

NAMIBIA FATTY OILS
EXPORT GUIDE
FOR **MSMEs**





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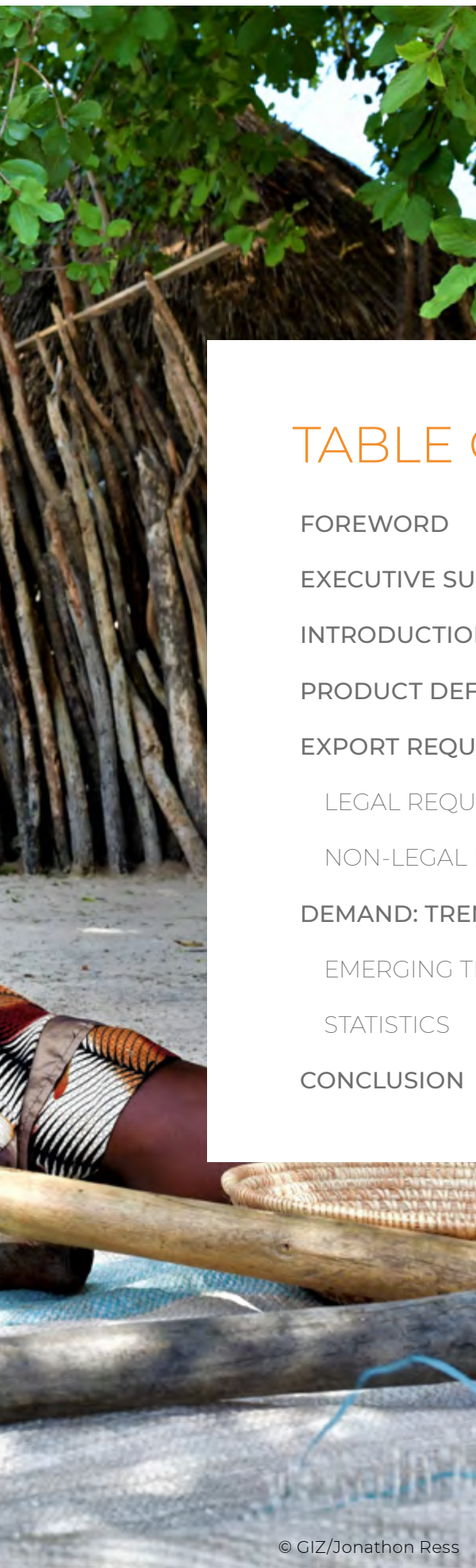


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FOREWORD

The Namibia Investment Promotion and Development Board (NIPDB) is pleased to present the first edition of our guide series, aimed at enabling and empowering local Micro, Small and Medium Enterprises (MSMEs) to access international markets and trade globally.

In an era where beauty knows no borders, the global demand for high-quality cosmetics has surged to unprecedented levels. Engagement with various Namibian MSMEs who operate in this sector has demonstrated that the local cosmetics industry is deeply committed to excellence, innovation and ethical business practices; thus, it is pertinent to understand the importance of navigating the complexities of the international market. This guide is not just a collection of information; it is a testament of our dedication to support your journey towards global success. I am honoured to share this comprehensive resource with you, designed to empower MSMEs in the dynamic world of cosmetics export.

Over the years, Namibian brands have established themselves as trusted names in the European cosmetics industry. Your commitment to delivering exceptional products, coupled with a steadfast focus on sustainability and customer satisfaction, has enabled the sector to transcend geographical boundaries. Through this guide, we aim to share knowledge and experience, providing especially new entrants with insights and strategies that can elevate your cosmetics export endeavours to Europe and the world.



“ Over the years, Namibian brands have established themselves as trusted names in the European cosmetics industry.

Navigating the intricate landscape of international trade requires a blend of industry expertise, adaptability, and a keen understanding of diverse cultures. This guide has been meticulously crafted to serve as your companion, offering practical advice, market trends, and regulatory insights to help you make informed decisions. Our goal is to equip you with the tools needed to penetrate and thrive in the European cosmetics arena.

The global cosmetic market is characterised by its diversity, with consumers around the world having unique preferences and beauty standards. This guide takes a holistic approach, encompassing key aspects such as market research, regulatory compliance, packaging and labelling considerations and logistics management, to name but a few. By delving into these critical components, it equips you with the know-how to tailor your products effectively to the European market while ensuring compliance with local regulations.

As we delve into the complexities of international trade, we cannot overlook the pivotal role played by innovation and sustainability in the cosmetics industry. Modern consumers are increasingly conscientious about the environmental impact of their beauty choices. This guide provides valuable insights into sustainable practices, highlighting the importance of aligning export strategies with global efforts toward a more sustainable and eco-friendly future.

The success of any export venture is rooted in collaboration and partnerships. I would like to emphasise the importance of building strong networks, both domestically and internationally, fostering relationships with distributors, retailers and regulatory bodies. By cultivating these connections, you can navigate the intricate web of international trade more effectively and establish a solid foundation for long-term success.

As you embark on this journey, remember that success is not only measured by financial gains, but also by the positive impact that you can create for the local and global communities alike. The cosmetics industry has the power to inspire confidence, promote diversity and celebrate the beauty that exists in every corner of our planet.

May this Namibia Fatty Oils Export Guide serve as a source of inspiration and knowledge, propelling your business towards new horizons.

Nangula Nelulu Uaandja

Chairperson and Chief Executive Officer

Namibia Investment Promotion and Development Board

EXECUTIVE SUMMARY

Namibia's BioTrade sector contributes to the livelihoods of thousands of people at different levels of the supply and value chains, respectively. The Namibian Government has made efforts to propel the sector forward through the development of the Growth at Home Strategy in 2013. This national strategy was the basis for the formation of Namibia's health and personal care industry and associated value chains. The cosmetics and pharmaceutical sector has grown over the years resulting in a diverse range of products now available.

Namibian fatty oils have successfully carved out a significant market niche in Europe, owing to their exceptional quality and diverse applications. Renowned for their purity and unique composition, Namibia's fatty oils, such as marula and manketti, have gained popularity in the European cosmetic and skincare industry. These oils are rich in essential fatty acids, antioxidants and vitamins, making them ideal ingredients for high-end beauty products.

European consumers are increasingly drawn to the natural and sustainable sourcing practices employed in Namibia, further boosting the oils' appeal. As a result, Namibian fatty oils have become sought-after components in European formulations, establishing a robust presence in the continent's thriving beauty and wellness market.

One of the key challenges faced by producers is market access for their products, be it formulated products or ingredients extracted from biological resources for the food or flavour industry. There are barriers to market entry such as correct packaging, quality assurance, adherence to international standards, compliance with legislative requirements etc. These factors and many more limit the ability of producers to successfully export their products.

This guide aims to provide relevant information pertaining to exporting of biological resources, specifically fatty oils. Using Marula oil as an example, the guide provides a comprehensive overview of various aspects as it relates to the export of fatty oils to Europe. This guide is primarily intended for first-time exporters and it gives a breakdown of the key areas for consideration. In future, additional guides will be drafted for various local ingredients and products for strategic export markets i.e. Africa, Asia and the United States, amongst others.

This guide was developed by the Namibia Investment Promotion and Development Board (NIPDB) with the support of Sequa, Agency for Business and Economic Development and GIZ BioInnovation Africa project.

INTRODUCTION TO MARULA OIL

The Marula tree (*Sclerocarya Birrea*) has been woven into the culture of the Ovambo people for thousands of years. The fruit is an important food source for humans and animals alike, and elephants are known to travel for many kilometres to feast on its bounty.

Marula has also been recognised for its nutritious oil, a valuable ingredient used in beauty and skin products, prized for its moisturising qualities and chemical stability. Marula Oil is naturally rich in Vitamin E and is renowned for its anti-ageing properties. Source: [Marula Oil](#) | [Desert Secrets](#)

While this guide primarily focuses on Marula oil as an example, it's important to note that there are other fatty oils worth mentioning such as Ximenia, Kalahari Melon and Manketti.

Ximenia Oil: The Ximenia Oil is derived from the fruit of the Ximenia tree (*Ximenia Americana*), which is commonly found in Southern Africa, particularly in Namibia. Ximenia oil holds considerable significance due to its health benefits. It has been utilised in traditional medicine for its anti-inflammatory and moisturising properties. In modern applications, it has gained recognition as a valuable ingredient in skincare products and cosmetics due to its capacity to nourish and protect the skin. Ximenia has a unique blend of fatty acids that absorb quickly into the skin and leave a velvety, matte finish. Meanwhile, antioxidants are known for their ability to neutralize damaging free radicals (like UV rays and pollution) and guard your skin against damage. Source: [Ximenia Oil](#) | [Wabisabi Botanicals](#).

Kalahari Melon Oil: The Kalahari Melon (*Citrullus Vulgaris*) is native to the arid Kalahari region of Africa growing mostly in Namibia and Botswana. It is a fruit with a notably high water content, making it an exceptional source of hydration, particularly in dry conditions. Aside from its consumption as a food

source, Kalahari Melon oil, extracted from its seeds, is gaining prominence within the cosmetic industry. Its lightweight texture and potential to moisturise and rejuvenate the skin have led to its inclusion in skincare products. Kalahari Melon oil is a nourishing and hydrating oil, concentrated for skin cell recovery and moisture balance. It boasts a potent combination of linoleic acid and Vitamin E, which provides your skin barrier with the nutrients it needs for growth and repair at the cellular level. It contains 5 times more Vitamin E than Argan Oil and 10 times more than Marula Oil. Source: [Kalahari Melon Oil](#) | [Kiss Kiss Goodnight](#).

Manketti Oil: The Manketti tree (*Schinziophyton Rautanenii*) is one of the typical and widely distributed trees of the Southern African savannah landscape, including northern Namibia, northern Botswana, south-western Zambia and Zimbabwe. The edible oil extracted from Manketti seeds is used for cooking, food preparation and personal care products. Source: [Manketti Oil](#) | [ABS-Biotrade](#)

Thus, the seed oil has applications in modern cosmetics and personal care products due to its healing and nurturing properties.

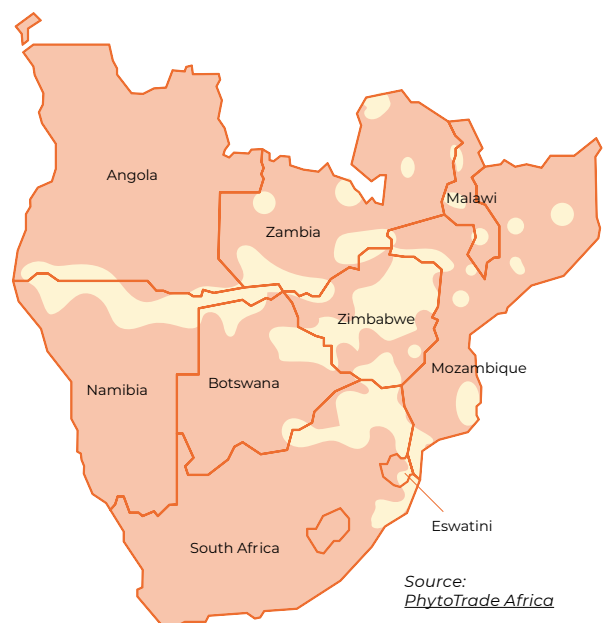
These oils transcend their primary definitions, finding applications in various industries, most notably cosmetics, skincare and even certain health and wellness sectors.

As we progress, we will delve into specific details regarding the applications and benefits of these exceptional products, highlighting their contributions across different sectors. The guide provides a comprehensive overview of various aspects as it relates to the export of fatty oils to Europe.

PRODUCT DEFINITION AND USE

In this section, we explore a thorough comprehension of Marula products, including their precise definitions and the wide range of ways they are utilised across different industries.

Marula, as described in this export guide, encompasses the fruit of the marula tree (*Sclerocarya Birrea*), a species indigenous to the Southern regions of Africa. The rich nutritional value of marula fruit is well-documented, and its utility extends to the extraction of marula oil, which possesses an array of cosmetic and medicinal properties. The hydrating and anti-aging virtues of marula oil, derived from the seeds of the marula fruit, are highly regarded, rendering it a coveted component in the formulation of skincare and haircare products. Marula, a valuable natural resource in Southern Africa, holds significant ecological, economic, and social importance. Its widespread distribution across a diverse landscape means it interacts with a multitude of cultures, perceptions, and belief systems. This perennial and drought-resistant tree, belonging to the Anacardiaceae family, thrives in frost-free regions of sub-equatorial Africa, consistently yielding bountiful crops. Typically found at medium-low altitudes in open woodlands and bush, Marula trees can grow up to 10 metres tall and live for up to 150 years. Recognizing its potential as a commercial crop is crucial for future climate change mitigation efforts.



Distribution of Marula in Southern Africa

The Marula value chain presents opportunities for rural development, job creation and the exploration of new export markets, with additional advantages encompassing technological advancements, innovation, small business growth and skills development. Ultimately, Marula contributes to the social well-being, environmental sustainability, and financial prosperity in the region. Source: [Accessing international markets for Marula fruit & oil | UNCTAD](#)

There are other plant species that also have been commercialized over the years. Their oils, owing to their unique properties, have found their way into a range of industries, particularly cosmetics, skincare and even certain health and wellness applications.

Table 1: Classification of Indigenous Southern African Fatty Oils

Common Name	International Nomenclature of Cosmetic Ingredients (INCI) name	Chemical Abstract Services (CAS) number	Distribution	Primary fatty acid profile
Marula seed oil	Sclerocarya Birrea seed oil	68956-68-3	Marula occurs throughout most of sub-Saharan Africa outside the humid forest zone, in countries such as Namibia, Botswana, Zambia and Zimbabwe.	Omega 9 (Oleic acid)
Kalahari Melon seed oil	Citrullus Lanatus seed oil	90244-99-8	Originates from western Kalahari region of Namibia and Botswana, planted throughout much of sub-Saharan Africa	Omega 6 (Linoleic acid)
Mongongo/ Manketti oil	Schinziophyton Rautanenii kernel oil	95193-67-2	Grows from southern Democratic Republic of Congo, southern Tanzania and Angola south to Namibia, Botswana and northern South Africa	Omega 6 (Linoleic acid)
Ximenia oil	Ximenia Americana seed oil	95193-67-2	Ximenia oil is naturalised in southern Africa, growing in semi-desert, open country at low altitudes	Omega 9 (Oleic acid)

Source: [Exporting Southern African vegetable oils for cosmetics to Europe | CBI](#)



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EXPORT REQUIREMENTS: LEGAL AND NON-LEGAL

Within this segment, we look at legal and non-legal criteria that need to be considered. This list is not absolute; however, it provides an overview of the key areas for consideration.

LEGAL REQUIREMENTS

Exporting Marula oil to Europe requires compliance with various legal requirements to ensure product safety and market access. These requirements are in place to protect consumer health, promote fair trade and maintain environmental sustainability. Here are some of the key legal requirements for exporting Marula oil to Europe, along with relevant sources.

Novel Food

The first consideration is whether or not the fatty oil is a Novel food. Novel Food is defined as food that had not been consumed to a significant degree by humans in the EU before 15 May 1997, when the first regulation on novel food came into force. Novel Food can be newly developed, innovative food, food produced using new technologies and production processes, as well as food which is or has been traditionally eaten outside of the EU. The underlying principles underpinning Novel Food in the European Union are that Novel Foods must be:

- Safe for consumers
- Properly labelled, so as not to mislead consumers
- If novel food is intended to replace another food, it must not differ in a way that the consumption of the Novel Food would be nutritionally disadvantageous for the consumer.

Pre-market authorisation of Novel Foods on the basis of an evaluation in line with the above principles is necessary. Marula is considered a Novel Food and although it has a very strong history of safe use, this needs to be formally documented for international regulators. Source: [Novel Food | European Commission](#).

EU Cosmetic Regulation (EC) No. 1223/2009:

Marula oil and other Marula-derived ingredients used in cosmetics in Europe must adhere to the EU Cosmetic Regulation, which sets out safety and labelling requirements for cosmetics sold in the European Union. This regulation enforces strict labelling requirements, compelling manufacturers to provide transparent and detailed information on product labels, including the ingredients used. By adhering to these regulatory standards, Marula oil-based cosmetic products not only gains the vast European market but also the trust of consumers who prioritize safety and transparency in their skincare choices. Source: [Cosmetics | European Commission](#) and [EU Cosmetic Regulation \(EC\) No. 1223/2009 | EUR-Lex](#).

Food Safety Standards

Marula oil is considered a food product in some cases and should therefore comply with European food safety regulations - including labelling, packaging, and hygiene standards. By complying with these comprehensive food safety regulations, Marula oil not only gains access to the European food market but also assures consumers of its quality, safety, and suitability for culinary purposes, reinforcing its versatility as a premium and trusted product. Source: [European Food Safety Authority \(EFSA\)](#).

Customs Documentation

Proper customs documentation - including invoices, certificates of origin and compliance with tariff codes, is required for export to Europe. In this context, comprehensive and accurately prepared invoices are of paramount importance, as they provide a detailed

account of the goods being exported, their value and the terms of the sale. Certificates of origin play a critical role in establishing the provenance of the products, which is essential for compliance with trade agreements and customs regulations. Accurate classification under the appropriate tariff codes is crucial, as it determines the applicable duties and taxes, making it imperative to correctly categorise the exported items Source: [Taxation and Customs Union | European Commission](#)

Labelling and Packaging

Exporters should ensure that the labelling and packaging of Marula oil meet EU regulations, including correct ingredient lists, allergen declarations and language requirements. Packaging must not only be practical and functional but also adhere to specific size and material requirements stipulated by EU authorities. The labelling of Marula oil products must include comprehensive ingredient lists, highlighting the presence of Marula oil and any potential allergens, as well as meet language requirements to ensure that consumers have access to all necessary information in a clear and understandable manner.

Adhering to these regulations is not only a legal necessity but also a means to build consumer trust by demonstrating a commitment to transparency and product safety. Source: [Labelling and Packaging | European Commission](#)

Environmental Regulations

In cases where Marula oil production has the potential to impact the environment, strict adherence to EU environmental regulations is imperative, particularly if the production activities encroach upon protected areas or pose risks to endangered species.

Compliance with these regulations involves thorough assessments of environmental impacts, implementation of mitigation measures, and obtaining the necessary permits or approvals, thereby ensuring that Marula oil production aligns with the EU's stringent environmental conservation standards and fosters sustainability in its practices. Source: [European Parliament](#)

Access and Benefit-Sharing

Access and Benefit-Sharing (ABS) refers to the international and national regulation of access to and use of genetic resources and traditional knowledge associated with genetic resources, and the sharing of benefits stemming from this use between providers and users.

Permission is required from the country where the genetic resource is obtained, and benefits from the use of such resources may need to be shared.

The [Nagoya Protocol](#) is aimed at providing a transparent legal framework for ABS and entered into force on 12 October 2014. It is implemented in the European Union through the [EU ABS Regulation](#) (Regulation (EU) 511/2014), which entered into force on the same date. On 27 August 2016, a Guidance document was published by the European Commission on the scope of application and the core obligations of Regulation (EU) 511/2014. On 12 January 2021, a revised Guidance document was published by the European Commission, providing more detailed information and practical examples on the scope of application and the core user obligations of Regulation (EU) 511/2014. Source: [Access Benefit Sharing | ABS Focal Point](#).

TIPS

In Namibia, the entity overseeing Access and Benefit-Sharing of fatty oils is:

Ministry of Environment, Forestry and Tourism

ABS Office

Telephone: +264 61 284 2076/2706

Email: absnamibia@mef.gov.na or

absnamibia@gmail.com



TIPS

In Namibia, the entities overseeing Marula certifications are as follows:

- The [Ministry of Agriculture, Water and Land Reform](#) issues the Phytosanitary and Veterinary Certificates.
- [Ministry of Environment, Forestry and Tourism](#) issues the Hygiene Certificate and the Access Benefit Sharing (ABS) Permit.
- The [Ministry of Industrialization and Trade](#) issues the Imported Food Importer Certificate.
- The [Namibia Chamber of Commerce and Industry \(NCCI\)](#) issues the Certificate of Origin.

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NON-LEGAL REQUIREMENTS

Marula products in Europe are valued not only for their exceptional qualities but also for the commitment to ethical and sustainable practices within the value chain. European consumers often prefer products that adhere to various non-legal standards and certifications.

Organic Certification

Numerous Marula-based products in Europe require organic certifications, ensuring that the fruit is grown and processed without the use of synthetic pesticides or fertilisers. This certification promotes environmentally friendly agricultural practices while delivering high-quality, chemical-free products. In order to obtain the green EU logo and the mention “organic”, products must be certified by a certification body approved by the competent authorities like Ecocert to attest their compliance to the EU organic regulation. The organic agriculture Europe certification applies for agricultural raw materials and food products alike. Source: [Organic Agriculture Europe Certification | Ecocert](#)

Certification For Natural and Organic Cosmetics

Consumers increasingly seek naturally derived products, which led to the development of the [COSMOS](#) standard as well as the [NaTrue standard](#). Both define the criteria that companies must meet to ensure consumers that their products are genuine organic or natural cosmetics produced to the highest feasible sustainability practices. While [COSMOS](#) was initiated by the five main European standards organisations, [NaTrue](#) was founded by European manufacturers of natural and organic ingredients and finished cosmetics. NaTrue focused more on natural and the final product, however, the two are equally acknowledged on the European market.

Certification For Fair Trade

Some Marula-based products available in Europe such as [Drunk Elephant](#) carry the [Fairtrade](#), the [Fair for Life](#) certification, or [FairWild](#) in the context of wild collection, which guarantees fair wages and ethical treatment for workers involved in the production process. This certification supports social responsibility and fair trade principles, aligning with European consumers' values. Source: [Fair for Life Certification](#)

Corporate Social Responsibility

One way to assess and certify corporate social responsibility is through SMETA. It is the world's most widely used audit. Businesses use SMETA to understand and make improvements to working conditions and environmental performance in their business and supply chain. It is an audit, which helps to understand standards of labour, health and safety, environmental performance, and ethics within your own operations or at a supplier site. It is delivered by one of SMETA's [approved auditor companies](#), you or your supplier are provided with a Corrective Action Plan to help improve performance in these areas. The audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced labour. Source: [SMETA](#).

Quality and Safety Testing

Comprehensive quality and safety testing, as mandated by EU regulations, is a fundamental step in verifying that Marula oil adheres to the prescribed standards for purity and safety, providing consumers with confidence in its quality and suitability for various applications. Rigorous testing processes encompass factors such as chemical composition, microbial contamination, and potential allergens, ensuring that Marula oil complies with EU requirements and aligns with the highest safety and quality standards in the European market. Source: [Europe Food Safety Testing Market | Market Data Forecast](#)

By choosing Marula products with these certifications and adhering to these quality standards, European consumers can enjoy high-quality, ethically sourced, and safe products while supporting sustainable and fair practices in the Marula industry.

DEMAND: TRENDS AND STATISTICS

The demand for Marula oil in Europe is experiencing notable growth across various aspects. Market size is steadily expanding, particularly within the cosmetics and skincare sectors, as consumers increasingly value the oil's benefits. Geographic demand is on the rise, with Western European countries showing heightened interest in this versatile product. Organic Marula oil is gaining preference, aligning with Europe's increasing attraction towards organic and natural cosmetics.

Ethical considerations are also impacting the market, with growing consumer interest in products sourced through fair trade practices. Health and wellness awareness continue to drive demand, as Marula oil is recognized for its skincare benefits.

Furthermore, its applications extend beyond cosmetics to encompass pharmaceuticals and the food industry. Finally, sustainability remains a key focus, with European consumers favouring products sourced in an environmentally responsible manner, aligning with the broader trend towards eco-conscious choices in the region.

EMERGING TRENDS

Emerging trends for Marula oil in Europe reflect a growing awareness of its benefits, sustainability, and versatility. Below are some of these emerging trends:

Natural and Organic Cosmetics

There is a rising preference for natural and organic cosmetics in Europe, leading to increased demand for Marula oil as an ingredient. Consumers are seeking products with minimal synthetic additives and are looking for organic certifications.

TIPS

- Work out a marketing story for your fatty oil. What sets your oil or your company apart from competitors? For example, can you link it to a traditional use in cosmetics? Is it used in local beauty practices? What benefits do you provide to local communities?
- Do you also offer other ingredients in addition to fatty oils that cosmetic brands could use to develop a range of products based on the Southern Africa origin?
- Provide your buyers with good-quality pictures or videos to support your marketing story; for example, pictures of the origin of your oil and traditional or local production processes.
- If you make an ethical claim for your fatty oil, support this claim with evidence. Which benefits does your product offer to local communities, how many communities are you helping? Provide your buyers with specific information and figures about your impact.

Sustainable Sourcing

European consumers are becoming more environmentally conscious, and this trend extends to the sourcing of Marula oil. Companies are increasingly emphasising sustainable and ethical sourcing practices, including fair trade and supporting local communities. In response to this demand, enhancing traceability throughout the supply chain is becoming a crucial factor in assuring consumers of the oil's origins and ethical production.

Anti-Aging and Skincare

The anti-aging properties of Marula oil are gaining recognition in the European skincare market. It is being used in a wide range of anti-aging and moisturising products, catering to the demands of an ageing population.

Expanding Product Range

Manufacturers are diversifying their product range to include Marula oil in various forms, such as serums, creams and hair care products. This diversification is driven by increasing consumer interest and demand.

Health and Wellness

Marula oil is not only used in cosmetics but also for its potential health benefits. There is emerging interest in the culinary use of Marula oil for its nutritional value. These emerging trends in Europe reflect a growing appreciation for Marula oil's versatility, ethical sourcing, and health benefits, making it a sought-after ingredient in various industries.

STATISTICS

As per the classification provided by the International Trade Centre (ITC), Marula oil is categorised under the HS code 151590, which encompasses fixed vegetable fats, oils, and their fractions.

The [Export Potential Map](#) serves to provide an overview of the export dynamics of 1515XX Fixed vegetable fats, oils & fractions, not chemically modified, n.e.s. from South Africa and Namibia to Europe, highlighting the significance of Marula oil within this broader category. It should be noted that no verifiable statistics could be attained on the volume of marula exports from Namibia to Europe at the time of publishing this guide.

TIPS

- Focus on nations that demonstrate significant or increasing imports of specialty oils from developing regions.
- Engage with importers to gauge their potential interest in direct imports from developing countries. This approach could be a viable strategy, especially for specialty oils traded in substantial quantities.
- Conduct additional market research for more insight into the differences between the countries mentioned above. Use free statistical databases such as [ITC Trademap](#) or the [Access2Markets](#). Look for trends on websites such as [Cosmetics Design Europe](#).

CONCLUSION

This guide, although not absolute, provides information that can support you in your export preparations to the EU. The onus rests on you to conduct further research in order to comply with the relevant export regulations.

One issue not considered in this guide is that the cost of compliance could be quite hefty. Although the EU remains an attractive market for Fatty Oils, one needs to also consider trade within the regional and local markets.




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