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HÀNG RÀO KỸ THUẬT THƯƠNG MẠI CỦA EU ĐỐI VỚI TRÁI CÂY TƯƠI TỪ VIỆT NAM: CƠ HỘI VÀ THÁCH THỨC

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Tóm tắt

Trong những năm gần đây, Việt Nam đã trở thành một nhà xuất khẩu quan trọng của các loại trái cây sang Liên minh Châu Âu (EU), và việc thực thi Hiệp định Thương mại tự do Việt Nam - EU (EVFTA) đã củng cố mối quan hệ thương mại này. Từ ngày 1 tháng 8 năm 2020, EVFTA đã mang lại nhiều lợi ích đáng kể cho ngành xuất khẩu trái cây của Việt Nam, chủ yếu là thông qua việc giảm thuế nhập khẩu một cách đáng kể. Tuy nhiên, bên cạnh những ưu đãi thuế quan này, EU đã áp dụng các rào cản phi thuế, đặc biệt là các rào cản kỹ thuật, gây ra cả cơ hội và thách thức cho các nhà xuất khẩu trái cây Việt Nam. Nghiên cứu này nhằm khám phá những rào cản phi thuế này áp dụng cho sản phẩm trái cây nhập khẩu vào EU, xem xét cách mà EVFTA ảnh hưởng đến việc áp dụng và thực thi các rào cản này, và đưa ra các khuyến nghị nhằm hỗ trợ các cơ quan chính phủ, các doanh nghiệp và nông dân trồng trái cây trong việc vượt qua những thách thức trong khung giao dịch mới này.

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Từ khoá: EU, Hiệp định hàng rào kỹ thuật thương mại, tiêu chuẩn kỹ thuật thương mại, xuất khẩu hoa quả tươi, Việt Nam.

**EU’S TECHNICAL BARRIERS ON VIETNAM FRESH FRUITS:
OPPORTUNITIES AND CHALLENGES**

Abstract

Vietnam has emerged as a significant exporter of fruits to the European Union (EU) in recent years, with the implementation of the Vietnam-EU Free Trade Agreement (EVFTA) further bolstering this trade relationship. Since its inception on August 1st, 2020, the EVFTA has led to substantial benefits for Vietnam's fruit export industry, primarily through the substantial reduction of import tariffs. However, despite these preferential tariff arrangements, the EU has resorted to employing non-tariff barriers, particularly technical barriers, which present both opportunities and challenges for Vietnamese fruit exporters. This research aims to delve into these non-tariff barriers imposed on fruit products imported into the EU, examine how the EVFTA influences the application and enforcement of such barriers, and ultimately provide recommendations to assist governmental bodies and fruit enterprises and growers in navigating these challenges within this new trade framework.

Keywords: EU, Technical Trade Barriers Agreement, trade technical standard, fresh fruits export, Vietnam.

1. Theory on related terms

1.1. Overview of non-tariff barriers (NTBs)

Non-tariff barriers to trade (NTBs) are defined as trade barriers that restrict imports or exports of goods or services through mechanisms other than tariffs. Unlike tax barriers, NTBs are not transparently disclosed and are often applied by governments individually to each market, making them difficult to ascertain. This characteristic makes NTBs a potent tool for trade management, they are frequently employed and exert significantly larger impacts compared to tax barriers.

NTBs can take many forms, especially for import-related barriers, each shall be employed in different situations and for particular purposes. Below is the classification of NTBs by MAST:

Table 1. Classification of NTBs by MAST

Import- related measures	Technical measures	A	Sanitary and phytosanitary measures
		B	Technical barriers to trade
		C	Pre-shipment inspection and other formalities
		D	Contingent trade-protective measures

Non-technical measures	E	Non-automatic licensing, quotas, prohibitions and quantity-control measures
	D	Price-control measures, including additional taxes and charges
	F	Finance measures
	G	Measures affecting competition
	H	Trade-related investment measures
	I	Trade-related investment measures
	J	Distribution restrictions
	K	Restrictions on post-sales services
	L	Subsidies (excluding export subsidies)
	M	Government procurement restrictions
Export-related measures	N	Intellectual property
	O	Rules of origin
	P	Export-related measures

Source: Unctad, 2015

This paper focuses solely on technical barriers, thereby narrowing down the analysis to this specific aspect.

1.2. Overview of Technical Barriers to Trade Agreement

Technical barriers fall under the category of technical measures, which is a type of import-related non-tariff measures. According to VCCI, Technical barriers are technical regulations and standards that regulate the entry of traded goods and/or the conformity assessment process.

Ostensibly, governments implement technical barriers to safeguard consumers' health and prevent environmental contaminants. However, as with other NTBs, the intentions of levying technical barriers are usually beyond these stated objectives. Exporters will encounter

discriminated treat as governments try to comply with international trade policies and pursue their protectionism purposes at the same time.

According to WTO, “the Technical Barriers to Trade (TBT) Agreement aims to ensure that technical regulations, standards, and conformity assessment procedures are non-discriminatory and do not create unnecessary obstacles to trade. At the same time, it recognizes WTO members' right to implement measures to achieve legitimate policy objectives, such as the protection of human health and safety, or the protection of the environment. The TBT Agreement strongly encourages members to base their measures on international standards as a means to facilitate trade. Through its transparency provisions, it also aims to create a predictable trading environment”.

From the above characteristics, specified in the fruit section and the realistic practices employed by the EU, the authors have categorized Technical barriers into 5 main components:

1. Sanitary standards: The standards system used by the EU to evaluate the fruit products imported into their market.
2. Regulations on residues of pesticides and impurities: The provisions regulating the level of pesticides and impurities permitted in fruit products
3. Plant inspection and conformity assessment: EU's regulations on the required quality of fruit to be imported into their market and how they are evaluated.
4. Marketing standards: Fresh fruit at all stages of production and marketing must meet quality and labeling requirements.
5. Additional requirements: Other elements required

1.3. Overview of Vietnam - EU Economic Partnership Agreement (EVFTA)

EVFTA is a new generation FTA between Vietnam and the 27 European Union member states. Coming into effect in 2020, EVFTA is one of the two FTAs with the widest scope and highest level of commitments signed by Vietnam so far. EVFTA’s main contents include Trade in goods, Rules of origin, Customs and trade facilitation, Sanitary and Phytosanitary Measures, Technical Barriers to Trade, Trade Remedies, Trade in services, Investment,... In this paper, we will focus on analyzing the Technical Barriers to Trade chapter.

Overall, EVFTA grants Vietnam various advantages in exporting fresh fruits to the enormous market of the EU. Particularly with fresh fruits, the EU commits to completely eliminate the import duties as soon as the Agreement comes into force.

Table 2. EU’s duties rate levied on Vietnamese products

HS code	Products	Average MFN rate	GSP rate	EVFTA rate
080390	Fresh or dried bananas	16%	12.5%	0%
080430	Fresh or dried pineapples	5.8%	2.3%	0%

080450	Fresh or dried guavas, mangoes or mangosteens	0%	0%	0%
080550	Fresh or dried lemons	12.8%	8.9%	0%
080711	Fresh watermelons	8.8%	5.3%	0%
081090	Fresh tamarinds, cashew apples, jackfruit, lychees,...	8.8%	5.3%	0%
...

Source: WTO, 2019

The EVFTA offers commitments to enhance transparency regarding Technical Barriers to Trade (TBT) requirements, but it does not lower or diminish any. In fact, the EU recently has been advancing its standards for imported goods. For instance, standards regarding residue levels of substances or banned substances for fresh fruits have been tightened. Since 2020, there have been numerous times Vietnamese products, including fresh fruits, have received warnings from the EU, and increased inspection frequency due to detected violations.

2. Vietnam's commitment to the EU's technical barriers

Since 2007, Vietnam has become an official member of the WTO, every trade policy related to technical standards and regulations must comply with the provisions of the TBT Agreement. Under the provisions of the TBT Agreement, Vietnam's policies must be transparent, clarified, and limit abuse to create disguised barriers to protect the domestic market, especially for infant industries.

Vietnam has established its own systems of technical standards and regulations for goods imported from international markets, known as TCVN and QCVN. The government has been continuously tightening the entry of goods and modifying its standards and regulations to ensure compliance with international ones.

The EVFTA has a chapter on Technical Barriers to Trade (TBT). Its content emphasizes the application of compliance with TBT provisions while also supplementing details to clarify the implementation process.

3. Vietnam's fresh fruits export status under the EU's technical barriers

3.1. Fresh fruit consumption trends in the EU

EU consumers show a growing interest in tropical fruits that are fresh, delicious, and of high quality, with a focus on cleanliness, sustainability, and being pesticide-free. EU importers are relatively demanding and have established long-term sources with stable partners, primarily

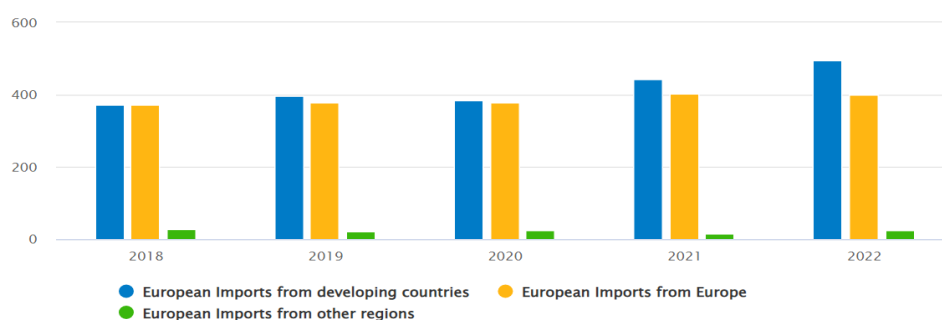
from South America and Africa (such as Peru, South Africa, Morocco, Egypt, Turkey, Costa Rica, Colombia, Panama, Kenya, Guatemala, etc.). The EU imports a significant amount of fresh fruit from developing countries, with popular choices like avocado, mango, and sweet potato. Additionally, there has been an increase in imports of uncommon tropical fruits such as lychee, passion fruit, and jackfruit.

In 2015, the EU held the title of the world's largest fruit importer, accounting for 17% of global fruit imports. Over the past five years (2015-2019), the import value of foreign fruits like lychees, passion fruit, star fruit, and dragon fruit has risen by 40% to reach 142 million euros in 2019. Rambutan and dragon fruit remain specialty items. In the first nine months of 2023, the EU imported a total value of 70.55 billion Euros (equivalent to 79.73 billion USD) worth of fruits and vegetables. This presents a significant opportunity for Vietnamese fruit and vegetable exporters.

In the EU, Germany and France are known as major markets with increasing demand for various fresh fruits. Germany accounted for 25% of the total value of EU's fresh fruit imports in 2021, mainly including avocados, blueberries, raspberries, watermelons, and sweet potatoes. France ranked second, representing 13.3% of the share in fresh fruit imports, mainly consisting of lychees, blueberries, raspberries, watermelons, bananas, sweet potatoes, and cassava. These are products that have shown significant growth in terms of production volume.

When it comes to importing fruit into the EU, the Netherlands serves as the primary gateway. More than 20% of fresh fruits and vegetables supplied by developing countries to the EU pass through the Netherlands. The value of Dutch imports of fresh fruit and vegetables from developing countries has increased by 55% between 2014 and 2018.

The main reason for the sharp increase in EU fruit imports is that fruit production in this area has almost not increased. Although agricultural production is a basic industry, the number of fruit farms in the EU is decreasing. EU farmers choose to use technology and seed development to increase productivity, extend the production season, and improve product quality and characteristics. These efforts resulted in higher product quality, but virtually no increase in output. Therefore, fruit production in the EU in the long term tends to decrease slightly, contributing to creating demand for fruit imports.



Source: ITC TradeMap

Figure 1. European imports of fresh exotic fruits (HS code 081090) by region

Source: ITC TradeMap

3.2. Vietnam's fresh fruits export status to the EU's market from 2021 to 2023

The EU's import turnover of fruit and vegetables in the first ten months of 2021 reached 156.72 billion EUR, with Vietnam's exports totaling 254.73 million EUR, reflecting a growth of 18.9%. Vietnam's market share in EU imports increased from 0.14% in 2020 to 0.16% in 2021.

In the first 11 months of 2022, Vietnam became the 59th largest fruit and vegetable supplier to the EU, with 74,000 tons valued at 215 million USD, up 7.8% in volume and 35.3% in value compared to the same period in 2021. The estimated export turnover for the whole year 2022 is around 235 million USD, driven by an increase in average import prices from Vietnam.

Despite the challenges posed by the COVID-19 pandemic, Vietnam's fruit and vegetable exports remained significant, reaching over 3 billion USD annually. With the control of the epidemic and the reopening of markets, the sector is expected to recover and increase output and export value. In 2022, fruit and vegetable export turnover is projected to reach 3.37 billion USD, with dragon fruit, durian, banana, and jackfruit being the major contributors.

By the end of the first seven months of 2023, Vietnam's fruit and vegetable exports reached 139.3 million USD, a substantial increase of 68.8% compared to the same period in 2022. The Vietnam Fruit and Vegetable Association predicts that in 2023, exports to the EU will further rise to 300 million USD, indicating a growth of approximately 20% compared to 2022.

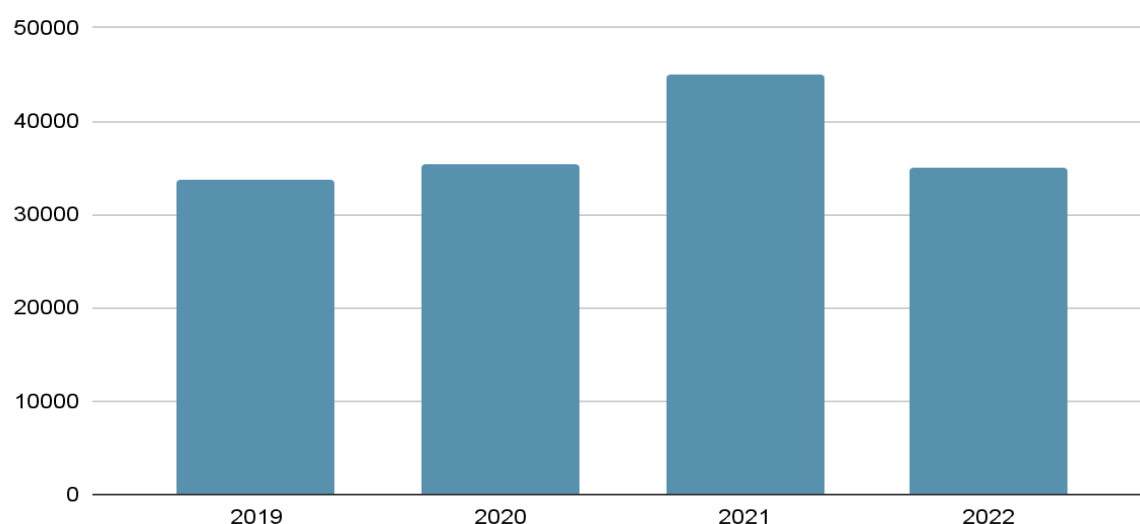


Figure 2. Vietnam fresh fruits (HS code 0810) exported to the EU (USD thousand)

Source: ITC calculations based on Association of Southeast Asian Nations (ASEAN) statistics since January, 2022

3.3. Vietnam's fruits exporting trends to the EU

According to recent data, the export of fruits from Vietnam to the EU has been following fluctuations over the years. The European Union is one of Vietnam's key markets for fruits, with popular exports including coconuts, citrus fruit, strawberries, etc. Half of them show

increasing figures, while the opposite is true for the other half, as can be seen in the graph below:

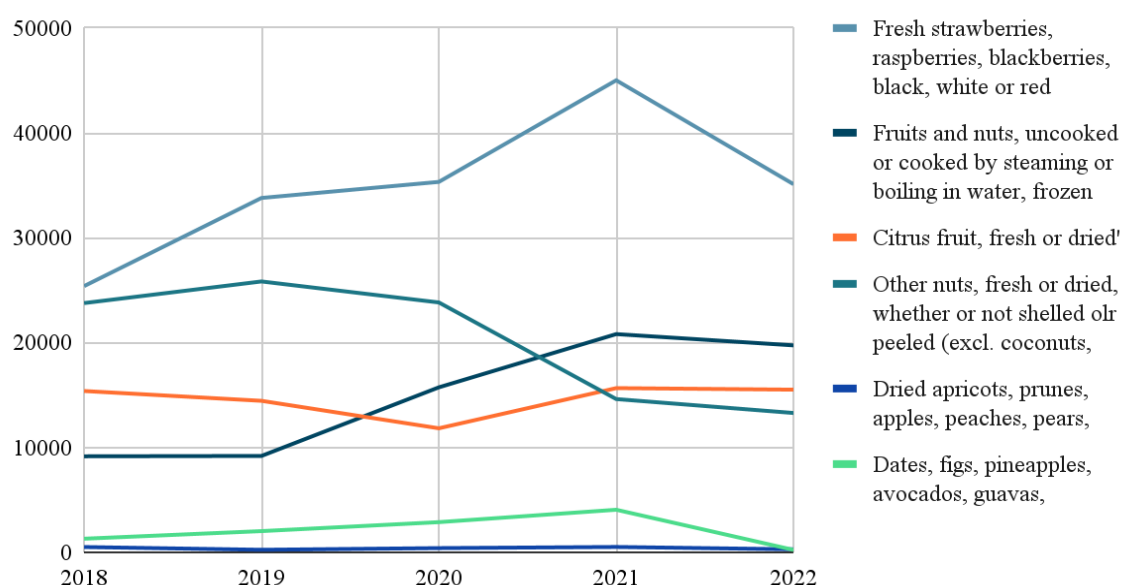


Figure 4. Vietnam's fruit exports to the European Union from 2018 to 2022

Source: Trademap

From the graph, we can see the upward oscillation in the data of Fresh strawberries, raspberries, blackberries, black, white or red currants, gooseberries; Fruits and nuts, uncooked or cooked by steaming or boiling in water, frozen; and Citrus fruit. On the opposite side, the figures for the others rose steadily till 2021, when all of them were witnessed to undergo a considerable decline. This is one of many consequences rendered by the COVID-19 pandemic.

Every year, Vietnam's export turnover of fruits and vegetables to this market grows by double digits. While the export of fruits and vegetables to the EU market reached over 200 million USD in 2022, it is expected to reach nearly 300 million USD in 2023.

And in 2024, the growth is projected to be over 20%, and businesses are still trying to increase the export turnover to the EU to maximize the advantage of tariff barriers. The remaining issue is how to control the quality, especially the issue of pesticide residue and insecticides.

Overall, despite the small downturn as a result of the COVID-19 outbreak, Vietnam's agriculture is beginning a phase of recovery and adjusting to new normal conditions. Vietnam's fresh fruit exporting trends to the EU show a promising outlook, with continued growth expected in the coming years thanks to the effort to help enterprises of ministries, sectors, localities, and the Vietnamese diplomatic post there.

3.4. EU's technical standards for Vietnam's fruits

The export of fresh fruits from Vietnam to the EU is subject to strict regulations and quality standards set by the EU authorities. Vietnamese fruit exporters need to comply with these regulations to ensure their products meet the required standards for entry into the EU market.

3.4.1. Sanitary standards

The EU demands that foreign food companies comply with critical hazard analysis and control points (or HACCP). The requirement to apply HACCP to EU imports is more stringent than many other markets.

3.4.2. Regulations on residues of pesticides and impurities

The EU has regulations on maximum residue levels (MRLs) for plant protection products in foodstuffs to protect consumer health and the environment in Regulation (EC) No. 396/2005¹. All imported food products will be withdrawn from the EU market if they contain illegal plant protection products or if their residual levels exceed the limits set by the Regulation.

Compared to other Vietnamese export markets, the EU's default MRLs are very low and the number of plant protection drugs approved by the EU is low. EU principles on control of food impurities are detailed in Council Regulation No. 35/93/EEC and lay down maximum levels for food contaminants specified in Commission Regulation No. 1881/2006. Limit content with impurities is updated regularly. The most common impurities in fruit products (fresh, dried, and frozen) are fungal toxins (aflatoxins, ochratoxin A, patulin), **heavy metals** (blue, tin, and cadmium), and micro-impurities (salmonella, norovirus, and hepatitis A virus).

Table 3. EU regulations on maximum levels of lead and cadmium impurities in fresh fruits

Maximum level of lead	
Fruits, excluding cranberries, blackcurrants, elderberries and strawberries	0.10 mg/kg net weight
Cranberries, blackcurrants, elderberries and strawberries	0.20 mg/kg net weight
Maximum levels of cadmium	
Fruits	0.050 mg/kg net weight

Source: TTWTO VCCI

3.4.3. Plant inspection and conformity assessment

The European Commission Directive 2000/29/EC sets regulations for plant control conditions in the EU. It prohibits certain imports and requires a phytosanitary certificate for controlled products. Imported products receive a plant passport upon entry and can freely circulate within EU Member States.

To ensure compliance with EU regulations on food safety and plant health, the EU applies precautionary principles, allowing temporary precautions even without scientific evidence if

there is a potential risk to human or plant health. This principle is seen by many countries as a protective measure adopted by the EU.

3.4.4. Marketing standards

Compliance with the marketing standards for fresh fruit in the EU market is mandatory. EU Regulation 543/2011 regulates marketing standards for the quality and ripeness of fresh fruits. The marketing standards are divided into two categories: (i) the specific marketing standards (SMS) are applied to 10 fresh vegetables and (ii) the Common Marketing Standards (GMS) apply to other fresh vegetable products.

Both SMS and GMS products must comply with common standards of quality and minimum maturity, relative to the Codex standard with fresh fruits. Fresh fruit imports are checked by the Member State's competent authorities at the EU border. If the product has been tested in the country of origin, that country may require a Product Certificate of Conformity from the EU.

Of all Vietnam's fresh fruit exports to the EU market, only Lemon is an SMS product, the rest of which are subject to GMS regulation. No Vietnamese fruit has been approved for EU compliance testing.

3.4.5. Additional requirements

Along with conforming to EU's compulsory importing regulations, importers also require importing products have other safety certificates:

- **Global GAP Certificate:** Global Good Agricultural Practice Certificate is required by almost all supermarkets and retailers in the EU regarding fresh fruits and has gradually become a minimum standard of fresh fruits imported into the EU
- **BRC Certificate:** Certificate of Food Safety issued by the British Retail Consortium is usually required by Northwestern European countries.
- **IFS, SQF, FSSC 22000 Certificates:** Importers in EU countries can require other certificates like IFS (International Featured Standard), SQF (Safe Quality Foods), FSSC 22000 (Foundation for Food Safety Certification)

In addition to the certifications mentioned above, social and environmental issues are also important to EU customers. Therefore, they are concerned about how a product's origin and manufacturing process impact society and the environment (e.g., child labor, forced labor, etc.). Eco-friendly goods and companies that make significant social contributions will consequently enjoy greater recognition and draw in more EU customers.

4. Evaluations and recommendations for Vietnam's fresh fruit export

4.1. Strengths

Climate conditions and favorable soil create Viet Nam huge advantages in growing a variety of fruits. Viet Nam has a lot of large areas specializing in growing fruit trees, in which the South is considered the largest fruit- growing area in the country. Some fruits have become

specialties of regions and developed into reputable brands such as Thanh Ha lychee, Hoa Loc mango, etc. In addition, Viet Nam has some fruits that could be grown in very few countries, and fruits grown in Viet Nam have distinctive flavor, which creates competitive advantage for this country. To exemplify, Viet Nam's dragon fruit is assessed as the most delicious, making it the biggest supplier in the world.

Regarding labor, Viet Nam has an abundant source owing to the young population. According to the General Statistics Office of Viet Nam, Viet Nam is in a golden population structure with 63,8% of the population is in the age of 15-59, which is a strength to develop the fruit industry. Furthermore, most manual workers live in rural areas where fruits are grown. This ensures an available labor source for cultivating fruits.

4.2. Weaknesses

The synchronization and integration in Vietnam's fruit and vegetable production are still not high. We do not have large-scale production regions that ensure quality and stable supply to meet export demand.

In addition, post-harvest preservation and processing, as well as technology to ensure shelf life in the EU market, are still limited. Issues related to packaging, labeling, and design are not yet in line with the preferences of European consumers.

Furthermore, the high cost of logistics transportation in recent times has impacted the distribution cost of fruit and vegetable products in the EU market, reducing competitiveness compared to competitors such as South America, Africa, and West Asia.

4.3. Opportunities

EVFTA opens up an opportunity for Viet Nam to diversify its markets and penetrate into a potential market whose population has reached 500 million with huge purchasing power. In addition, after the EVFTA came into effect, Viet Nam's fresh fruits have received significant tariff incentives. To be specific, 520 of 556 tariff lines have been reduced to 0%. Not only reducing tariffs for some particular goods, the EU also protects 39 geographical indications of Viet Nam namely Thanh Ha Lychee, Luc Ngan Lychee, Ninh Thuan grapefruit, Hoa Loc mango, Bac Kan kumquat, etc. This creates a huge advantage for Viet Nam to compete against the agricultural products of other Asian countries, for example, Thailand and China that do not have FTAs with the EU.

On the other hand, the EU's technical barriers also allow Vietnamese enterprises to upgrade themselves, and improve the cultivation and harvesting process, packaging, etc. In order to surpass the requirements of such a demanding market, fruit growers must apply advanced technology in cultivation and amend the growing and preserving process to enhance the quality of fresh fruit. EVFTA is also believed to make way for further cooperation between Vietnam and the EU in terms of equity, science and technology, and more efficient management.

4.4. Challenges

EU's technical barriers pose challenges for VN's fresh fruit to overcome.

Firstly, Vietnam faces capacity and resource constraints in meeting EU's technical regulations and standards. The EU has the strictest requirements for imported food, especially fresh fruit, where a GLOBAL GAP certificate is mandatory. However, complying with this quality management system is challenging for developing countries like Vietnam due to limited human resources and technology. Many farmers lack training in modern methods and technology, hindering their understanding and implementation of complex principles and procedures. Additionally, adhering to EU regulations is expensive for Vietnamese farmers, highlighting the need for long-term investments in human capital, technology, and financial preparation.

The second major challenge faced by Vietnamese enterprises and fruit growers is the lack of information and guidance on the constantly changing regulations of the EU market. This is due to the absence of a dedicated legal unit within farms and enterprises to research foreign markets, as well as a lack of resources to hire experts in the field. Additionally, support from the Vietnamese government and business associations is limited, with the Ministry of Agriculture and Rural Development being the primary source of information. However, this information is mainly available through online portals without guidance or translation, making it difficult for businesses to access and comprehend. Moreover, seminars and workshops addressing these issues are primarily held in major cities like Hanoi and Ho Chi Minh City, while most fruit growers are located in rural and mountainous areas.

Thirdly, Vietnam has to deal with poor cooperation in the supply chain of exports. Most Vietnamese fruit growers are households with small farms. Fruit exporters collect fruits from various farms without long-term contracts, which makes it difficult for exporters to inform and guide farmers on the EU's regulations. Additionally, collecting fruits from various separate farms raises issues of quality and quantity management as the quality of fruits of each farm can be different and the quantity without a commitment can be unstable.

The fourth challenge lies in inadequate infrastructure to facilitate exports. Most fruits are often grown in rural and mountainous areas where transportation infrastructure is undeveloped, which increases both the time and the fee of transportation. Moreover, as the harvesting and storage technology of Vietnam is still poor, the quality of fresh fruits is significantly affected, leading to a failure in meeting EU's standards.

4.5. Recommendations

4.5.1. Recommendations for growers

Farmers must proactively update their knowledge and information about EU regulations on imported fruits through books, social media, the government's website, or professional advice. At the same time, growers must strictly adhere to quality assurance production processes to meet the increasingly high standards of demanding markets such as the EU. They should not prioritize short-term gains over complying with food safety requirements, especially regarding pesticide residues. It is also essential for farmers to improve their tools and modernize their farming and harvesting practices to ensure the quality of fresh fruits meets export standards.

4.5.2. Recommendations for enterprises

To leverage the benefits of the EVFTA (EU-Vietnam Free Trade Agreement) and meet the EU's demand for imported fruits, businesses must be aware of and understand EU regulations. They can consult the TBT and SPS information portals or directly search for regulations on the European Commission's online portal. The Trade Helpdesk for foreign exporters offers detailed information and guidance on EU measures. The EU Trade Helpdesk keeps businesses informed about all legal requirements.

Moreover, implementing a quality management system is essential. Investing in systems like HACCP and Global GAP allows Vietnamese fruit producers to boost exports to the EU and gain access to other high-demand markets. Additionally, it is important to note that EU importers may require additional food safety certifications, such as the International Food Standard (IFS), depending on the market. Exporters should research and confirm the specific quality management and food safety certifications demanded by their partners.

Thirdly, enhancing export staff's capacity or hiring export consulting services is crucial. Vietnamese fruit export businesses, mostly small and medium-sized enterprises, often lack proficiency in foreign languages and legal knowledge needed to understand and comply with EU regulations. To overcome these weaknesses, businesses should invest in staff training or seek assistance from legal consulting firms. Although it may incur additional costs, the enterprises can gain long-term benefits including reduced import rejections and increased export value to the EU.

Fourthly, it is crucial to strengthen linkages within the fruit export supply chain. Key stakeholders involved in the supply chain, alongside exporters, include farmers, EU fruit importers, and transporters. Farmers are a crucial component that needs to be taken care of from the beginning to ensure control over pesticide residues and contaminants in the fruits. Exporting businesses can provide production guidelines to farmers and establish contracts to guarantee market outlets for agricultural products.

Besides, regular communication is vital for EU fruit exporters to stay updated on regulations and align standards. Exporters should research and engage with importers, distribution channels, and retail systems in the Netherlands to strategize fruit exports to the Netherlands and the EU. Moreover, when selecting transporters, it's crucial to choose reputable service providers that prioritize fruit safety, quality, and cost optimization.

4.5.3. Recommendations for the government

First, improving knowledge dissemination on EU import regulations is important. Lack of information often leads to business obstacles. Therefore, the government should diversify channels to deliver EU regulations to producers and exporters, conduct workshops and train on compliance for export businesses and rural fruit growers. TBT and SPS portals should provide Vietnamese summaries of new EU regulations. The government should also utilize social media platforms for announcements and Q&A sessions.

The second recommendation is investing in processing facilities and fruit export technologies. The government should establish accredited laboratories to address issues like

pesticide residues. They also need to upgrade transportation systems for efficient fruit transport. Furthermore, it is crucial to invest in research and development for pest-resistant varieties, improved harvesting processes, and preservation technologies to extend fruit shelf life for EU markets.

Thirdly, the role of the state in planning, directing, and managing production is particularly important. To ensure high-quality products, it is necessary to have concentrated production areas and apply consistent care and harvesting processes. The quality of fruits cannot be guaranteed if each household or farm cultivates in a different manner.

Fourthly, utilizing the EVFTA to increase fruit exports is important. Under Article 10 of the EVFTA's SPS Chapter, Vietnam can seek the EU's recognition of equivalence in SPS measures for certain products. The EU will assess equivalence upon request, and if recognized, it will save time and money for Vietnamese exporters. This also reduces the risk of shipments being rejected at EU borders after passing inspections in Vietnam. Furthermore, the EU has pledged to help Vietnam address compliance issues related to EU SPS measures.

Last but not least, enhancing the promotion of the image is crucial. Even if granted EU import licenses, without effective branding and marketing activities to reach consumers, the desired level of consumption for Vietnamese fruit products may not be achieved.

Conclusion

The potential of Vietnam's fruit export market is significant, particularly in light of cooperation with major commercial entities like the EU and the implementation of agreements such as the EVFTA. This has opened up numerous opportunities for Vietnamese fruit exporters, particularly in terms of preferential import tariffs, thereby expanding the sector's potential. However, amidst these tariff benefits, the EVFTA also presents challenges in the form of technical barriers to trade imposed by the EU. These non-tariff barriers necessitate immediate attention from Vietnamese fruit exporting enterprises to ensure compliance with stringent requirements and sustainably develop the industry. Despite the efforts put forth in this research, limitations exist due to constrained personal qualifications and challenges in accessing relevant information. Feedback and recommendations are sought to address these shortcomings and enhance the effectiveness of proposed solutions for both governmental authorities and businesses operating in Vietnam's fruit export sector.

REFERENCES

Vietnamese Materials

An, A (2023), “Xuất khẩu rau củ sang EU: Tận dụng lợi thế từ Hiệp định EVFTA”, *Ministry of Industry and Trade of The Socialist Republic of Vietnam*, Available at: <https://moit.gov.vn/tin-tuc/thi-truong-nuoc-ngoai/xuat-khau-rau-cu-sang-eu-tan-dung-loi-the-tu-hiep-dinh-evfta.html> (Accessed 15 February, 2024).

An, H (2023), “EVFTA và cam kết nhập khẩu hàng hoá giữa Việt Nam và Đức”, *Ministry of Industry and Trade of The Socialist Republic of Vietnam*, Available at: <https://moit.gov.vn/tin-tuc/thi-truong-nuoc-ngoai/hiep-dinh-evfta/evfta-va-cam-ket-ve-nhap-khau-hang-hoa-giua-viet-nam-va-duc.html> (Accessed 19 February, 2024).

An, S (2023), “Xuất khẩu nông sản sang thị trường EU phải đáp ứng các tiêu chuẩn theo EVFTA khat khe cỡ nào”, *Ministry of Industry and Trade of The Socialist Republic of Vietnam*, Available at: <https://moit.gov.vn/tin-tuc/thi-truong-nuoc-ngoai/xuat-khau-nong-san-sang-thi-truong-eu-phai-dap-ung-cac-tieu-chuan-theo-evfta-khat-khe-co-nao.html> (Accessed 15 February, 2024).

Bộ Công Thương (2023), “Xuất Khẩu Rau củ sang EU: Tận Dụng Lợi Thế TỪ Hiệp định EVFTA”. Available at: <https://moit.gov.vn/tin-tuc/thi-truong-nuoc-ngoai/xuat-khau-rau-cu-sang-eu-tan-dung-loi-the-tu-hiep-dinh-evfta.html#:~:text=Theo%20s%E1%BB%91%20li%E1%BB%87u%20t%E1%BB%AB%20C%C6%A1,v%C3%A0o%20kho%E1%BA%A3ng%20235%20tri%E1%BB%87u%20USD.> (Accessed: 18 February 2024).

Báo Đảng Cộng Sản (2021), “Người Tiêu Dùng EU có Xu Hướng Tiêu Thụ Trái Cây nhiệt đới”, Available at: <https://dangcongsan.vn/kinh-te-va-hoi-nhap/nguoi-tieu-dung-eu-co-xu-huong-tieu-thu-trai-cay-nhiet-doi-596069.html> (Accessed: 18 February 2024).

Nguyễn, T. M. (2022) “Vietnam’s quest to turn fruit export potential into power”, *VietnamPlus*, Available at: <https://en.vietnamplus.vn/vietnams-quest-to-turn-fruit-export-potential-into-power/237302.vnp> (Accessed: 18 February 2024).

Phạm, K. O. (2021), “Hướng đi cho xuất khẩu nông sản Việt Nam sang thị trường EU”, *Tạp chí Nghiên cứu Công nghiệp và Thương mại - VIOIT*, Available at: <https://vioit.org.vn/vn/chien-luoc-chinh-sach/huong-di-cho-xuat-khau-nong-san-viet-nam-sang-thi-truong-eu-4390.4050.html> (Accessed 16 February, 2024)

Quang, C. (2024), “Tăng cường xuất khẩu trái cây sang thị trường EU”, *Bộ Công thương*, Available at: <https://thongtincongtuong.vn/tang-cuong-xuat-khau-trai-cay-sang-thi-truong-eu/> (Accessed 19 February, 2024)

Hà, H. T. T. (2022), “Thúc đẩy xuất khẩu trái cây sang EU tận dụng cơ hội từ EVFTA: Kinh nghiệm từ địa phương”, *TBT An Giang*, Available at: <http://tbtagi.angiang.gov.vn/thuc-day-xuat-khau-trai-cay-sang-eu-tan-dung-co-hoi-tu-evfta-kinh-nghiem-tu-dia-phuong-65646.html> (Accessed 16 February, 2024)

Tuyên, L. V. (2022), “Xuất khẩu trái cây Việt Nam sang EU trong bối cảnh thực thi EVFTA: Rào cản kỹ thuật và kiến nghị”, *TBT An Giang*, Available at: <http://tbtagi.angiang.gov.vn/xuat-khau-trai-cay-viet-nam-sang-eu-trong-boi-canhthuc-thi-evfta-rao-can-ky-thuat-va-kien-nghi-62595.html> (Accessed 3 February, 2024)

Đức, L. V. (2023), “Ba năm xuất khẩu nông sản, rau quả sang EU theo EVFTA: Bài học kinh nghiệm”, *Tạp chí Kinh tế nông thôn*, Available at: <https://kinhtenongthon.vn/Ba-nam-xuat-khau-nong-san-rau-qua-sang-EU-theo-EVFTA-Bai-hoc-kinh-nghiem-post58548.html> (Accessed 19 February, 2024)

VCCI. (2022), “Việt Nam sau 02 năm thực thi hiệp định EVFTA, từ góc nhìn doanh nghiệp”, Available at: <https://trungtamwto.vn/file/22071/evfta-final.pdf> (Accessed 17 February, 2024)

TTWTO VCCI. (2022), “Các yêu cầu của EU đối với sản phẩm rau quả nhập khẩu”, Available at: <https://trungtamwto.vn/thi-truong-duc/19572-cac-yeu-cau-cua-eu-doi-voi-san-pham-rau-qua-nhap-khau> (Accessed 21 February, 2024)

VNTR (2024), “HIỆP ĐỊNH THƯƠNG MẠI TỰ DO VIỆT NAM - EU (EVFTA)”, Available at:
<https://vntr.moit.gov.vn/vi/fra/31/2#:~:text=Theo%20cam%20k%E1%BA%Bft%2C%20ngay%20khi.ng%E1%BA%A1ch%20xu%E1%BA%A5t%20kh%E1%>

VietnamCredit. (2022), “VIETNAM’S FRUIT AND VEGETABLE EXPORTS IN 2022: CHANCES AND CHALLENGES”. Available at: https://vietnamcredit.com.vn/news/vietnams-fruit-and-vegetable-exports-in-2022-chances-and-challenges_14626#:~:text=In%202022%2C%20it%20is%20forecast,requirements%20from%20the%20EU%20market. (Accessed: 18 February 2024).

English Materials

CBI. (2024), “The European market potential for exotic fruit”, Available at: <https://www.cbi.eu/market-information/fresh-fruit-vegetables/exotic-tropical-fruit/market-potential> (Accessed: 18 February 2024).

UNCTAD. (2024), “Classification of NTMs”, Available at: <https://unctad.org/topic/trade-analysis/non-tariff-measures/NTMs-classification> (Accessed 17 February, 2024)

UNCTAD. (2018), “The Unseen Impact of Non-Tariff Measures: Insights from a new database”, Available at: https://unctad.org/system/files/official-document/ditctab2018d2_en.pdf (Accessed 17 February, 2024)

VCCI. (2017), “Summary of Vietnam-EU Free Trade Agreement (EVFTA)”, Available at: <https://wtocenter.vn/chuyen-de/12781-summary-of-vietnam-eu-free-trade-agreement-evfta> (Accessed 17 February, 2024)

VCCI. (2024), “EVFTA commitments on Technical Barriers to Trade (TBT)?”, Available at: <https://wtocenter.vn/german-market/19026-evfta-commitments-on-technical-barriers-to-trade-tbt> (Accessed 17 February, 2024)

WTO. (2024), “Technical barriers to trade”, Available at: https://www.wto.org/english/tratop_e/tbt_e/tbt_e.htm (Accessed 17 February, 2024)

Vietnam News. (2017), “Vietnam veg, fruit exporters must up safety standards”, Available at: <https://wtocenter.vn/chuyen-de/12979-vietnam-veg-fruit-exporters-must-up-safety-standards> (Accessed 18 February, 2024).

VCCI. (2019), “Vietnamese Fruits overcome barriers to accessing EU market, takes advantages of opportunities brought under the EVFTA”, Available at: [nghiencuu \(chongbanphagia.vn\)](http://nghiencuu.chongbanphagia.vn) (Accessed 18 February, 2024)

VietNamNet (2014), “Vietnamese Fruits”, Available at: [Vietnamese fruit \(vietnamnet.vn\)](http://vietnamnet.vn)