - Additional quality requirements, often specific for each buyer
- Try to get the buyer to accept that the common marketing standard is used as a basis for the business agreement throughout the delivery chain

EU labelling requirements for fresh fruits and berries

What is the legal basis for these requirements? (Where do I find the rules?)

- Council Regulation (EU) 1308/2013 establishing a common organisation of the markets in agricultural products
 - article 75. 1 (c)
 - article 76
- Commission Delegated Regulation (EU) 2023/2429 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards marketing standards for the fruit and vegetables sector, certain processed fruit and vegetable products and the bananas sector,
 - article 3
 - article 5.1 (b)
 - article 6
 - Article 8
 - Annex I Marking requirements are set out in each of the Marketing standards of Annex I

Product specific standards

Labelling requirements include

- Identification of packer or dispatcher (sender)
- Nature of produce (what is in the box or package?)
- Origin of produce (where do they come from)
- Commercial specifications (Quality grade and size)
- Control mark (optional)

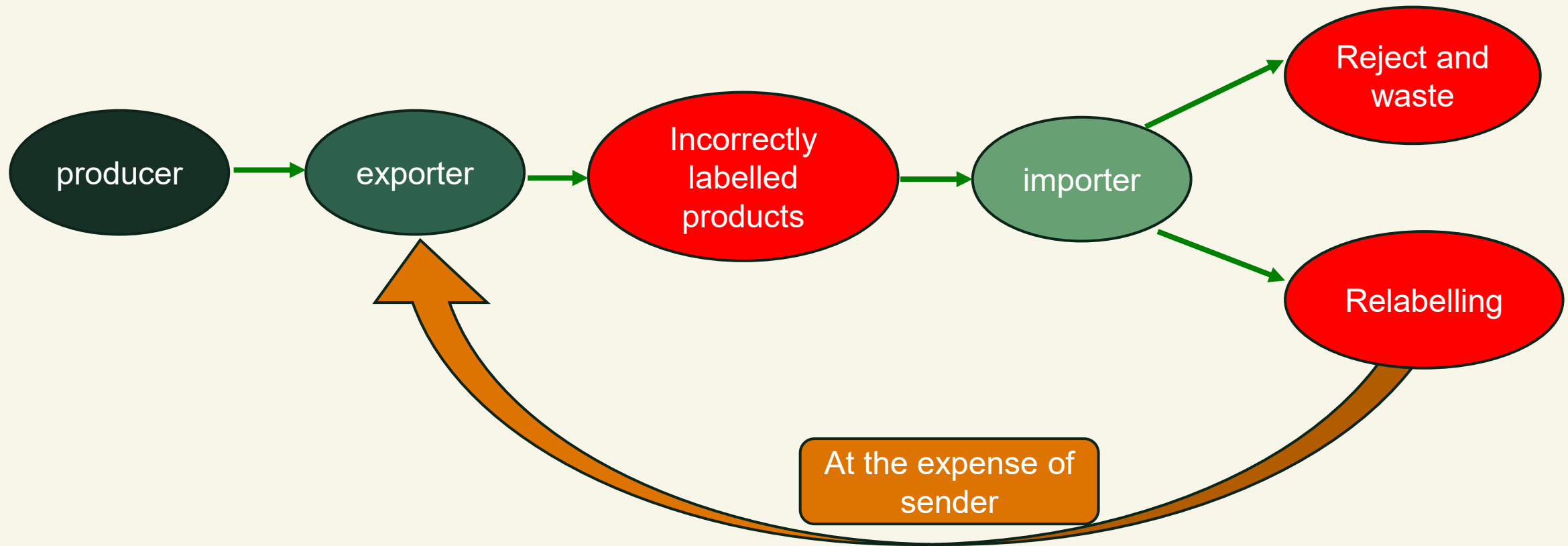
General marketing standard

Labelling requirements include

- Identification of packer or dispatcher (sender)
- Origin of produce (where do they come from)

Correct labelling reduces waste

- Products must have correct labelling/markings



Identificaton

All packages

Name and physical
address of the **packer
or dispatcher**

Street

City

Region

Postal Code

Country

Alternative for non-
prepackages

Packer and/or
dispatcher:

Country Code and

Official code mark
representing packer
and/or dispatcher

Listed in UNECE

Alternative for
prepackages

Name and physical
address of **a seller**
established in the EU

Packed for:

Street

City

Postal Code

Country

And a code that
identifies the packer

Name and
physical address:

Street
City
Region
Postal Code
Country

or

Packer or
dispatcher:

and

Official Code mark
for packer or
dispatcher

Marking a box with sender (packer or dispatcher)



Dispatcher

EXPORTED BY COLORS

VARIETY:

RUBY NEL

DIAMETER

DIAMETER

50-55 mm

A

CODENO:

3165

CLASS 1

PRODUCE OF
SOUTH AFRICA

PLUMS

STONEFRUIT

EXPORTED BY:

COLORS TRADING (PTY) LTD

PO BOX 499 · PAARL 7620

SOUTH AFRICA

TEL +27 21 807-5000 FAX +27 21 807-5001

Colors

104

Labelling consumer packages with sender

Name and
physical address
of packer or
dispatcher:

Street
City
Region
Postal Code
Country

or

Packed for:
Name and physical
address for a seller
established in EU
+
A code for the packer

Closed consumer package (pre-package) – must be marked



Closed consumer package (pre-package) – must be marked



Open consumer package (not a pre-package) – does not have to be marked
But the box in which they are placed must be marked



Labelling with origin – is required for

- The 11 products with EU product specific standards
- Products covered by the General marketing standard
- Products covered by a specific standard or the general marketing standard – **but** cut, shredded or chopped – so that they are not covered by the standard

Country of origin

The country where products have been grown

However, operations like washing, grading, shelling, trimming, cutting, grounding, blanching and packaging do not qualify as substantial processing that confers origin.

Marking mixes

- Packages of less than 10 kilos with mixes of products can be marked with
 - EU
 - Non-EU
 - EU and non – EU
- Must always reflect the content.

An example:

a mixture of

- *Apples from South Africa*
- *Pears from France*

- Two alternatives

Origin.

Apples - South Africa
Pears - France

Origin.

Products from EU and Non-EU

Nature of produce

- The product (if not visible from the outside)
- Variety (if required by the standard)
 - Trade name but only together with the variety

Additional requirements as required in specific standards (for example)

- Flesh colour (f.ex. grapefruit)
- Miniature (where appropriate) (f.ex. apples)
- Grown under protection

Commercial specifications

- Class (Extra, I or II)
- Size or number of fruit (according to standard)

Marking example

apples

Apples from Sweden
variety Cox Orange
Cat I
70-90 g

Packer:
John Sand apples
Fruktvägen 22
SE-245 16 Bohaga
Sweden

Apples from Sweden
variety Cox Orange
Cat I
70-90 g

Packer:

www.johnsand.com

Packer:

0046702643289

Challenges and how to meet them

- Is the labelled information correct?
- Is it visible enough?
- Is the text large enough?
- Strategy – good communication
 - Exporter communicates with buyer/ importer and provides examples
 - Information received from importer is communicated to producer

Some useful links

OECD interpretation material

<https://www.oecd.org/en/topics/fruits-and-vegetables.html>

UNECE trade standards

<https://unece.org/trade/wp7/FFV-Standards>

Code of good practise for fresh fruits and vegetables – along the value chain

<https://unece.org/trade/publications/code-good-practice-food-loss>

CODEX standards for fresh fruits and vegetables

<https://www.fao.org/fao-who-codexalimentarius/committees/committee/related-standards/en/?committee=CCFFV>