



Guidance on the Authenticity of Herbs & Spices

Industry best practice on assessing and protecting culinary dried herbs & spices



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Foreword

It has been ten years since the first publication of this guidance and, since that time, we are pleased that our joint industry working group has continued to strengthen resilience and collaboration within the herbs and spices sector. Regulators and industry have a shared interest in reducing the risks to public health and maintaining consumer confidence. Given the size of the herbs and spices market, it features regularly in sampling programmes across industry and regulatory bodies. Work has also continued to support businesses in reducing their vulnerabilities.

Despite this progress, we need to remain vigilant. Herbs and spices continue to be potential targets for a broad range of economically motivated adulteration. Geopolitical events, economic challenges and extreme weather events also present new challenges which have the potential to affect the integrity of food and supply chains in this sector.

Consequently, this guidance plays a vital role in supporting businesses to protect the integrity of their supply chains, including against fraudulent activity. We know that overall, the UK enjoys high levels of food safety, but it is also an unfortunate fact that no process can guarantee that businesses will not become victims of fraudulent activity. This practical guidance aims to make that less likely. The guidance covers identifying vulnerabilities within a supply chain, and details the types of preventative measures to consider, making it suitable for small and large businesses alike.

We'd like to take this opportunity to thank all those involved in the development of this guidance, which remains a great example of what collaboration can achieve across industry, the Food Standards Agency and Food Standards Scotland.



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Introduction

The global market for herbs and spices is complex with diverse supply chains and products being sourced from a variety of businesses ranging from large scale producers to smallholders. Many herbs and spices grow wild and are farmed on a village or subsistence scale, and there are often many intermediaries in the supply chain from farmer, collector to middle-man before arrival at the origin processor / shipper ([see Supply Chain Map in Annex II](#)).

Protecting the authenticity of herbs and spices is of the utmost importance given that many are materials that may be of high intrinsic value. Food businesses need to ensure that they have appropriate controls and mitigation measures in place to prevent or detect product vulnerabilities. As with any raw material and its supply chain, the emphasis should always be on prevention rather than detection of issues. As each herb and spice is unique, this document concentrates on identifying and assessing general vulnerabilities.

The original guidance was developed by a Joint Industry Working Group comprised of representatives of the [British Retail Consortium](#), [Food and Drink Federation](#) and [Seasoning and Spice Association](#), in liaison with the [Food Standards Agency](#) and [Food Standards Scotland](#).



1.1 Scope

This document provides Industry Best Practice Guidance concerning vulnerability assessment for culinary dried herbs and spices¹ (including blends of), specifically to mitigate against potential adulteration and substitution.

1.2 How to use this guidance

The Decision Tree overleaf will lead you through this guidance to facilitate the sharing of best practice and assist companies using herbs and spices in understanding their role in assuring the authenticity of their products.

It has been developed to provide an oversight of the whole supply chain, from sourcing to placing the product on the market, whether to businesses or to the end consumer. The document has been written from the perspective of UK industry, but the principles will apply to international businesses. It is important for businesses to consider the regulatory requirements and responsibilities for the market in which they are trading.

¹ See ESA List of Culinary Herbs and Spices for major, most commonly traded products in the EU 2018 ESA Quality guidance



2. Decision tree to protect herbs and spices against supply chain vulnerabilities

Do you know what you are buying with detailed specifications?

NO → [See 2.1](#)

YES ↓

Are you buying from an approved certified supplier? ([See 2.2](#))

NO → Are there alternative controls in place? ([See 2.2](#))

YES ↓

Are you buying in whole form?

NO → ! If ground, crushed or chopped ([See 2.3](#))

YES ↓

Do you understand the factors which may influence the market?

NO → [See 2.4](#)

YES ↓

Is the price reflective of the material being purchased?

NO → ! You should consider this when deciding to purchase. ([See 2.4](#))

YES ↓

Have you assessed vulnerabilities in the supply chain? ([See 2.5](#))

Are you confident that your supplier has assessed supply chain vulnerabilities? → NO ([See 2.5](#))

YES ↓

Are appropriate controls in place to protect against vulnerabilities (preventative and / or verification and detection measures)? ([See 2.6](#))

NO → [See 2.6](#)

YES ↓

Have you reviewed the material on receipt to ensure that it meets the agreed specifications? ([See 2.7](#))

NO → [See 2.7](#)

YES ↓

Do you have procedures in place to deal with any material that does not meet the agreed specifications and / or is not legally compliant? ([See 2.8](#))

NO → [See 2.8](#)

YES →

COMPLETED

Every part of the supply chain has a role to play in assuring product authenticity, whether as growers, primary processors, herbs and spices agents and brokers, packers, food manufacturers, retailers, food service operators or wholesalers / cash and carry businesses. The principles of this Guidance can be used by any part of the supply chain. Brand owners will wish to consider their specific legal responsibilities for the safety and authenticity of their products when using this guidance. Companies should also ensure that they have strong links between procurement and regulatory / technical functions.

2.1 Product specification

The foundation of any purchasing agreement is a comprehensive specification which allows clear understanding of the nature and detail of the food in question.

Detailed specifications should include:

Botanical species

This is a key indicator which allows differentiation between two similar products. For example, in case of cassia and cinnamon, the species determines the genuine ingredient. For more information, please refer to the European Spice Association (ESA) List of Culinary Herbs and Spices.

Full description of the product

Declaration of any “standardisation processes” and all ingredients should be listed. In developing your product specification, you should also take into account any claims made on the final product (e.g. organic or origin) and any known cross-contamination or allergen risks.

Key attributes

E.g. Volatile oil content; piperine (for pepper); curcumin (for turmeric); ASTA units (for paprika); Scoville Heat Units or capsaicin content (for chillies); Picrococin / Safranal and Crocine content (for saffron); and physical attributes (e.g. particle size, grade, bulk density).

For further reference

Annex 1 provides examples of types and methods of adulteration, including recommended controls.

Provenance

Although important, is not being reviewed as part of this document. If provenance is required, this should be part of company TACCP / Supply chain risk assessment (which could include traceability back to field / farm).

2.2 Supplier assurance

Supplier Assurance is a critical action for all Food Business Operators (FBOs) to undertake when trying to ensure the authenticity of the ingredients or products that they receive. Such Supplier Assurance may include but not be limited to the following:

- Suppliers who source materials produced using Good Agricultural Practise (GAP) and Good Manufacturing Practise (GMP), both of which consider identified risks in segregation, cross-contamination and storage, will have provided a good foundation for a sound herb & spice supply chain.
- Undertaking formal risk assessments based on identified risks can assist FBOs, to ensure control, visibility and transparency of their supplies through each stage of the herb and spice supply chain from raw material, through processing, packing, storage and distribution.
- Employing targeted authenticity audits of both new and existing herb and spice supply chains will further strengthen an FBO's ability to procure only authentic materials.

2.3 Product form

For ground, crushed or chopped materials it is critical to know where the first and any subsequent such process took place and who owned the material at point of size reduction. Grinding or blending of rubbed herbs and spices is the point in the supply chain where the greatest risk of adulteration can occur and knowledge of ownership of the product at this point in the supply chain forms a key part of the risk assessment. As historically evidenced, reduction of particle size can hide adulteration and make it more difficult to detect. Dependent on the exact nature of the adulterant, suitable analytical methods to identify adulteration may already be available or may be under ongoing development.

2.4 Knowing your supply market

Understanding the factors which may influence the market will assist you in building preventative measures into your purchasing decisions. Factors which you may wish to consider include:

- Being aware of the harvest cycle which can influence availability and quality ([See Typical Harvest Chart at Annex III](#)). In general terms, new crop material typically arrives in the UK two months or more after the commencement of harvest. Therefore, if a producing origin suffers from some type of extraordinary event (e.g. hurricane) the supply can be affected either immediately or up to 18 months later, dependent on the pipeline stock position.
- Being aware of and understanding the trading market, e.g. seeking clarification if ground product is being offered below the market price of whole product as this could suggest that the product purity is in question and further investigation may be required. Market intelligence data to track price trends is available, often as a subscription service.

2.5 Understanding vulnerabilities in your supply chain

Knowing your supply chain is a key factor in understanding vulnerabilities and mitigating against them. This is an ongoing process which requires regular reviews according to the most updated and available market information from trade associations, government sources or private resource centres and may form part of the sites Vulnerability assessment, sometimes referred to as VACCP. To map your supply chain from a food authenticity perspective, consider possible vulnerabilities at each stage of the supply chain ([See Annex II](#)) and take into account the following points:

- Number of countries / regions / places and intermediaries through which the original ingredient has been processed or transited – ensure visibility and transparency of your supply chain
- History of fraud for a particular ingredient / category of ingredients, as this can point towards possible future vulnerabilities
- Seasonality and availability of supply ([See Typical Harvest Chart at Annex III](#))
- Weather events or natural disasters (i.e. drought, flood, earthquakes) that may impact supply availability
- Cultural and geo-political events (i.e. food security, terrorism, political instability) which may impact on the global supply chain of herbs and spices

- Economic indicators making fraud more attractive
- The possibility of adulteration and substitution with non-authentic materials
- Food safety laws
- Prevalence of corruption or any other cultural influences on business ethics
- Advances in technology to mask food fraud
- Additionally bear in mind the time-lag from events that may impact supply availability to noticing / identifying a food fraud issue could be as much as 12-18 months, based on time to market for some crops

Once you have mapped your supply chain from a food authenticity perspective and identified vulnerabilities you should assess and prioritise your findings and take action to mitigate the identified risks. Mitigating actions may include the preventative measures set out in Section 2 as well as the verification and detection measures set out in Section 3. The Assessment of Supply Chain Vulnerabilities is an ongoing process which requires regular review. It must be noted that herbs and spices are a relatively low volume to food / product versus other commodities, this should always be considered in risk assessment when completed in conjunction with NFCU Priority areas where economic returns are greatest.

2.6 Verification and detection measures

Prevention is always better than detection. Testing may be used to verify that preventative measures are effective and may assist in detecting issues but should not be relied on as a single control point.

2.6.1 Sampling and inspection programmes

Sampling and inspection programmes should be informed by knowledge from supply chain assurance activities as well as known vulnerabilities and horizon scanning activities ([See 4.2 Annex II](#)).

You should use a recognised statistical sampling and inspection approach, which is appropriate for the substance being tested / inspected, fit for purpose and applied consistently, to ensure that the sampling is representative of the batch ([See Appendix II “Additional references”](#)).

The ESA’s ‘Quality Minima Document’ describes key parameter limits for dried herbs and spices to inform purchasing of these products for further processing within the EU and also lists some recommended analytical methods ([see Section 3.2](#)).

2.6.2 Devising a testing strategy

It is important that you are clear about the objective of testing and what information you hope to obtain, as this will help you understand whether testing is necessary, to devise a suitable testing strategy and select a test capable of meeting your requirements.

Factors to consider in selecting an appropriate test method include the type of material to be tested and how the sample will be selected; and suitability of available test methods, including their limitations.

The type of material being tested (the matrix) can have a considerable effect on the ability to accurately detect and, where applicable, quantify the substance of interest. A test may also indicate that a substance is present when it is not, for example, due to cross-reactivity with other related species. Some cross-reactivity will be known and therefore predictable, but this is not always the case.

Herbs and spices are potentially one of the most complex and challenging matrices to analyse as they are naturally vibrant in colour which may impact testing due to their naturally occurring chemical reactive components. These challenges are increased with blended or seasoning products, which may bring about other chemical changes, and equally with composite products containing herbs and spices due to the added complexity of the matrix.

There will be cases where suitable and accurate testing methods are not currently available for the matrix of interest and the focus of assurance activity will therefore be on preventative measures.

2.6.3 Selecting a test method and laboratory

Having an informed dialogue with your testing laboratory should give you the confidence that:

- The laboratory is appropriately accredited and competent to perform the test on the required matrix
- The test method is appropriate for the matrix to be tested and meets your testing objectives
- You understand how the results of the test will be reported, to assist you in interpreting the results

Further information on suggested criteria for an organisation to be mindful of when employing the services of a laboratory / analytical service is available on the Food Authenticity Network website.

2.7 Receipt of material

Herb & spice materials should be reviewed on receipt to ensure that they meet the agreed supply specification. This will include an examination of the supplied Certificate of Analysis (COA) / Certificate of Conformity (COC) and physical examination based on a justified due diligence testing frequency (See 2.6 for guidance on Verification and Detection measures).

2.8 Procedures for non-conforming material

Herb and Spices procured that do not comply with the agreed specifications, food regulations or do not meet the agreed acceptance criteria should be treated according to the FBO's food quality documentation or the requirements of the receiving sites GFSI standard certification held and then be correctly disposed of, or returned to the supplier in a timely manner.

FBO's should also be aware of the regulatory requirements of the countries in which they trade as it is often a legal obligation to report food safety concerns to the respective authorities. Additionally, it is good practice to share information about any issues encountered with trade associations to inform industry risk assessments.





3.0 Appendices



3.1 Appendix I: Glossary

Adulteration

Adulteration is the deliberate and intentional inclusion in herbs and spices of substances whose presence is not legally declared, is not permitted or is present in a form which might mislead or confuse the consumer, leading to an imitated food and / or a product of reduced value, as well as the deliberate and intentional removal of any valuable constituent from a spice or herb.

Agents

Non-manufacturing service providers that trade between a manufacturer or broker but do not take title to the products. Such companies provide a range of services to facilitate the safe and legal trade of products.

Authenticity

Ensuring a food offered for sale is of the nature, substance and quality expected by consumers.

Blending / Mixing

Spices and herbs provide a distinct, characteristic colour and / or flavour to food but, being a natural product, these can vary depending on where they are grown, weather conditions, crop season and other natural reasons. The blending together of different qualities of the same ingredient in order to reduce the natural variation in the aromatic profile (so called “standardisation”) cannot be considered adulteration.

In other cases, blending together different qualities of the same ingredient can be done in order to achieve specific results (e.g. more or less pungency, improved machinability, improve colour). This cannot be considered adulteration either (see also Annex I).

Brokers

Companies that purchase or “take title” to product for resale to manufacturers, other brokers, retailers or food service companies but not directly to the consumer. They take legal responsibility under General Food Law and are considered to be a FBO under the terms of General Food Law.

Extraneous matter

Extraneous matter is the term used to describe the presence of plant parts that are not the required one, for example stems or seeds in a leaf product. The ESA's Quality Minima Document sets a maximum level of extraneous matter at 1% for spices and 2% for herbs. These levels can normally be achieved through a combination of Good Agricultural Practice followed by thorough physical cleaning (Good Manufacturing Practice).

3.1 Appendix I: Glossary

Food fraud

Food fraud is any suspected intentional action committed when a FBO intentionally decides to deceive customers about the quality and or content of the food they are purchasing in order to gain an undue advantage, usually economic, for themselves.

Importers / Exporters

Companies that facilitate the movement of products across national boundaries satisfying legal and customs requirements. Importers and exporters may also be agents and / or brokers.

Non-Targeted (NT) analysis

Detects one or numerous unspecified targets or data points whose results generally undergo chemometric analyses to highlight or not deviations from a reference set of non- adulterated samples.

Provenance

Geographical origin of a material.

Seasonings

Seasonings are a diverse group of dry-mixed components which are themselves used as functional ingredients in a wide variety of foods, from snacks to sauces. Seasonings may contain permitted spices, herbs, flavourings, colouring compounds, salt, starch, flavour enhancers and more, which should all be declared and listed as required of all food products

Specification

A document providing descriptive details of the product including size, colour, country of origin, botanical species and further technical details such as volatile oil content, moisture content, ash content etc where applicable.

Spent, partially spent or exhausted material

Spent, partially spent or exhausted material is the by-product of essential oil or oleoresin production. The by-product may have lost its intrinsic bioactive characteristics completely or partially depending on the extraction method applied.

Spice or herb blend

A spice blend is a blend or blended mixture of just spices and / or herbs.

Standardisation

The blending together of different qualities of the same ingredient to reduce the natural variation in the aromatic profile. This can help to ensure the spice meets desired quality parameters and standards to produce a consistent final product. This is not adulteration.

3.1 Appendix I: Glossary

TACCP

Threat Assessment Critical Control Point, a management process to defend a food supply chain from intentional contamination.

Targeted analysis

Covers detection or quantisation of one or more pre-defined analytical target(s). The analytical targets are chemically or biologically and can be either primary markers (directly addresses a specific adulteration issue) or secondary markers (indirectly provides an information on fraud).

Note: an elemental profiling to define the geographical origin is a targeted method.

Verification

Verification is defined as those activities, other than monitoring, that establish the validity of the Supply chain and provide an organisation a cost-effective assurance that suppliers are not exposing them to potential vulnerabilities.

Vulnerabilities

This is defined as the inherent vulnerability of a food ingredient to adulteration, substitution and fraud.

Vulnerability Assessment and Critical Control Points (VACCP)

Food safety system focused on identifying and managing risks of food fraud, where products are intentionally or maliciously adulterated for economic gain (e.g. substituting expensive ingredients with cheaper ones).



3.2 Appendix II: Additional references

Food authenticity

DEFRA Authenticity Methods Working Group Response to Elliott Review on 'Integrity and Assurance of Food Supply Networks.' Some Examples of Criteria for a 'Fit for Purpose' analytical Laboratory:

- [Six Principles of Analytical Best Practice to Achieve 'Fit for Purpose' Analytical Procedures](#)
- [Food Authenticity Network](#)
- [ESA Quality Minima Document](#)
- [FDF Authenticity Guide](#)
- [US Pharmacopeial Convention Guidance on Food Fraud Mitigation](#)
- [BSI Standard for Sampling Procedures for Inspection](#)
- [ESA Publication list](#)
- [GFSI Position on Mitigating the Public Health Risk of Food Fraud](#)

Food safety and labelling

- [Allergen Guidance for Food Businesses](#)
- [Hazard Analysis & Critical Control Points \(HACCP\)](#)
- [Safer Food Better Business \(SFBB\)](#)
- [Guide to Protecting & Defending Food & Drink from Deliberate Attack PAS 96:204](#)

Good agricultural & manufacturing practice

- [Safe & Local Supplier Approval \(SALSA\)](#)
- [Codex Code of Hygiene Practices for Spices & Dried Aromatic Herbs CAC/RCP 42-1995](#)
- [Importing Herbs & Spices](#)
- [GFSI Global Food Safety Initiative](#)

UK competent authorities

- [Food Standards Agency - Food Incidents](#)
- [Food Standards Scotland - Food Incidents](#)
- [National Food Crime Unit - Reporting Food Fraud](#)
- [DEFRA - Food Authenticity](#)



4.0 Annexes



4.1 Annex I: Types and methods of adulteration, including potential controls

The below table sets some examples of adulteration's types and methods, including potential controls and analytical approaches. Please note where a product is adulterated with an allergen or non-food product, it becomes a food safety issue. The below table must be considered as a guideline, a multifaceted approach is recommended when adulteration analyses are performed.

Adulteration type	Adulteration method	Recommended control
Extraneous matter from the same plant	Non-functional parts of the plants, typically added at the grinding / blending stage (e.g. deliberate addition of sticks and stems in ground black pepper)	Visual inspection, optical microscopy and / or analysis to meet the requirements on the standards of reference (BSI, ISO, ESA Quality Minima Document) (E.g. extraneous vegetable matter)
Extraneous matter from a different plant	Parts of other plants of similar appearance, typically added at the cutting / grinding / blending stage (e.g. deliberate addition of foreign plant material in oregano)	Visual inspection, optical microscopy and / or chemical target and not target analysis to meet the requirements on the standards of reference (BSI, ISO, ESA Quality Minima Document)
Exhausted also referred (spent material should not go back into the supply chain and should not be used in blending unless declared)	Undeclared addition of by-product of essential oil, oleoresin and extrusion extraction at grinding / blending stage (e.g. same plant but without bioactive principle – spent cumin in ground cumin)	Visual inspection, optical microscopy, target analysis quantitative and semi-quantitative (organic, mineral, chemical) and not target analysis. (E.g. Volatile Oil Content; Residual Solvents Analysis, Starch)
Colour enhancement	Addition of non-permitted or undeclared colour at grinding / blending stage (E.g. Sudan dyes in capsicums, oleoresin turmeric in ground turmeric)	Analysis by HPLC-MS / MS (Sudan-like dyes), LC-DAD (natural and food dyes), Heavy Metal (for mineral dyes).
Misrepresentation	Substitution with similar material of lower commercial value (e.g. undeclared cassia for cinnamon, safflower for saffron)	Optical microscopy and chemical target quantitative and semi-quantitative analysis of key attribute (organic, mineral, chemical, genetics) and not target analysis (e.g. coumarin content in cassia or microscopy for safflower in saffron, geniposide tracor in saffron, residual solvent, starch content)
Bulking	Addition of undeclared bulking agents at grinding / blending stage (e.g. starch in turmeric); potential for introduction of undeclared allergens (e.g. peanut protein through use of husks)	Target quantitative and semi-quantitative analysis of key attributes - organic, mineral, chemical, genetics (e.g. rt-PCR / q-PCR (sq)) and not target analysis e.g. NMR, FTIR, Micro FT- IR)

4.1 Annex I: cont'd – Acronyms

HPLC-MS / MS	High Performance liquid chromatography coupled with mass spectrometry (LC / MS / MS)
LC-DAD	Liquid chromatography in combination with a diode-array detector
rt-PCR	Reverse transcriptase-polymerase chain reaction
q-PCR (sq)	Quantitative polymerase chain reaction
NMR	Nuclear magnetic resonance spectroscopy
FT-IR	Fourier transform infrared spectroscopy
Micro FT-IR	Fourier transform infrared spectroscopy combined with microscopy

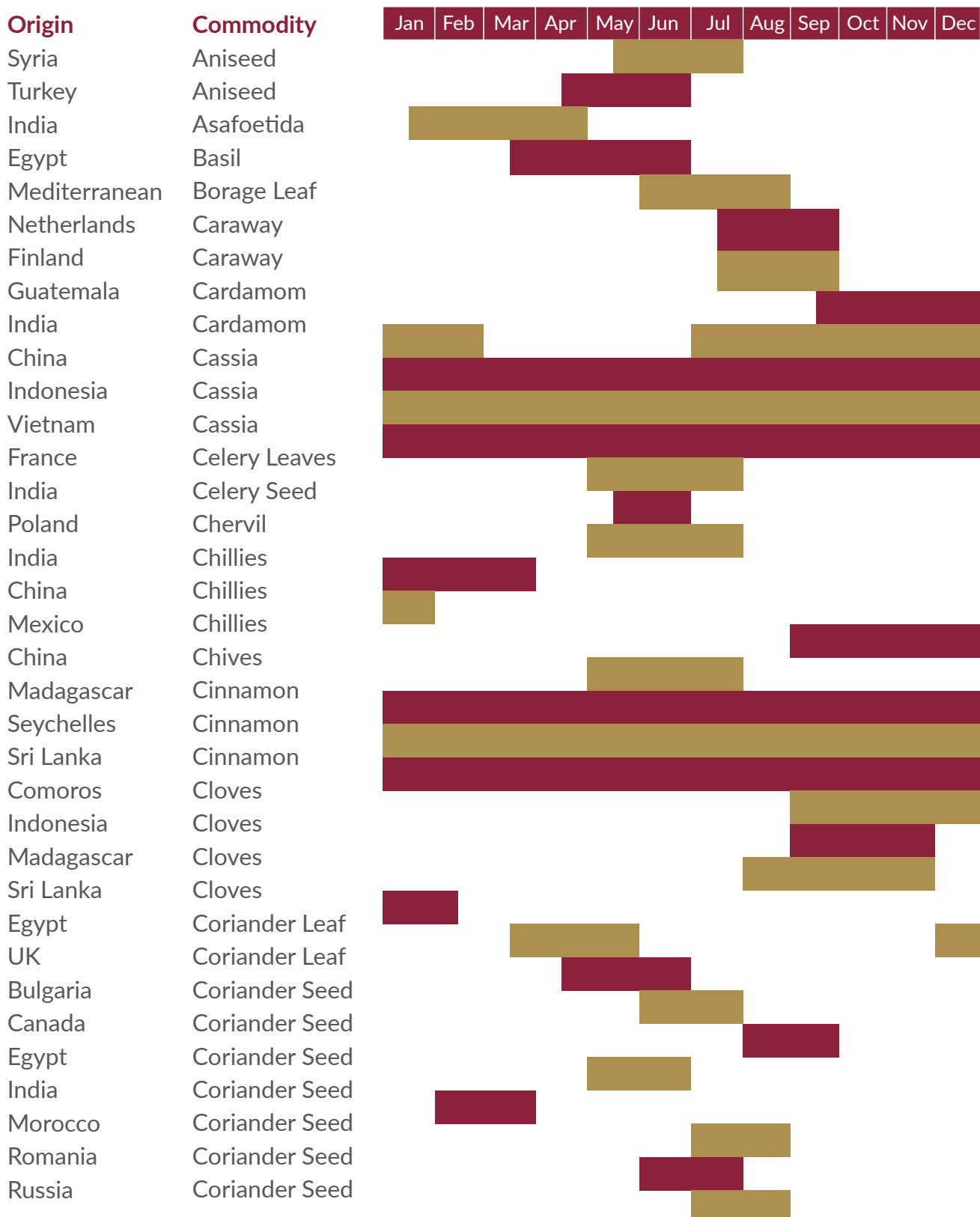


4.2 Annex II: Generic supply chain map for herbs and spices with examples of fraud vulnerabilities

The below table should be regarded as a guideline and is not intended to be exhaustive; the listed vulnerabilities may occur at various stages.

Supply chain stages	Examples of vulnerabilities
Grower	Adding non-functional parts of the plant
Collector	Loss of traceability
Primary processor	Adulteration at the grinding stage (see section 3)
Local traders	Deliberate misrepresentation
Secondary processor	Adulteration (see section 3)
Exporter	
Importer	Purchase of low grade material / mislabelling
Trader	
Processor / Packer	Substitution
Food manufacturer	
Retailer / Wholesaler	Knowingly placing mislabelled product on the market

4.3 Annex III – Typical harvest charts (Major products and origins)*



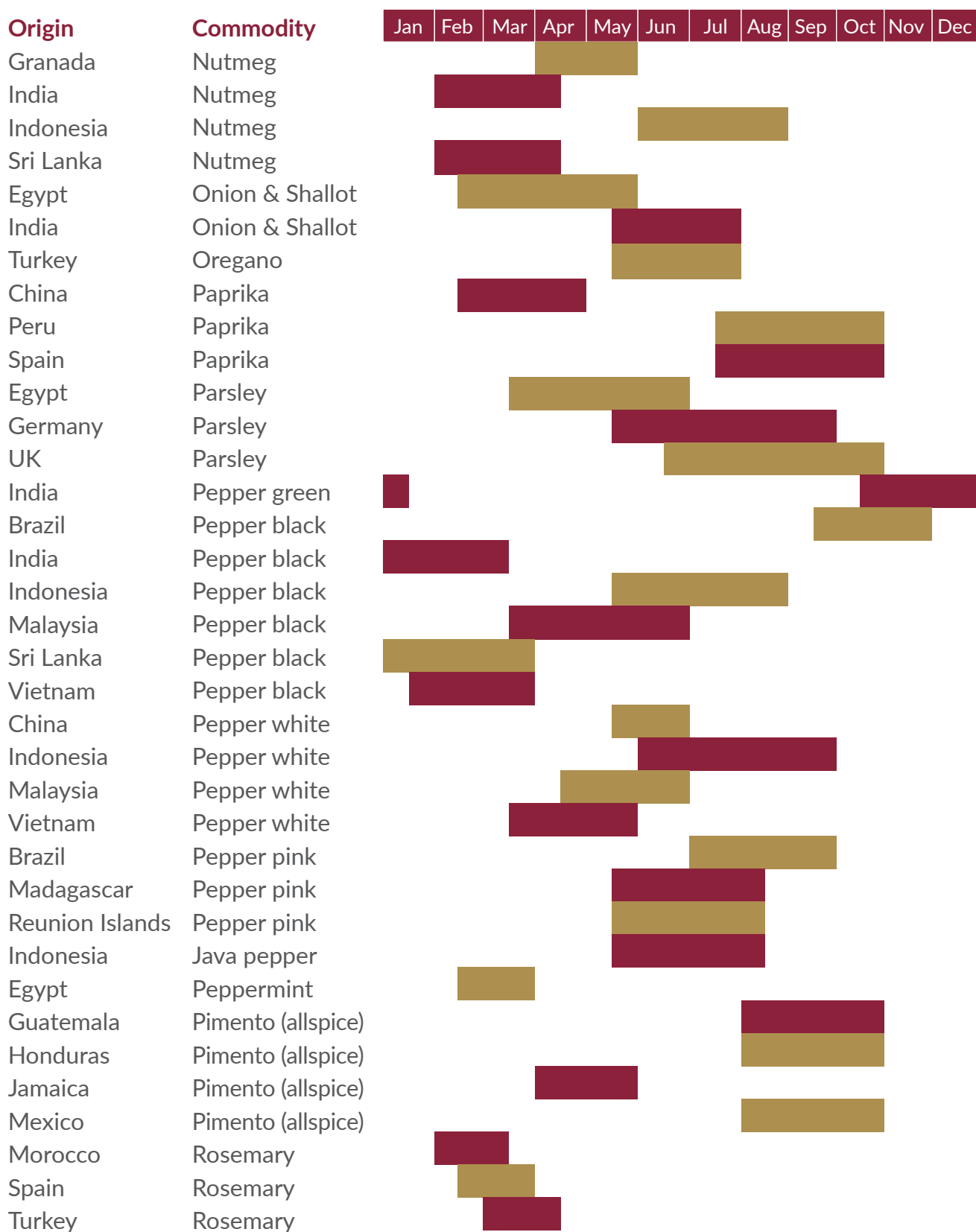
*Due to climate change, these times indicated might be affected

4.3 Annex III – Typical harvest charts (Major products and origins)*

Origin	Commodity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
India	Cumin Seed												
Iran	Cumin Seed												
Sierra	Cumin Seed												
Turkey	Cumin Seed												
India	Cumin Seed												
Sri Lanka	Curry Leaf												
India	Dill seed												
Poland	Dill tops												
Egypt	Fennel seed												
India	Fennel seed												
Egypt	Fennel seed												
India	Fenugreek seed												
Thailand	Galangal												
China	Garlic												
China	Ginger												
India	Ginger												
Nigeria	Ginger												
W Africa	Grains of Paradise												
Italy	Juniper Berries												
Macedonia	Juniper Berries												
Thailand	Kaffir lime leaf												
Turkey	Bay leaves												
UK	Lavender flower												
UK	Lavender leaf												
Thailand	Lemongrass												
Poland	Lovage leaf												
Poland	Lovage root												
Grenada	Mace												
Indonesia	Mace												
Egypt	Marjoram												
Mexico	Oregano												
Canada	Mustard seed												
India	Mustard seed												
Russia	Mustard seed												
India	Nigella seed												

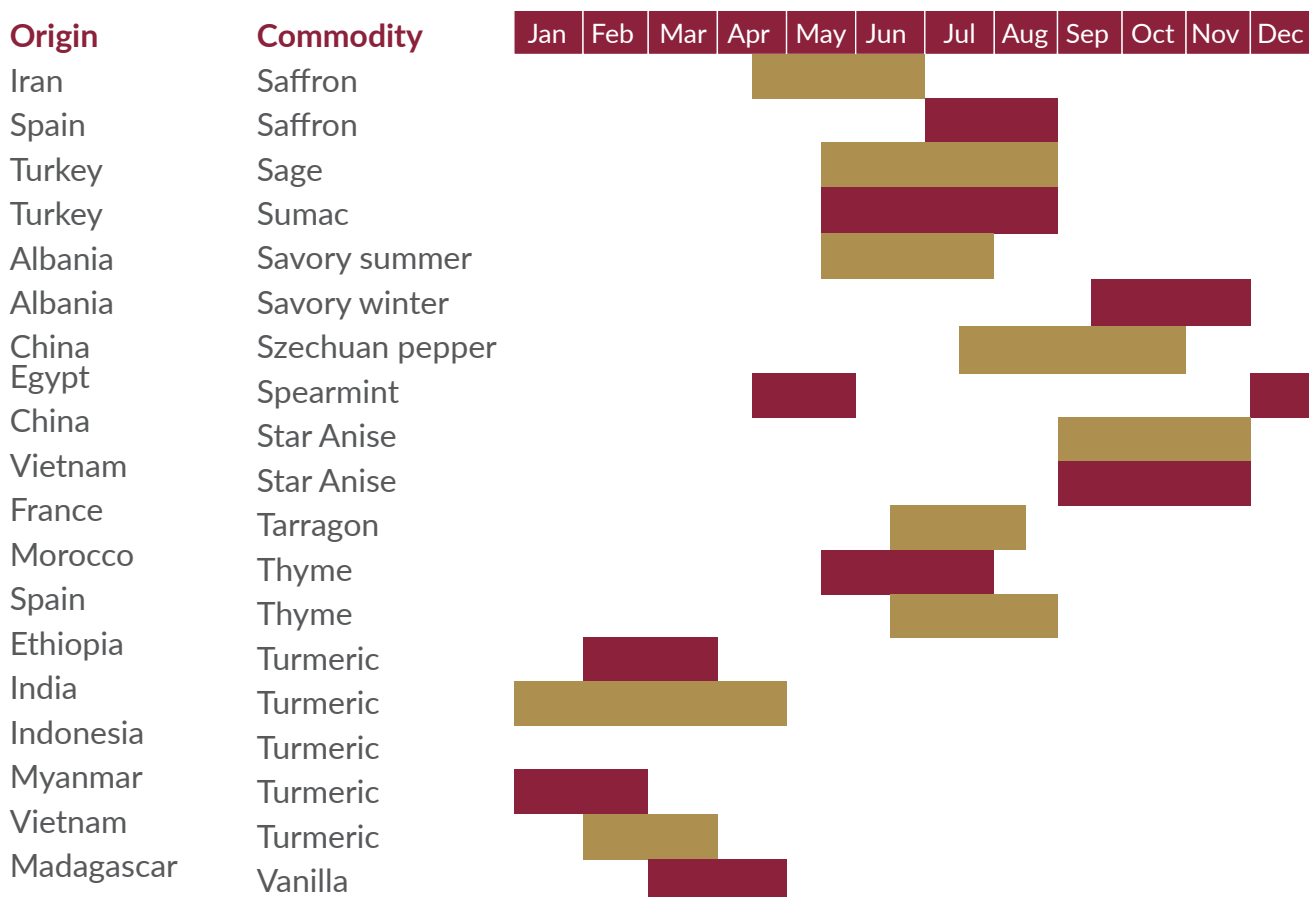
*Due to climate change, these times indicated might be affected

4.3 Annex III – Typical harvest charts (Major products and origins)*



*Due to climate change, these times indicated might be affected

4.3 Annex III – Typical harvest charts (Major products and origins)*



*Due to climate change, these times indicated might be affected



The Seasoning and Spice Association
operates under the patronage of the FDF.

Our membership comprises of leading suppliers
of spices, herbs, and seasonings across the UK.

We represent our members by communicating
with government, regulators, consumer-facing
bodies and the wider food industry.

<https://seasoningandspice.org.uk>

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