



Partnerships for
Forests

**Registering
biodiversity
products
to access new
international
markets**

The case of Baru nut
registry in the UK and EU

March 2024

Introduction

Partnerships for Forests (P4F) stands as an innovative initiative, funded by the UK Government, that dedicated to catalysing investments into forests that foster shared value among the private sector, public sector, and local communities. The programme operates across diverse regions, including Latin America, Africa, and Southeast Asia. P4F has mobilised more than £1.2 billion in private capital worldwide, while facilitating the sustainable stewardship of approximately 8.6 million hectares of land, and positively impacting the lives of more than 300,000 individuals.

The programme is concentrated on three pillars: forest partnerships, enabling conditions and demand-side measures. Forest partnerships use grants and technical assistance to support businesses that prioritise both social and environmentally sustainable uses of land. Enabling conditions tackle critical barriers that hinder sustainable investments, with a special focus on those affecting forest partnerships within P4F's portfolio. Finally, demand-side measures are dedicated to increasing the demand of sustainable forestry products, supporting the execution of existing corporate supply chain commitments, public procurement policies, and the formulation of new responsible sourcing guidelines and tools.

Within this framework, the Baru nut registration project represents a significant demand-side measure. The project focused on registering the Baru nut in the UK and EU, while disseminating knowledge to a broader ecosystem of non-timber forest product (NTFP) initiatives. To achieve this, P4F engaged legal, markets and equity consultants Hogan Lovells and Exponent, with two groups preparing a dossier sent to food safety agencies, helping to advance responsible forest management and sustainable land use on an international scale.

About the project

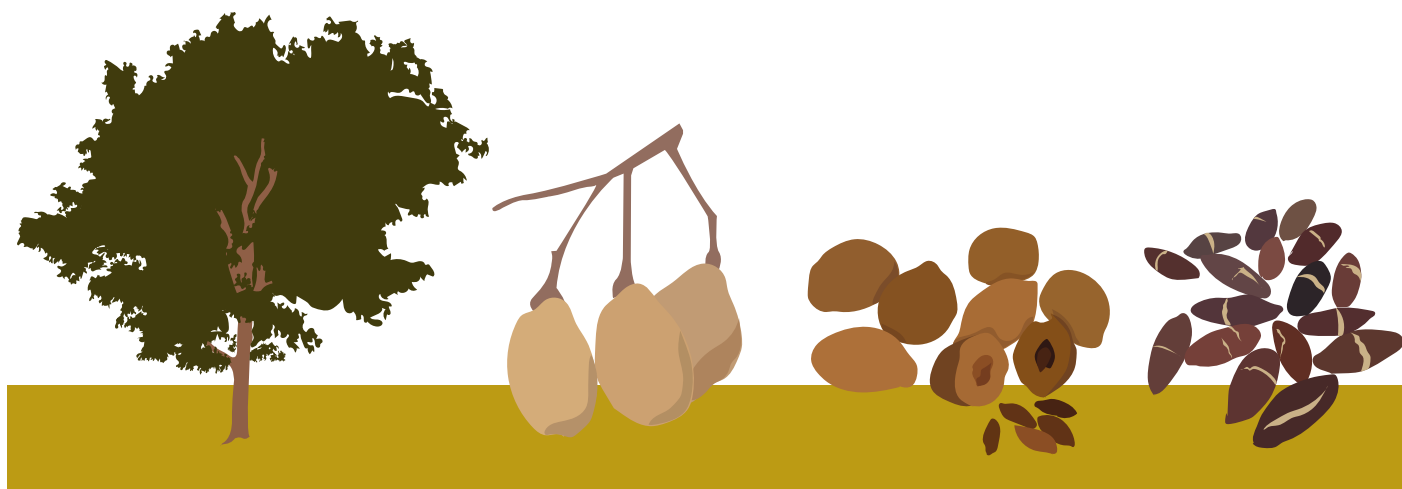
The Baru project aimed to bolster the protection of the Cerrado biome, also known as the Brazilian Savanna. Cerrado plays a crucial role in climate regulation, serving as a significant carbon sink and helping to maintain the ecological balance of the region. Covering approximately 25% of Brazil's territory, the Cerrado biome is considered one of the world's biodiversity hotspots, meaning that it is characterised by exceptionally high levels of species richness and endemism. However, the region also faces significant threats to its ecosystems and biodiversity.

Cerrado is under severe threat from agricultural expansion, mainly from cattle and soya producers. Already, it has lost a staggering 45% of its original vegetation. This rapid deforestation poses a significant risk not only to the

biodiversity of the region, but also to the livelihoods of various traditional and local communities that depend on its natural resources for subsistence.

Moreover, the Cerrado biome provides many NTFPs that are utilized by a diverse range of industries and markets. From agricultural products to medicinal plants, the Cerrado biome offers valuable resources that support economic activities and contribute to the well-being of both local communities and the broader society. One of those NTFPs is the Baru nut, which is collected from the remaining Cerrado areas by local communities. This practice serves as a source of income for these communities, as well as contributing to the conservation of the Cerrado biome by providing economic incentives for its preservation.

Infographic 1: Baru tree, fruits and nuts



The Baru, scientifically known as *Dipteryx alata*, is a fruit species indigenous to the Cerrado biome of Brazil. Renowned for its exceptional nutritional value, the nut serves as a versatile ingredient with various culinary applications. It can be consumed raw, providing a crunchy texture and a rich, nutty flavour, or roasted, to enhance its aroma and flavour profile. Additionally, the Baru nut can be processed into a wide range of products, including flour, cookies, hummus, oil, or protein bars. This versatility makes it a popular ingredient in both traditional and modern cuisine.

The Baru nut value chain holds significant importance within the Brazilian sociobioeconomy, contributing to the local economy and serving as a vital component of regional trade and commerce. Its unique origin from the Cerrado biome. This exclusivity adds to its value and reinforces its significance as a key bioeconomy product within the Brazilian context.

The Baru nut is known by various names across Brazil, reflecting its cultural diversity and regional variations. Common alternative names for the Baru nut include bajuró, cumaru, cumarurana, and feijão-coco, among others.

¹ ICMBio www.icmbio.gov.br

² Brazilian Ministry of the Environment. Source: <https://www.gov.br/mma/pt-br>

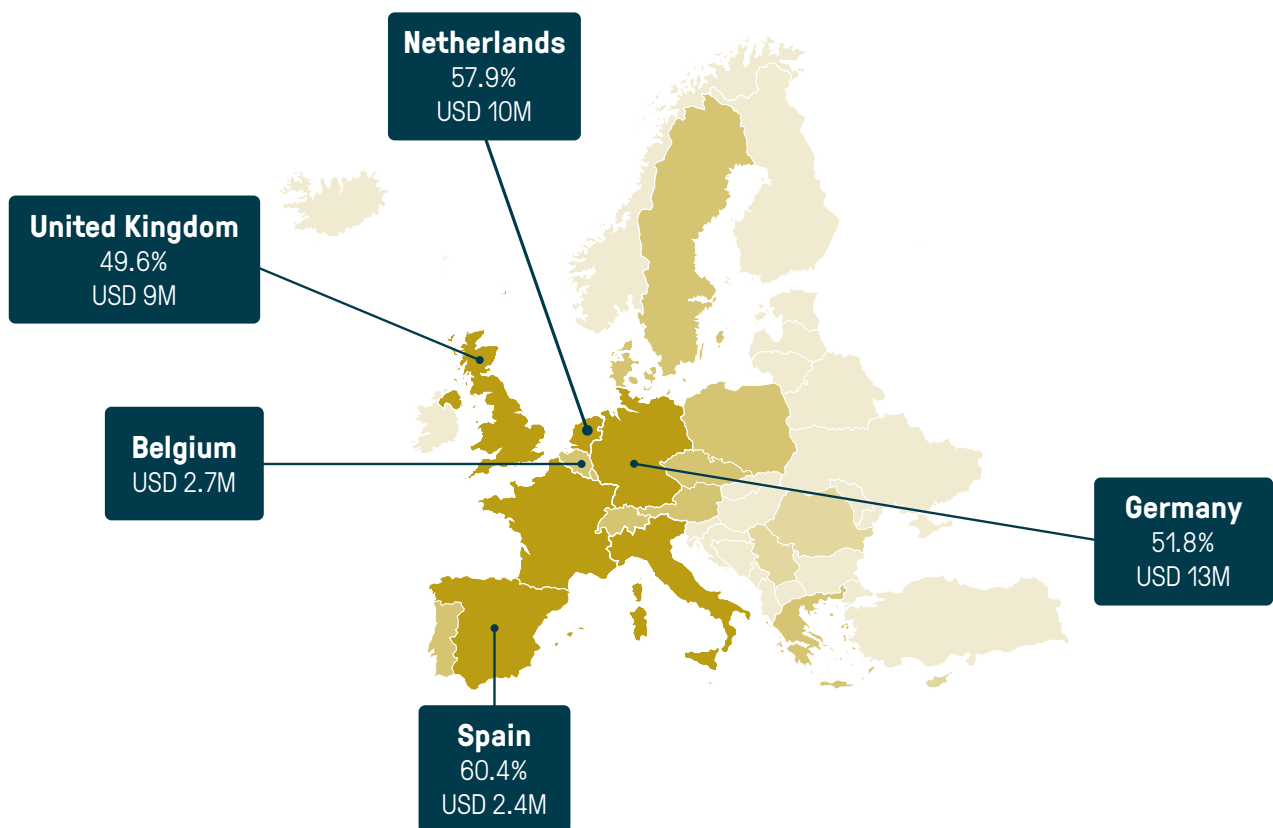
Unlocking international markets for Non-Timber Forest Products

Many NTFPs are not yet registered in international markets such as the UK or EU, where they are classed as 'novel foods'. However, those markets are experiencing a growing demand for sustainable products, and so can be strategic potential markets for bioeconomy products that value the standing forest while creating social benefits for the local communities.

The infographic below looks at the potential of nut exports from Brazil, and demonstrates the relevance of individual markets within Europe. Germany stands out among these, displaying the largest absolute difference between potential and actual exports in value terms. This suggests untapped opportunities for Brazil to increase its nut exports to Germany, with the potential to realize additional exports worth USD 13 million (£11.1 million).

Infographic 2

5 biggest untapped potential markets for nuts from Brazil in the EU and UK (August 2023)



To capitalise on these opportunities, Brazil must strategically position the NTFPs in international markets, emphasising their nutritional benefits, culinary versatility, and sustainable production practices. Additionally, efforts to establish partnerships with distributors, promote product awareness, and meet quality and safety standards are crucial for successfully penetrating and expanding in these lucrative markets.



How can small businesses afford to register NTFPs?

Several avenues exist for small forestry businesses to access financial support to register novel foods in international markets. Government agencies or non-profit organisations that support agricultural or forestry initiatives may offer grants or subsidies to often assist with regulatory compliance costs, including registration fees and laboratory testing expenses. Another option may be to partner with research institutions or universities offering funding for research and development projects related to novel food registration. Crowdfunding platforms and venture capital firms focused on sustainable agriculture and food innovation also offer potential

funding opportunities for small forestry businesses entering international markets with novel food products.

To access those types of fundings, the storytelling presented to those agencies is key. When the proposal for funding shows a concrete rationale that it can unlock investments to sustainable value chains it becomes appealing due to the potential social and environmental positive impacts. On the infographic below it is possible to see the strategy behind the Baru project, that was presented to an internal committee and selected to receive funds from P4F.

Infographic 3: Project strategy



A large portion of non-timber forest products are still not registered in international markets

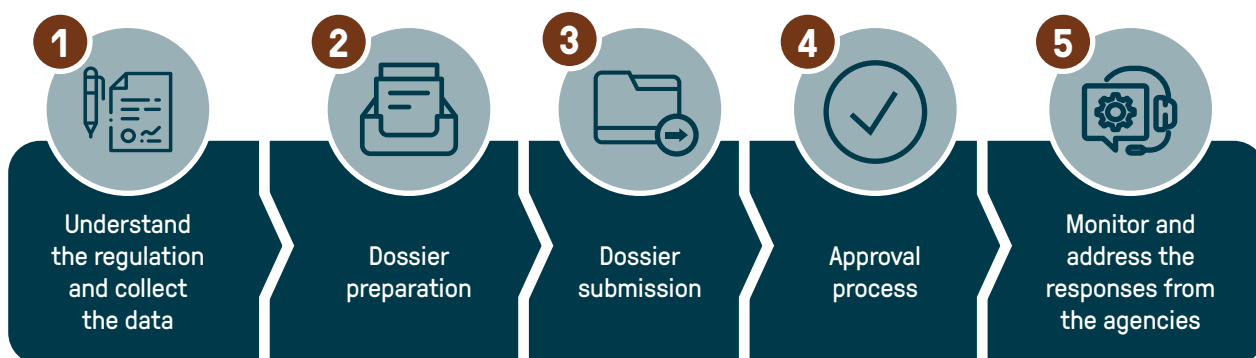


The registration process

This is a step-by-step guide of the registration process of novel foods in the UK and EU based on the Baru registration experience. Each step is shown in the infographic below and will be described in the following chapters of this material. The

specific details of the EU registration process will be used as the primary example, but the UK's registration process operates in a comparable manner, with similar requirements and timeframes.

Infographic 4: Registration process of novel foods



The registration of a novel food has some specific elements that must be understood before starting the process. It is essential to note that the registration is specific to each state of the product being submitted. For instance, if we consider the registration of Baru nuts as an example, only the roasted Baru nut will be registered. This means that other forms of the nut, such as the raw nut, oil derived from it, or products made with Baru nuts, will not be authorised until a separate registration process is completed.

Additionally, once the registration is approved, any producer who adheres to the exportation guidelines can export the product. This means that the authorisation is not exclusive to the original applicant of the registration.





The steps to completing the registration process are as follows:

1 Understand the regulation and collect the data

The first step is to allocate team time or bring the right expertise on board. In our experience with the Baru nut project, we decided to partner with consultants Hogan Lovells and Exponent to complement P4F's skills with strong legislation knowledge and scientific backgrounds respectively.

Novel foods in the EU and the UK refer to foods that originate from various sources such as plants, animals, microorganisms, cell cultures, minerals, and specific categories like insects, vitamins, minerals, and food supplements. These foods may also result from production processes and state-of-the-art technologies, including intentionally modified or newly structured molecules and nanomaterials. However, novel foods do not include items such as enzymes, additives, flavorings, extraction solvents, or genetically modified organisms (GMOs).

Under the novel foods regulation in the EU and the UK, traditional foods from third countries undergo a simplified approval process for foods with a history of safe consumption in their country of origin. For traditional foods from third countries to be approved, they must have been consumed for at least 25 years as part of the customary diet of a significant number of people. The approval process involves submitting a dossier of information supporting the notification, including evidence of consumption history and other relevant data. As such, the starting data research should focus on proving the historical consumption of the NTFP. Scientific papers, books, and supply information from companies are good sources of evidence.

The regulation of novel foods outlines procedures for determining the novel food status of a product when it is not clear, including requesting formal opinions from competent authorities and consulting with EU countries where the food is intended to be marketed.

The Novel Food Catalogue is a historical record of discussions and reviews related to novel foods. It provides information on whether a food has a history of consumption, whether it was previously only used in food supplements, or if there is no consumption history, indicating that it is considered novel. This catalogue should be consulted to better understand the status of the food before starting the registration.

2 Dossier preparation and submission

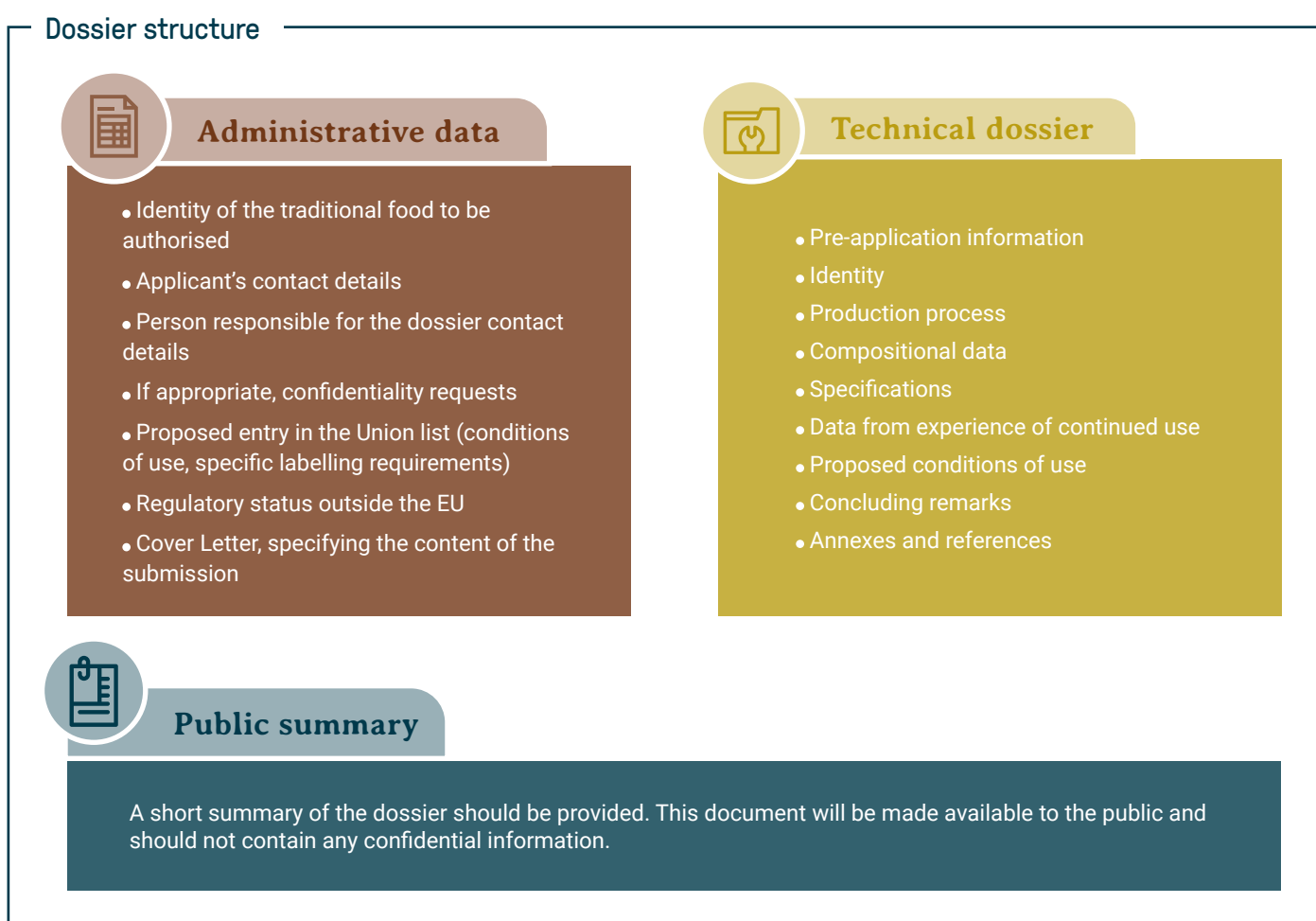
This phase involves compiling a comprehensive dossier that satisfies regulatory requirements to pave the path for market approval. That often is the most demanding part of the process. Challenges faced in this stage during the Baru registration process included:

• **Providing evidence of Baru nuts' traditional use:** Regulatory stipulations demanded proof of consumption dating back 25 years, necessitating extensive research efforts. This phase took longer than first anticipated. While some NTFPs like Baru may have been consumed for many years, there is not always accessible evidence of this consumption, which can complicate the process.

• **Engaging with specialised laboratories:** It is important to find a laboratory that can conduct thorough analyses using validated methods. Search for entities with comprehensive testing protocols.

• **The duration of stability testing:** This test is essential for assessing the shelf-life and quality of the product. It typically takes around a year to be complete. Starting the stability tests at the beginning of the workplan can reduce overall timelines of the process.

Infographic 5: Dossier structure



In submitting a notification for a traditional food, the applicant must compile essential information, including their name and address, a detailed description of the traditional food, its composition, and the country or countries of origin. Crucially, documented data demonstrating the history of safe food use in a third country must be gathered and presented. Additionally,

a proposal outlining the intended conditions of use and specific labelling requirements, ensuring they do not mislead consumers, is required. Once the notification package is prepared, it is submitted to the relevant regulatory authority in the UK and the EU electronically.

3 Approval process

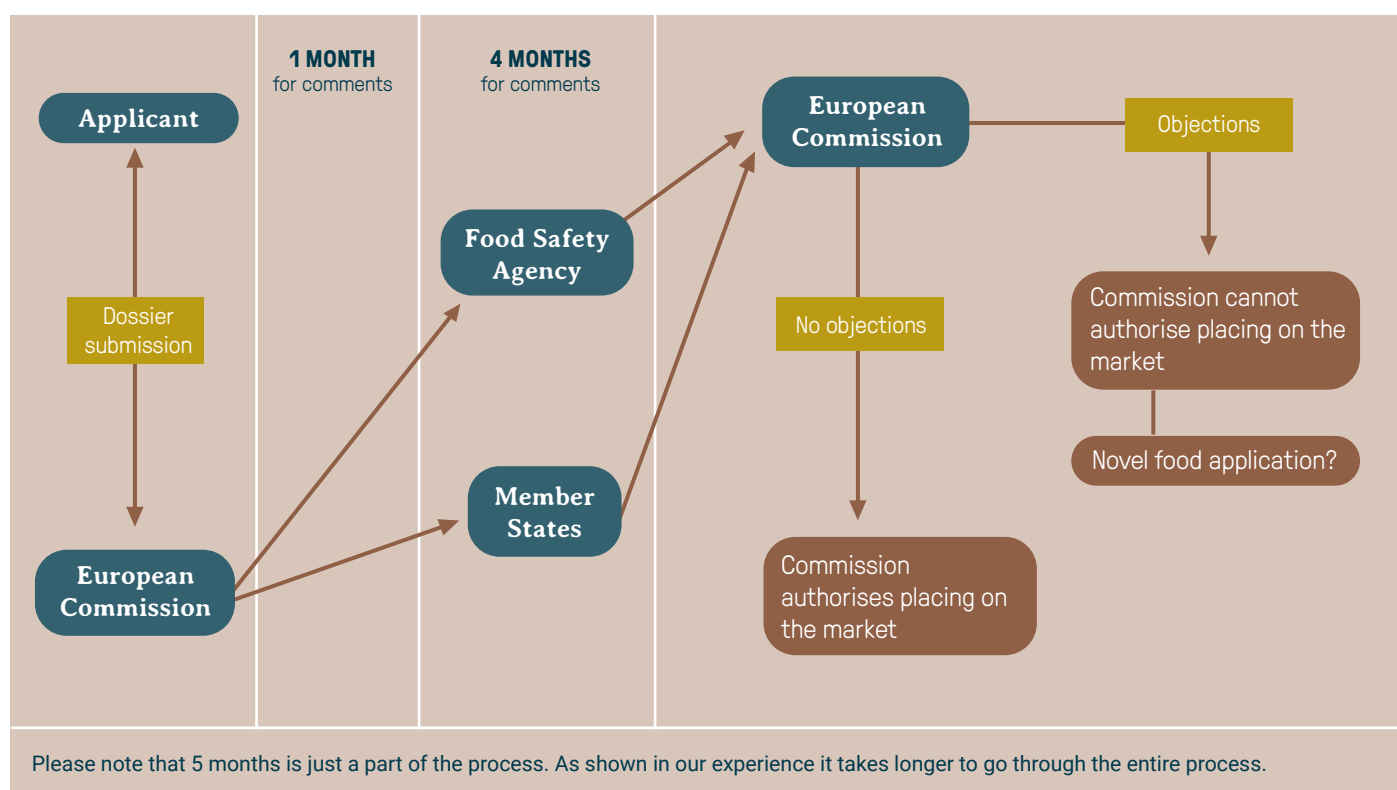
The authority then reviews the notification, assessing compliance with regulatory standards before issuing approval for market entry. Throughout the process, prompt responses to any feedback or requests for additional information are essential to facilitate a smooth review process and eventual authorization for commercialisation.

Once the applicant submits the dossier, it goes through a suitability or validity check (to ensure all the required

documents are submitted) and following that it goes through the risk assessment process. On the infographic 5 you can see the process of traditional novel food approval in the EU. The process is similar for the UK, with similar timeframes. Once the dossier is submitted, it usually takes at least five months for the assessment to be completed. If the regulatory authority provides the applicant with a request for information during their review, then this timeframe is paused, and the applicant needs to address the requests before the process is continued.

Infographic 6: Approval process of traditional novel foods

Process for traditional food approval in the EU



4 Monitor and address the responses from the agencies

Monitoring and addressing responses from regulatory agencies are crucial. Upon submission of a notification, it is essential to remain attentive to any feedback or requests for additional information from the regulatory authorities. Timely and thorough responses to these inquiries are paramount to ensure a smooth review process and eventual authorization for market entry.

Once authorisation is granted, and it is published in the Official Journal, the novel food can be placed on the market. The European Union list of approved novel foods is established

through Commission Implementing Regulation, which includes detailed information on authorized novel foods, such as specific food categories, maximum levels of use, additional labelling requirements, and any other particular requirements. Each time a new novel food is authorized, a new Implementing Regulation is adopted to amend Regulation 2017/2470, reflecting the dynamic nature of novel food approvals and regulatory updates. Authorisations are typically generic, unless the applicant has been granted exclusivity based on proprietary data. In such cases, the applicant may market the novel food exclusively for a period of five years following authorisation.

Project's timeline

The timeline of the Baru registration project is described below. Please note that the project activities of the first phase of P4F ended in February 2024. The applicant is currently tracking the responses of the food safety agencies from the UK and the EU. Based on current timeframes, we expect to have a decision on the authorisation of the Baru nut by September 2024.

Infographic 7: Project experience






Conclusion

This material serves as an example of how to navigate the traditional foods registration process showcasing the experience of the Baru nut notification in the UK and EU. The Baru nut registration project exemplifies the intersection of environmental conservation, economic development, and international trade, showcasing the potential of novel foods to drive socio-economic growth while preserving biodiversity.

The project underscores the importance of strategic partnerships, meticulous planning, and regulatory compliance in unlocking market access for biodiversity products. It shows that is possible for small forestry businesses to overcome barriers to entry to global markets and position themselves for success in exporting NTFPs.



This case study was developed by Partnerships for Forests in Latin America, in collaboration with the External Relations and Knowledge global team

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