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Report Highlights:

This report is an addendum to the GAIN report number E42025-0004 EU Food and Agricultural Import Regulations and Standards (FAIRS) Report. It lists the Dutch import regulations and standards that are not harmonized within the EU or where the Netherlands varies from the EU standards.

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DISCLAIMER:

This report was prepared by the Office of Agricultural Affairs in The Hague, for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate because policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped. FINAL APPROVAL OF ANY PRODUCTS IS SUBJECT TO THE IMPORTING COUNTY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY.

Executive Summary:

This Food and Agricultural Import Regulations and Standards (FAIRS) Subject report was prepared by the Office of Agricultural Affairs in The Hague (FAS/The Hague). While the EU FAIRS report provides an overview of food and feed legislation currently in force for the European Union (EU), this report lists the Dutch import regulations and standards that are not harmonized within the EU or where the Netherlands varies with the EU. The report must therefore be read in conjunction with the GAIN EU FAIRS report. The most recent available version at this date of publication is E42024-0031 EU Food and Agricultural Import Regulations and Standards (FAIRS) Report, November 01, 2024. The sections below are numbered to correspond to the numbers in the GAIN EU FAIRS Report.

For U.S. agricultural, forestry, fishery and food-related exports, the Netherlands is the gateway to the European Union (EU). In 2024, the United States was the sixth largest supplier of agricultural and related products to the Netherlands, with imports valuing $3.5 billion. This was a seven percent decrease compared to the previous year, mainly due to fewer imports of soybeans and wood pellets. The main agricultural and food products imported from the United States were tree nuts, distilled spirits, soybeans, seafood, and ethanol in 2024.

Most, but not all, Dutch food legislation is harmonized at the EU level. However, imported products must meet existing Dutch requirements in cases where EU regulatory harmonization is not yet complete or absent. Additional national measures or options exist for reserved names for certain foodstuffs, choice of language, precautionary allergen labeling, voluntary nutrition declaration, use of stickers, samples,

voluntary non-GM labeling, alcohol free or light beers, labeling requirements related to the Dutch deposit scheme for beverage cans, special use foods, vegetarian and vegan products, packaging waste management, food contact materials, additives, enzymes, processing aids, fortified foods, food supplements, irradiated foodstuffs, and voluntary labeling of vegetarian or vegan products.

FAS/The Hague recommends interested parties to also read the Netherlands Food and Agricultural Import Regulations and Standards (FAIRS) – Certification Report. This, and all other reports can be downloaded at: https://gain.fas.usda.gov/#/.

Section I. General Food Laws

The Netherlands
As a member of the EU, the Netherlands conforms to all EU regulations and directives. EU Regulation 178/2002 (General Food Law) is the harmonized regulation that sets out the general principles and requirements of the EU's harmonized food law. The Dutch Food and Drugs Law is called "Warenwet" (in Dutch), elaborates on underlying decrees and acts. Together they form the Dutch regulatory framework for all food and non-food products, which applies to both domestically produced and imported products. Revisions of the Dutch Food and Drugs Law are published in the "Staatscourant" (where all other Dutch legislation is published as well). A structured overview of all EU food law as well as Dutch food regulations, is available through https://www.nvwa.nl/documenten/levensmiddelen/overzichten/wetten-en-regels/levensmiddelen-en-diervoeders/wetten-en-regels-voor-levensmiddelen-en-diervoeders (in Dutch).

The Netherlands Food and Consumer Product Safety Authority, known in Dutch under its acronym NVWA, monitors animal and plant health, animal welfare, the safety of food and consumer products, and enforces nature legislation. The NVWA is an independent agency in the Ministry of Agriculture, Fisheries, Food Security, and Nature and a regulatory agency for the Ministry of Health, Welfare, and Sport. NVWA contact details can be found in Appendix I and online.

If you are a U.S. interested party, or doing business with one, and need further assistance, please contact FAS/The Hague via agthehague@usda.gov.

Section II. Labeling Requirements

A. General Requirements
Per the EU, the standard U.S. label on food products fails to comply with EU labeling requirements. The "Food Information to Consumers (FIC)" Regulation (EU) 1169/2011 outlines the requirements for labels of pre-packaged food and drink products marketed in the EU, including those imported from non-EU countries. Details of these overarching EU labeling requirements may be found in section II of the GAIN EU FAIRS report. The Dutch Food Information Act Decree, furthermore, contains a small number of additional national stipulations.

1. Compulsory Information
The Netherlands follows Regulation (EU) 1169/2011 for labeling requirements. However, in relation to the name of the food on the label, there are Dutch restrictions. Traditionally, some names of food products have been reserved for foods complying with composition requirements.

See the below Dutch Warenwetbesluit Gereserveerde Aanduidingen (in Dutch):

Food name in Dutch	English translation
Azijn	Vinegar
Mayonaise	Mayonnaise
Vruchtenwijn	Fruit Wine
Roomijs	Ice Cream
Mosterd	Mustard
Limonade/Frisdrank	Lemonade/Soda Beverage
Korenwijn	Grain Wine
Advocaat	Advocaat Liqueur
Vieux	Dutch Brandy
Kaviaar	Caviar

The decree also lists reserved names for beers. See detailed information in Section II, subsection B, under 5. Other Dutch decrees stipulating some reserved names for foodstuffs are Warenwetbesluit Zuivel, Warenwetbesluit Specerijen en kruiden, Warenwetbesluit Meel en brood, Warenwetbesluit Vlees, Gehakt en Vleesproducten (all in Dutch). These decrees relate to dairy, spices, herbs, flour, bread, and meat (preparations) respectively.

4. Language Requirements

Dutch is the required language for labels on products intended for the Dutch market. Additional languages on the label are permissible.

6. Allergen Labeling

As of January 1, 2026, a new regulation enters into force in the Netherlands, specifically relating to the practice of warning for potential allergens on a food label out of precaution. Before using precautionary allergen statements, food business operators must conduct an objective, science-based risk assessment to determine whether an allergen *is* or *is not* present in the foodstuff they produce. The "presence" of allergens should be determined by scientific threshold values, as presented in the new Beleidsregel Allergenenetikettering uit Voorzorg (in Dutch). An English-language guidance document, endorsed by the NVWA, may be found on the website of the Federation of the Dutch Food Industry (FNLI), https://fnli.nl/actueel/richtlijnendocument-geeft-bedrijven-handvatten-voor-het-nieuwe-allergenenbeleid.

There is currently no EU-harmonization on precautionary allergen labeling. The Dutch government introduced this legislation to improve the protection of allergic consumers from unintentional cross-contamination and to enhance the information provided to consumers. Businesses should ensure that their risk assessments and labeling practices meet the new requirements. To support businesses in this process, the Dutch NVWA provides an additional Q&A on their website, https://www.nvwa.nl/documenten/consument/eten-drinken-roken/allergenen/publicaties/vragen-en-antwoorden-pal.

7. Minimum Durability

Annex X to Regulation (EU) 1169/2011 sets out rules for the indication of the date of minimum durability, use-by date, and date of freezing. The use-by date must be indicated on pre-packed individual portions. The durability date AND the date of (first) freezing preceded by the words "frozen on" is required on labels of frozen meat, frozen meat preparations, and frozen unprocessed seafood products.

In English:	**In Dutch:**
The date of 'minimum durability' shall be preceded by the words:	
-'Best before'	-'Ten minste houdbaar tot'
-'Best before end'	-'Ten minste houdbaar tot einde'
The 'use by' date shall be preceded by the words:	
-'Use by'	-'Te gebruiken tot'
The date of 'freezing' or the date of 'first freezing' shall be preceded by the words:	
-'Frozen on'	-'Ingevroren op'

12. Nutrition Declaration

EU Member States may recommend the use of additional forms of expression or presentation on the nutrition declaration, per Article 35 of Regulation (EU) 1169/2011. There are therefore several voluntary front-of-pack nutrition labeling schemes in use - of which the Netherlands opted for "Nutri-Score". Nutri-Score uses a color-coded designation ranging from A (best nutritional quality, green) to E (poorer nutritional quality, red) (Picture 1).

Picture 1. The Nutri-Score front-of-pack nutrition label

Source: Nutri-Score Questions & Answers, March 17, 2025

For a background on Nutri-Score, please refer to the GAIN report NL2022-0014 Nutri-Score Labeling Takes hold in the Netherlands. As of 2025, Nutri-Score uses an updated algorithm, recognizing additional product groups, with a slightly different scoring system, see the Nutri-Score Q&A 2025. It is possible to calculate the Nutri-Score for different food products, with this tool (website in Dutch, tool in English).

Producers are not obligated to carry Nutri-Score on their products. If they want to do so, there is a registration process, and it will be mandatory for all products of that brand to carry a Nutri-Score. For further guidance the dedicated website of the Dutch government may be consulted, https://nutriscorevoorbedrijven.nl/ (in Dutch).

15. Use of Stickers

Packaged food products from the United States are often imported with a standard U.S. label and re-labeled in the Netherlands in order to meet the Dutch labeling requirements. Stick-on labels are accepted in the Netherlands.

16. Samples
Products from the United States that are not approved for export to the Netherlands and are used for research and diagnosis, pathogens, trade samples, or demonstration material purposes in the Netherlands can, in some cases, be granted an import exemption.

For animal and animal products, an import exemption can be requested by completing the following document (in Dutch). Additional information on requesting an import exemption can be found on the website of the NVWA (in Dutch).

For plants, produce, and plant based material, an import exemption can be requested by completing the following document (in Dutch). Additional information on requesting an import exemption can be found on the website of the NVWA (in Dutch).

The NVWA can be contacted at +31 882 232 233 or via completing the form should you have any questions about filling in the content of the import exemption document.

U.S. companies interested in sending samples to the Netherlands should consider contacting USDA's Foreign Agricultural Service in the Netherlands for guidance by sending an email to agthehague@usda.gov.

B. Other Specific Labeling Requirements
3. Labeling of Genetically Modified (GM) Foods
While there is separate EU legislation for the labeling of genetically modified food or food containing genetically modified ingredients, there is no EU-harmonized regulation for "non-GM," "GM-free," or similar labeling terms. Additional background on labeling might be found in the GAIN Agricultural Biotechnology Annual for Netherlands, NL2024-0017 Agricultural Biotechnology Annual.

In the Netherlands, food companies can, if they want, mention on their product label that a product is "produced without using genetically engineered technology" (in Dutch: "bereid zonder gentechniek"). This is only possible if a product complies with the requirements set out in Article 4 of the national regulation Warenwetbesluit Nieuwe Voedingsmiddelen en Genetisch Gemodificeerde Levensmiddelen (in Dutch).

4. Organic Food Labeling
Since January 1, 2022, Regulation (EU) 2018/848 governs the production and labeling of organic products. Under this Regulation, the EU-U.S. equivalency arrangement will expire on December 31, 2026. To avoid trade disruptions, all non-EU countries, including the United States, that are currently recognized as equivalent may renegotiate the terms and sign a Trade Agreement with the EU. Trade Agreements will aim to recognize that the non-EU country has a "system of production meeting the same objectives and principles by applying rules which ensure the same level of assurance of conformity as those of the Union." An October 4, 2024 European Court of Justice (ECJ) judgment clarified that it is prohibited to use the organic production logo of the European Union for products manufactured outside the EU according to rules merely equivalent to those laid down by EU law. However, such products may nonetheless bear the organic production logo of that third country.

5. Wine, Spirits, Beers, and Other Alcoholic Beverages
All alcoholic beverages must comply with allergen labeling requirements.

Since 2021, a compulsory nutrition declaration and list of ingredients for wines, aromatized wines, and dealcoholized and partially dealcoholized wines is required per Regulation (EU) 2021/2117. For further information, see Section II B-5 of the GAIN EU FAIRS report.

On March 28, 2025, a European Commission proposal for new wine labeling rules was published, addressing what constitutes an "alcohol free" or "alcohol light" wine, as well as EU harmonization for the (electronic) presentation of the compulsory nutrition declaration and list of ingredients. Current rules will apply until this proposal is adopted. For more information, see the GAIN report E42025-0004 EU Commission proposes an Update to Labeling Rules for Wine.

There is no specific EU-harmonized legislation for beer. Some Member States have adopted national provisions to make the list of ingredients compulsory. The Netherlands has not adopted such provisions. What may or must be included on a beer label (and what should not) is set out in the European labeling regulation, Regulation (EU) 2011/1169. The Netherlands has national rules in place on the names of beer. In order to use the designation "beer" on a label, the product needs to comply with Article 7b of Warenwetbesluit Gereserveerde Aanduidingen. In order for a beer to be labeled in Dutch "alcoholvrij" (alcohol free) or "alcoholarm" (alcohol light/low in alcohol) it has to comply with the definitions of Article 7c and 7d of Warenwetbesluit Gereserveerde Aanduidingen. Similar rules can be found in the same regulation for the names for (specialty) beers "oud bruin", "pils", and "bok/bock". The Dutch Brewers Organization provides a useful manual laying out all rules, which can be found here: https://www.nederlandsebrouwers.nl/biersector/publicaties/etiketteringshandleiding/ (in Dutch).

As of April 1, 2023, the Netherlands put a mandatory deposit scheme in place for beverage cans. It brings the labeling requirement to display a Dutch 'deposit logo' (Picture 2) and a 'European Article Number (EAN) code' on the can. The requirement also applies to imported cans; a stick-on label is acceptable. For a background on this Dutch deposit scheme for cans, see GAIN report NL2022-0067 Dutch Delay Implementation of a Deposit Scheme for Cans.

Picture 2. Dutch Deposit Logo for Cans

Source: https://www.verpact.nl/en/node/469

6. Special Use Foods
Special use foods in the European Union include infant formula, follow-on formula, food for special medical purposes, processed cereal based food and baby food, food for special medical purposes, and total diet replacement for weight control. For these foods, specific compositional, information, and labeling requirements apply, see the GAIN EU FAIRS report. With the exception of processed cereal-based food and baby food, these special use foods also require registration in each EU Member State. For the registration details for the Netherlands, see below section VI, subsection D.

7. Meat Labeling
Minced meat designations may only be used when specific requirements are met as detailed in Annex VI, Part B of Regulation (EU) 1169/2011. Alternatively, EU Member States may allow the placing on their national market of minced meat which does not comply with the criteria laid down in point 1 of Part B under a national mark that cannot be confused with the marks provided for in Article 5(1) of Regulation (EC) No 853/2004.

11. Vertical & Product-Specific Legislation
In May 2024, the Commission published Directive (EU) 2024/1438 which amends the "breakfast directives." Products which are placed on the market or labeled before June 14, 2026, in accordance with Directives 2001/110, 2001/112, 2001/113 and 2001/114 may continue to be marketed until the exhaustion of stocks.

One of the changes relates to origin labeling for honey. If honey originates from more than one country, the countries of origin where the honey has been harvested shall be indicated on the label in the principal field of vision, in descending order of their share in weight, together with the percentage that each of those countries of origin represents. Directive (EU) 2024/1438 also specifies that in the case of baker's honey, the words "intended for cooking only" shall appear on the label next to the product name.

12. Plant-based Meat and Dairy Alternatives
To date, there is no EU-harmonized definition of the terms "vegetarian" and "vegan" and no specific requirements for the labeling of plant-based meat and dairy alternatives.

In the EU, plant-based products cannot be labeled with dairy names such as "cheese," "butter" or "milk", according to a 2017 European Court of Justice ruling on Regulation (EU) 1308/2013. Exceptions for non-dairy products that may be labeled with reserved dairy names may be found in Commission Decision 2010/791, and for the Netherlands includes for instance the Dutch name for peanut butter ("pindakaas", which reads in translation as "peanut cheese"). For more information, please read GAIN Report E17046 European Court Prohibits Use of Dairy Names for Non-Dairy Products.

For meat-related terms, please see the GAIN EU FAIRS report and annex I (4) of the legislative proposal for the amendment of Regulation (EU) 1308/2013.

13. Other Claims
In the Netherlands, specific provisions exist for using the claim "caffeine free" (in Dutch: 'cafeïnevrij) on tea and coffee. This claim is only permitted on foodstuffs containing no more than 0.1 percent caffeine of the dry weight, as set out in Article 11a sub 2 of Warenwetbesluit Bereiding en Behandeling van Levensmiddelen (in Dutch).

Section III. Packaging and Container Regulations

B. Packaging Sustainability Measures

An overview of EU legislation applicable to packaging (waste) is available on the European Commission's website. For biobased, biodegradable, and compostable plastics, a Communication was published on an EU policy framework. It was published in 2022 and while nonbinding, it will guide future EU work.

Packaging and Packaging Waste

EU Member States are required to take measures to reduce packaging waste and must introduce systems for reuse, recovery, and recycling of packaging materials. From August 12, 2026, certain aspects of the EU Regulation on Packaging and Packaging Waste (Regulation (EU) 2025/40) will start to apply. The Regulation introduces waste reduction targets and requires that all packaging placed on the EU market is recyclable and carries recycling labeling. The Regulation also introduces new requirements for packaging minimization, minimum recycled content in plastic packaging, and re-use targets for packaging. Annex V of Regulation (EU) 2025/40 will also limit the use of certain packaging formats such as single-use plastic grouped packaging, single-use plastic packaging for unprocessed fresh fruit and vegetables, and single-use plastic packaging for condiments, preserves, sauces, coffee creamer, sugar, and seasoning in the hotel and restaurant sector. Please see for more information GAIN Report E42024-0012 European Union Finalizes New Rules for Packaging and Packaging Waste Reduction.

Currently, Council Directive 94/62/EC still governs packaging (waste). For the Netherlands, the Directive is transposed into the 2014 Dutch Packaging Management Decree (in Dutch). This Decree arranges producer responsibility, recycling targets, and prescribes packaging composition in order to reduce later harm in the waste stage. More information can be found on the website of the Dutch Government (in Dutch). The organization Verpact, which plays a central role in overseeing and managing the collection and recycling of packaging waste in the Netherlands, also provides a lot of information about the Dutch recycling and reuse results for packaging, as well as the Dutch policy on packaging and packaging waste, https://www.verpact.nl/nl/downloads-beleid (in Dutch).

Single-Use Plastics

A European Single-Use Plastics Directive ('SUP Directive') (Directive (EU) 2019/904) was created to reduce the impact of plastic products on the environment. It thereby regulates the producer's responsibility for the costs of the disposal, transportation and processing of (disposed) plastic packaging items. Moreover, the Directive introduced a ban on certain single-use plastics, such as cutlery, plates, straws, beverage stirrers, food containers made of polystyrene and products made from oxo-degradable plastic. For further information, please also see GAIN Report E42021-0054 European Union Single Use Plastics Directive Enters into Force.

For the Netherlands, the Directive is transposed into the Single-Use Plastic Products Decree (in Dutch) and underlying regulation. To provide clarity on which and how products fall within the scope of a "single-use plastic", an Assessment Framework (in Dutch) is available from the Dutch Ministry of Infrastructure and Water Management, The Dutch organization Verpact also provides more information on the Single-Use Plastics Directive on their website, https://www.verpact.nl/en/single-use-plastics-sup-directive.

Additionally, there is a mandatory labeling requirement for disposable plastic products, such as drinking cups. These products need to carry a label-informing consumers of the presence of plastic in the product and the harmful effects on the environment (Picture 3). EU-harmonized marking specifications on single-use plastic product labels are laid down in Regulation (EU) 2020/2151.

Picture 3. "Plastic in Product" marking for disposable cups

C. Material in Contact with Food Stuffs

An introduction to the European Food Contact Material (FCM) legislation can be found on the website of the European Commission.

Member States are allowed to provisionally authorize the use of certain substances not listed in one of the specific EU directives. Member States may also restrict or temporarily prohibit the use of certain materials authorized by specific directives for reasons of public health. This, however, is a practice that is rarely used.

When there is no specific EU legislation, EU Member States may establish national measures. The Netherlands has national rules on a number of materials: paper and board, rubber, metals and alloys, glass and glass ceramics, ceramics and enamels, textiles, wood and cork, coatings and varnishes, and colorants and pigments. For plastics, there is a positive list for excipients and substances that directly affect polymerization. The Dutch Warenwet covers the legislation on and requirements for food contact materials, detailed information can be found in the Warenwetbesluit verpakkingen en gebruiksartikelen (in Dutch) and Warenwetregeling verpakkingen en gebruiksartikelen (in Dutch). The competent authority in the Netherlands is the Ministry of Health, Welfare, and Sport.

Bisphenol A

On December 31, 2024, the European Union published Regulation (EU) 2024/3190 which bans the use of Bisphenol A (BPA) in food contact materials as of January 20, 2025. The Regulation includes phase-in periods which differ based on the type of packaging. For more information, please see GAIN Report E42025-0004 European Union Bans Bisphenol A in Food Contact Materials.

Section IV. Food Additive Regulations

A. Additives

For additives, there are national provisions (in Dutch) for labeling. They stipulate that the Dutch or English language is allowed (and additional languages permissible), for additives *not intended for final consumers (e.g., business users)* (falling within the scope of Article 22 of Regulation (EU) 1333/2008).

B. Flavorings

Smoke flavoring:

In January 2024, following EFSA's scientific assessments, the Commission decided not to renew the authorizations for eight smoke flavorings: SF-001, SF-002, SF-003, SF-004, SF-005, SF-006, SF-007, SF-008, SF-009 and SF-010. Commission Implementing Regulation (EU) 2024/2067 sets out different phase-out periods to give time for producers and operators to adapt to the new rules, following the deletion of eight smoke flavorings from the Union list. After a phase-out period, these flavorings will no longer be permitted for use in the EU:

- When used to replace traditional smoking (e.g. hams, fish, cheeses) the phase-out ends on July 1, 2029.
- For uses where the smoke flavoring is added for extra flavor (e.g. soups, crisps, sauces), the phase-out period ends on July 1, 2026.

C. Enzymes

Food enzymes used for a technological purpose in the manufacture, processing, preparation, treatment, packaging, transport or storage of foods (including processing aids), will undergo a safety evaluation following Regulation (EU) 1332/2008. Currently, industry applications are being evaluated by the European Food Safety Authority. Until an EU positive list of authorized enzymes is drawn up, national rules will continue to apply. Further information is available at the European Commission's website, https://ec.europa.eu/food/safety/food-improvement-agents/enzymes/eu-rules_en.

The Netherlands does not have a national positive list of enzymes. However, there are restrictions on the use of enzymes in meal and bread in the Netherlands. The competent authority in the Netherlands is the Ministry of Public Health, Welfare, and Sport.

In addition, there are national provisions (in Dutch) for enzyme labeling. They stipulate that the Dutch or English language is allowed (and additional languages permissible), for additives *not intended for final consumers (e.g., business users)* (falling within the scope of Article 11 of Regulation (EU) 1332/2008).

D. Processing Aids

EU-harmonized rules only exist for certain categories of processing aids: a list of extraction solvents allowed in the production of foodstuffs and food ingredients, along with their conditions of use has been established in Council Directive 2009/32/EC. Processing aids that are subject to Dutch legislation can be found in the Warenwetbesluit Bereiding en Behandeling van Levensmiddelen (in Dutch) and Warenwetregeling Extractiemiddelen (in Dutch). The competent authority in the Netherlands is the Ministry of Public Health, Welfare, and Sport.

Section V. Pesticides and Other Contaminants

A. Pesticides

Regulation (EU) 1107/2009 sets out rules for the authorization of plant protection products. For the authorization/withdrawal of plant protection products, the EU is divided into three zones. The Netherlands, together with Belgium, Czech Republic, Germany, Ireland, Luxembourg, Hungary, Austria, Poland, Romania, Slovenia, and Slovakia, falls under Zone B – Centre (see Annex I of regulation 1107/2009).

B. Contaminants

In addition to the EU-harmonized maximum levels for contaminants in the Annexes of Commission Regulation (EU) 2023/915, the Netherlands has set additional maximum levels for benzo(a)pyrene in food supplements in Warenwetregeling Verontreinigingen in Levensmiddelen (in Dutch).

Section VI. Other Requirements, Regulations, and Registration Measures

A. Certification and Document Requirements

Following an update of the EU's Animal Health Law, which entered into force on April 21, 2021, the EU has updated all required certificates for products of animal origin and for composite products (see below). Models of the new certificates for foods of animal origin were published by the EU and implemented by U.S. agencies. Several amendments to the new certificates have been made since their first publication. They are available from Commission Implementing Regulation (EU) No 2020/2235.

Composite Products

Regulation (EU) 2022/2292 defines composite products as foodstuffs intended for human consumption that contain processed products of animal origin and ingredients of plant origin. Composite products include a wide variety of products, including cheesecakes, high protein food supplements, pizza, and lasagnas. U.S. exports of "composite products" continue to be restricted by burdensome certification requirements.

Exporters should be aware that in parallel with the aforementioned changes to the composite product certificate, the EU also made changes to the categories of composite products that require U.S. Government-issued health certificates. The new system is no longer based on the percentage of ingredients of animal product in the final product, as was the case until April 21, 2021. The new system that went into effect on April 21, 2021, establishes three categories of composite products: (1) non-shelf-stable composite products, (2) shelf-stable composite products that contain meat products, and (3) shelf-stable composite products that do not contain meat products. All processed products of animal origin have to be sourced from EU-approved establishments. The EU continues to require composite product certificates for all non-shelf-stable products and for shelf-stable composite products with a meat ingredient. A private company attestation will be required for shelf-stable products not containing meat. This attestation is not issued by the U.S. Government but must be signed by the representative of the importing company in the EU. The EU-approved establishment production number of the processed animal product must be stated both on the composite certificate and on the private attestation. With the publication of Regulation (EU) 2023/2652, the import requirements for honey will change. As of November 29, 2024, honey entering the Netherlands must come from EU-approved establishments.

USDA's Food Safety Inspection Service (FSIS) will issue EU composite product certificates for composite products produced at FSIS-regulated facilities and bearing the USDA mark of inspection. AMS Dairy Program will issue the EU composite product certificates for composite products NOT produced in an FSIS-regulated facility and not bearing the USDA mark of inspection, regardless of whether dairy is an ingredient in the composite product. The new EU requirements for composite products will impact stakeholders who have not been required to obtain an export certificate from AMS Dairy Program in the past. Prior to requesting a certificate from AMS Dairy Program, a new customer will need to establish a USDA level 2 e-authentication account. Go to How to Apply for an AMS Dairy or Composite Product Export Certificate for more information.
More information on the import conditions for composite products is available on the European Commission's website. This website also includes a compilation of Questions & Answers intended to clarify a multitude of practical questions that have been raised on the new rules.

C. Inspections
The list of animal origin products subject to official controls at border posts was updated in Commission Implementing Regulation (EU) 2021/632.

Composite products listed in Commission Delegated Regulation 2021/630 are exempted from checks at the border because of the low risk they present. The list includes products such as biscuits, confectionary and food supplements. All consignments to be presented at the border control posts have to undergo documentary checks. Identity and physical checks are carried out at a frequency depending on the risk linked to the specific animals or goods. The criteria to determine and modify the frequency of rates are established by the Commission.

The EU also maintains a list of food and feed of non-animal origin from certain third countries subject to a specified level of physical controls for certain contaminants. This list is published in Commission Implementing Regulation (EU) 2019/1793 and is regularly reviewed to account for the latest noncompliance information.

In the Netherlands, the NVWA is responsible for inspections. Criteria for laboratories conducting food controls have been EU-harmonized, but it is the Member States' responsibility to designate laboratories that are allowed to perform analyses. A list of laboratories designated by the Netherlands to perform analysis can be found at the website of the Dutch Accreditation Council at: https://www.rva.nl/en/alle-geaccrediteerden/. Different laboratories are accredited for different types of controls.

For compliance in relation to inspections, importance should also be given to food safety standards as elaborated upon in the Warenwetbesluit Bereiding en Behandeling van Levensmiddelen (in Dutch).

Dutch Accreditation Council (RVA)
P.O. Box 2768, 3500 GT Utrecht, the Netherlands
Phone: +31 302 394 500
Email: cfa(at)rva.nl
Website: https://www.rva.nl/en

D. Product Registration
Infant formula, follow-on formula, food for special medical purposes and total diet replacement for weight control are special use foods that require a notification to the competent authority, per Regulation (EU) 609/2013. In the Netherlands, the competent authority is the NVWA and the notification must be done via the Registration Form Nutrition which is available on the NVWA website. The form will require, among others, sending a copy of the product label.
More information can be found here, https://www.nvwa.nl/onderwerpen/babyvoeding-en-andere-speciale-voeding/aanmelden-voeding-voor-specifieke-groepen (in Dutch).

Section VII. Other Specific Standards

A. Novel Foods
The EU uses a Regulation (EU) 2015/2283 on Novel Food, along with a Union list of novel foods (Commission Implementing Regulation (EU) 2017/2470). Food business operators are responsible for verifying whether the food or ingredient they intend to market in the EU is novel or not. A first step to find the status is to look at the EU's Novel Food Status Catalogue, although this is not legally binding. Legislation should be consulted to confirm the status. When still unsure about the status, another way forward is the consultation procedure. The procedural steps for this consultation procedure may be found in Commission Implementing Regulation 2018/456. Should a company wish to use this procedure, they should consult the competent authority of the EU Member State where they first intend to market their product. In the Netherlands this is the Novel Foods Unit of the Medicines Evaluation Board (CGB-MEB), which advises the Ministry of Health, Welfare and Sport (VWS) on novel foods. According to the Dutch Warenwetregeling Raadplegingsprocedure Nieuwe Voedingsmiddelen, the consultation procedure can take up to 4 months. For more information, see https://english.cbg-meb.nl/topics/novel-foods/nv-determination-of-novel-food-status.

Consultation requests should be sent electronically to the novel food assessment body:
Medicines Evaluation Board (CBG-MEB), Novel Food Unit
P.O. Box 8275
3503 RG Utrecht, the Netherlands
Tel: +31 (0)88 224 8000
Email: novelfoods(at)cbg-meb.nl
Website: https://english.cbg-meb.nl/

D. Fortified Foods
Regulation (EC) No 1925/2006 sets an EU-wide regulatory framework for the addition of vitamins, minerals, and certain other substances (such as herbal extracts) to foods. The Annexes provide a positive list, indicating which compounds may be added to foods. Please refer to the GAIN EU FAIRS report.

The Netherlands has additional national regulation for fortified foods. In terms of quantities, the vitamins and minerals added to fortified food, may only account for 15 to 100 percent of the "daily reference intake", per estimated daily consumption. The applicable daily reference intakes can be found in annex 2 and annex 3 of the Dutch Warenwetbesluit Toevoeging Micro-Voedingsstoffen aan Levensmiddelen (in Dutch), and are the same as the EU daily reference intakes found in Annex XIII, Regulation (EU) 1169/2011.

Lastly, the addition of vitamin A, vitamin D, folic acid, selenium, copper, zinc, and iodine to foods is highly restricted in the Netherlands. They can only be added at certain levels, and sometimes only to certain foods (for instance, margarine). These rules are laid out in the Warenwetbesluit Toevoeging Micro-Voedingsstoffen aan Levensmiddelen, Warenwetregeling Vrijstelling Toevoeging Foliumzuur en Vitamine D, and Warenwetregeling Vrijstelling Vitamine D (all in Dutch).

F. Food Supplements

For an introduction to marketing food supplements in the EU, please consult GAIN report E17004 Exporting Food Supplements to the European Union. In the EU overall, food supplements have been regulated by Directive 2002/46/EC. This directive is transposed into and supplemented by several Dutch decrees and acts, being Warenwetbesluit voedingssupplementen, Warenwetregeling voedingssupplementen, Warenwetregeling vrijstelling voedingssupplementen, and Warenwetbesluit Kruidenpreparaten (all in Dutch).

Directive 2002/46/EC sets out specific requirements for food supplement labeling. A nutrition declaration is not necessary, and nutrition declaration rules of EU Regulation 1169/2011 do not apply to food supplements. In short, a food supplement label to contain:

- the compounds in the food supplement, along with their quantities and daily reference intake (in Dutch: "referentie-inname (RI)").
- the recommended daily portion of the product
- a warning related to exceeding the recommended daily portion
- a statement that food supplements are not to be used as a substitute for a varied diet
- a warning that food supplements should be kept out of reach of young children

This must be read in conjunction with the additional rules found in Article 6 and 7 of Warenwetbesluit voedingssupplementen (in Dutch), for instance in relation to the "daily reference intake."

There are no EU-harmonized rules on minimum and maximum levels of compounds in food supplements, although the general rule is that the quantities used should be safe (in line with Regulation (EC) No 178/2002). However, Dutch regulation does restrict the levels of Vitamin A, vitamin D, and Vitamin B6, and introduces a mandatory age-related warning that should be printed on the label, see Warenwetregeling Vrijstelling Voedingssupplementen (in Dutch).

Limitations also exist for food supplements containing herbal extracts, see Warenwetbesluit Kruidenpreparaten (in Dutch). In addition, the Dutch Food Supplements Industry Organization maintains a comprehensive list with voluntary, advisable, and mandatory warnings for food supplements. The most recent version may be accessed through https://www.npninfo.nl/wp-content/uploads/2025/10/NPN_waarschuwingsteksten_juni2025.pdf (in Dutch).

To address several additional safety concerns that have emerged over the years, the Ministry of Public Health, Welfare, and Sport suggested an amendment of the Warenwetbesluit Kruidenpreparaten. The amendment would ban or restrict the use of certain herbal extracts and requires a mandatory warning for others. In 2025, an internet consultation (in Dutch) was opened to receive input on the proposal, which now is under review.

Medical claims should not be used on food supplements. Exporters should take diligent care in assessing the claims on their product packaging, and ascertain themselves that claims comply with the EU

Nutrition and Health Claims Regulation 1924/2006. Please also refer to the GAIN EU FAIRS report, section II, subsection B under 2. For more information on how the Dutch authorities assess and distinguish between claims in the Netherlands, see https://www.nvwa.nl/onderwerpen/voedingsclaims-en-gezondheidsclaims/verbod-op-medische-claims. In addition to the NVWA, another resource is https://keuringsraad.nl/regels-wetgeving/overzicht/.

Additional import requirements apply for some food supplements. Gelatin capsules containing fish oil require a TSE attestation per Annex V to Regulation (EC) No 999/2001, in addition to a fishery certificate issued by U.S. Department of Commerce's National Oceanic and Atmospheric Administration (NOAA). Whey protein supplements might need a certificate for processed dairy products or composite products – exporters should work with their importers to make the right determination. For more information see GAIN report "Certification and Labeling of EU Whey Protein Supplements."

Although some EU Member States require notification of food supplements, this is not the case in the Netherlands.

G. Irradiated Foodstuffs

EU harmonization of food irradiation rules has been slow and only a few products have so far received EU-wide approval. Until the EU positive list is expanded, national authorizations continue to apply. When the requirements in the Dutch Warenwetbesluit Doorstraalde Waren (in Dutch) are met, it is possible to import irradiated food products from the United States into the Netherlands. The main requirements are that the treatment must have taken place at an EU-approved facility and that each shipment must include the name and address of this approved facility. The competent authority in the Netherlands is the Ministry of Public Health, Welfare, and Sport.

In English:	**In Dutch:**
If products treated with ionizing radiation are sold, the words 'irradiated' or 'treated with ionizing radiation' shall appear on the label.	In the Netherlands the label should mention 'doorstraald,' 'door straling behandeld,' or 'met ioniserende straling behandeld.'

I. Pet Food

In October 2023, the European Union adopted Regulation (EU) 2023/2419 on the labeling of organic pet food. Pet food can now be labeled with the EU organic production logo if 95 per cent of its agricultural ingredients are organic. Prepacked organic food shall use the organic logo of the European Union on the packaging if at least 95 percent of the agricultural ingredients are organic. This requirement entered into force on May 1, 2024. Organic pet food labeled in accordance with national rules or private standards accepted by the Member States between January 1, 2022, and October 30, 2023, may be placed on the market until stocks are exhausted. For more information, please see GAIN report E42023-0049 EU Adopts New Rules for Organic Pet Food.

J. Vegetarian and Vegan Foods, and Plant-Based Meat and/or Dairy Alternatives

In the Netherlands, the V-label may be acquired, a label widely used in Europe. Eligible *vegetarian* products can carry the green vegetarian V-label logo and *vegan* products can carry the yellow vegan V-label logo (Picture 4). Additional information can be found at, https://www.v-label.com/nl/ (in Dutch).

Picture 4. The V-label Vegetarian and Vegan Quality Mark

Source: https://www.v-label.com/press-materials/

Section VIII. Trademarks, Brand Names, and Intellectual Property Rights

A. Trademarks

The Netherlands' Office for Intellectual Property is the official government body responsible for granting patents, designs, trademarks, and copyright. Exporters wanting to register trademarks/brand names are advised to contact:

The Office for Intellectual Property
P.O. Box 90404, 2509 LK The Hague, the Netherlands
Phone: +31-70-349-1111
Email: info(at)boip.int
Website: https://www.boip.int/en

More detailed information on trademarks can be found here.

Section IX. Import Procedures

C. Import Duties

The EU uses the Combined Nomenclature (CN) for the customs classification of goods. The CN eight-digit code numbers are based on the Harmonized System (HS) nomenclature: the first six digits refer to the HS headings; the two following digits represent the CN subheadings. The EU's on-line "TARIC" customs database can be consulted to look up commodity codes and relevant import duties. TARIC is a multilingual database covering all measures relating to tariff and trade legislation. The EU's revised 2025 Tariff Schedule was published on January 1, 2025 in the Official Journal. The Dutch customs authority is called "douane" and more information can be found at https://www.belastingdienst.nl/wps/wcm/connect/en/business/business.

In the Netherlands, it is possible to obtain Binding Tariff Information (BTI) by contacting the Tax Office and completing the application form (in Dutch). This service is especially advisable in order to get the proper product classification and relevant import duty, as well as for more complex food products, as it involves closer consideration of the product's composite ingredients and is legally binding. The BTI is valid for three years. With a BTI, both the U.S. exporter and the Dutch importer know how the goods are classified and what documentation is required.

All BTI decisions issued by the Member States' customs authorities are entered into an EBTI-database. All business operators must submit all new applications electronically. More information is available on the EC's website.

The customs value of a good is the CIF price at the European border derived from the product price found on the invoice and the transportation costs reflected in the airway bill or the bill of lading. More information can be found at the website of the Dutch Tax Officehttps://www.belastingdienst.nl/wps/wcm/connect/bldcontenten/belastingdienst/customs/authorisations/customs-authorisations/applying-for-an-authorisation/applying-for-customs-authorisation.

Tax Office in the Netherlands
Belastingdienst Douane Breda
Landelijk Tariefinlichting Team
PO Box 3070, 6401 DN, Heerlen, the Netherlands

Goods are only released after payment of the import duty and other taxes that may be due. Duties payable on goods imported into the EU may include:

- Import duty (expressed as ad valorem tariffs or specific tariffs per unit weight/volume/number of pieces) – EU-harmonized
- Additional duties on flour and sugar (processed products) – EU-harmonized
- Entry price (fruit and vegetables) – EU-harmonized
- Environmental taxes - not harmonized
- Inspection fees - not harmonized
- Value Added Tax (VAT) - not harmonized
- Excise duties (alcohol and tobacco) - not harmonized

A list of VAT rates applicable in the different Member States can be found at: https://europa.eu/youreurope/business/taxation/vat/vat-rules-rates/index_en.htm.

D. Excise Duty for Alcoholic Products

Since February 13, 2023, Directive (EU) 2020/262 is in force. The text sets out common definitions of alcoholic products that are subject to excise duty and ensures that all Member States treat the same products in the same way. It outlines general arrangements for goods subject to excise duty, including those around production, storage, and movement of excise goods across EU territory. The excise legislation also establishes the minimum rates of tax that must be applied for each category, but Member States can decide to set rates at a higher level. As of February 13, 2023, all excise duty transactions in the EU also became fully electronic. The new Directive increases the threshold for lower strength beer that can benefit from reduced excise duty rates. It extends the special regime of reduced excise duty rates for small beer and ethyl alcohol producers to producers of other fermented beverages, such as

cider. Directive (EU) 2020/1151 also sets out the conditions for application of the exemption from excise duty rules for denatured alcohol, used for example in cleaning products. More information on excise duties for alcohol can be found on the Commission's website, https://taxation-customs.ec.europa.eu/taxation/excise-duties/excise-duties-alcohol_en.
The Netherlands increased, as of January 1st, 2024, its excise duty on distilled spirits to €1,827 per hectoliter of pure alcohol. Given the differences in excise duty between member states, it is advisable for U.S. exporters to only custom clear alcoholic beverages upon arrival and keep them in a bonded warehouse. It is also advisable to pay the excise duty when the final destination of the product is known since the destination will determine how much excise duty needs to be paid.

Animal and plant products are brought in from countries all over the world into the EU. To prevent the introduction of animal diseases and pests, and to protect the market from public health risks, the European Commission set out detailed regulations.

On this basis, the Dutch NVWA performs checks on:
Live Animals (such as horses, chickens, and ornamental fish) and products of animal origin (such as meat, fish, wildlife, and animal feed): More detailed information on the import procedures for animals and products of animal origin can be found on https://english.nvwa.nl/topics/import-of-animals-and-animal-products.

Foodstuffs (such as vegetables, dried fruits, spices, nuts, and seeds): More detailed information on the import procedures for foodstuffs can be found on the following websites: https://english.nvwa.nl/topics/themes/food-safety and https://www.nvwa.nl/onderwerpen/import-van-levensmiddelen-en-consumentenproducten.

Plant Products: Veterinary checks are applicable to some plant products, especially hay and straw. These products may only be imported from certain countries. More detailed information on the import procedures for plant products can be found on https://english.nvwa.nl/topics/import-regulations-of-the-netherlands-on-plant-health.

The CITES regulations (in Dutch) (CITES: Convention on International Trade in Endangered Species of wild flora and fauna) are, in addition to the national and EU legislation, applicable on the import of live animals, animal products, food, and plant products into the Netherlands.

Section X. Trade Facilitation

A. Advance Rulings

Please see for more information the GAIN EU FAIRS report. Besides through the EU Customs Trade Portal, companies headquartered outside of the EU customs territory can make a request for Binding Tariff Information (BTI) with the Dutch Customs Administration through the following paper form, https://www.douane.nl/kennisbank/documenten/aanvraagformulier-bindende-tariefinlichting/ (in Dutch). See for more information the above Section IX, subsection C.

C. Electronic Certificates

The Official Controls Regulation (OCR - Regulation (EU) 2017/625) provides the legal basis for the general EU acceptance of electronic certificates using the EU's Integrated Management System for Official Controls (IMSOC). The United States issues electronic certificates for some product groups, e.g., almonds and organic products.

E. Average Release Time for Products - Common Delays

An overview of checks that can be performed at the Border Control Posts (BCPs) in the Netherlands can be found online at: https://www.nvwa.nl/onderwerpen/import-levensmiddelen-en-diervoeder-van-niet-dierlijke-oorsprong/controles (in Dutch).

Documentary Check: This is an examination of the original required documents that accompany the consignment based on model certificates according to EU legislation. The documentary check is carried out by Customs, based on an agreement between the Ministry of Agriculture, Fisheries, Food Security, and Nature and the Ministry of Finance.

Identity Check: This is to ascertain that the products correspond to the information given in the accompanying certificates or documents. All veterinary goods undergo an identity check, and this check is conducted by comparing the seal number of the container with the seal number mentioned on the Health Certificate. If no seal number is mentioned on the Health Certificate, the veterinary authorities will need to open the shipment to conduct the identity check.

Physical Check: This is a check on the product itself, to verify compliance with the food or feed law, and will involve sampling of the product. The NVWA has published the lead times for these laboratory tests on its website: https://www.nvwa.nl/onderwerpen/import-dieren-en-dierlijke-producten/controles-in-een-grenscontrolepost/doorlooptijden-laboratoriumonderzoek (in Dutch).

If the NVWA **decides to detain** a shipment, it will produce an official notification which will be sent to the freight forwarder. This notification will mention the reason why this shipment was detained and what needs to be done in order to release it. If the NVWA **plans to reject** a shipment, it will draw up this notification; if the NVWA **has decided to reject** a shipment it will draw up this notification. The NVWA website offers an overview of the BCP procedure for animals and animal (by) products and for foodstuffs and feed of non-animal origin.

Appendix I. Government Regulatory Key Agency Contacts

Ministry of Agriculture, Fisheries, Food Security, and Nature
P.O. Box 20401, 2500 EK The Hague, the Netherlands
Website: https://www.government.nl/ministries/ministry-of-agriculture-fisheries-food-security-and-nature

Ministry of Finance
P.O. Box 20201, 2500 EE The Hague, the Netherlands
Website: https://www.government.nl/ministries/ministry-of-finance

Ministry of Health, Welfare, and Sport
Department for Nutrition, Health Protection and Prevention
Team Food Safety
P.O. Box 20350, 2500 EJ The Hague, the Netherlands
E-mail: dienstpostbusVGP-secretariaat(at)minvws.nl
Website: https://www.government.nl/ministries/ministry-of-health-welfare-and-sport

The Netherlands Food and Consumer Product Safety Authority (NVWA)
PO Box 43006, 3540 AA Utrecht, the Netherlands
Email: info(at)nvwa.nl
Website: https://english.nvwa.nl/

Customs Administration of the Netherlands
https://www.douane.nl/en/contact/offices/
Email: douane.dcc.dbr(at)douane.nl (businesses only)
Website: https://www.douane.nl/en/

Appendix II. Other Import Specialist Contacts

There are no other import specialist contacts.

For more information, please contact:
USDA's Foreign Agricultural Service (FAS) The Hague
John Adams Park 1, 2244 BZ Wassenaar, the Netherlands
+31 70 3102 299
agthehague@usda.gov

Attachments:

No Attachments