

Guidelines for Responsible and Sustainable Berry Purchasing

June 2025

The Swedish Food Retailers Federation and Swedish Food Federation have drawn up common guidelines to complement the existing regulatory framework regarding the free picking of wild berries in Sweden. These *Guidelines for Responsible and Sustainable Berry Purchasing* are meant to help to clarify legal uncertainties and improve conditions for the berry pickers, and to prevent tax fraud and other criminal activity. The Guidelines also promote economic, social and ecological sustainability.

It is important to differentiate between berry pickers who work as employees in an employer-organized form and “free” berry pickers. A company that has pickers as employees must follow existing labour market laws. There is also a specific collective agreement through which the Swedish Food Federation serves as the union counterpart for employed wild-berry pickers.

These laws and agreement do not apply for free berry pickers. Companies that operate berry-purchasing activities cannot and must not place demands on free pickers regarding when, where and how to pick the berries – the berry pickers themselves are free to determine these aspects. This freedom comes at a cost to the berry picker. Free pickers have no guaranteed wages and are not covered by any insurance. We want to help to ensure proper conditions for people who pick berries in Swedish forests as well as ensuring that actors in the food chain place proper demands on their suppliers.

When purchasing Swedish wild berries, Swedish Food Retailers Federation member companies commit, as far as possible, to choosing only berry purchase sites that follow the Guidelines.

Berry Purchaser's Information for Berry Pickers

Purchasers at berry-purchase sites must post the following information:

1. You may sell the wild berries you have picked yourself. Income from selling wild berries that you picked yourself is tax-free up to a total of 12,500 SEK per individual per tax year. This per-individual amount applies to each member of a family. The amount applies to the individual's total income from selling berries. See also the Swedish Tax Agency's legal guidance: <https://www4.skatteverket.se/rattsligvagledning/edition/2025.1/2629.html>
2. Purchasers may only buy wild berries from private individuals. Buying

- berries from an individual representing a group of berry pickers is not permitted. Intermediaries are not permitted.
3. Check that the weight of your berries matches the weight indicated on the berry list.
 4. Check that the per-kilo price on the purchase list is the same as the per-kilo price on the berry list.
 5. Identify yourself when you sell your berries – your national ID number, passport number or international ID card number must be entered on the berry list and must be legible.
 6. You must validate/approve the transaction yourself with your name, which must be legible.

The berry purchaser must provide the following information to the berry pickers (to pickers who regularly sell berries to purchasers, e.g. in the form of a printed notice):

- Pickers have the right to sell berries to other berry purchasers.
- Selling berries to a berry purchaser means that the picker is selling a product; pickers are not employed by the berry purchaser.
- It is against the law to pressure other berry pickers regarding when, where and how they should pick berries.
- Pickers are responsible for their own food, lodgings, and transportation.
- You must not be staying in illegal lodgings in Sweden. If Sweden's right of public access applies where you are, you may stay in a tent for 1-2 days at the same site, with a maximum of 2-3 tents per site. Consideration and care must always be taken regarding nature and the landowner, however, and special rules apply in nature reserves and national parks. See Swedish Environmental Protection Agency information regarding Sweden's right of public access: <https://www.naturvardsverket.se/4ac2eb/globalassets/media/publikationer-pdf/8500/978-91-620-8522-3.pdf>
- Most non-EU nationals require a visa to stay in Sweden.

Order and hand out the *Picking Berries in Sweden* pamphlet (ISBN 978-91-620-8532-2) from the Swedish Environmental Protection Agency. The pamphlet is available in 8 languages. See the Swedish Environmental Protection Agency website: <https://www.naturvardsverket.se/4ac2b5/globalassets/media/publikationer-pdf/8500/978-91-620-8532-2.pdf>

Berry Purchaser's Intentions and Responsibility

The berry purchaser's intention must be to:

- use identifiable packaging that shows the company name (of the berry purchaser or wholesaler to whom the berries are being sold). This facilitates identification of the berries' origin as well as reducing the risk of packaging materials being stolen.

The berry purchaser must NOT, directly or indirectly via contact with intermediaries:

- have participated in the recruiting of berry pickers,
- receive payment from the berry pickers for allowing them to pick wild berries,
- control when, where or how the berry pickers pick wild berries,
- allow a camp or lodging facility to be linked to a berry purchase site (where pickers are forced to sell their berries to a specific berry purchaser),
- pressure other berry purchasers to shut down or relocate their operations.

The berry purchaser must:

- be able to show that it is a registered company, have one or more identified sites where its berry purchasing operations take place.
- hold a valid certificate of registration from the Swedish Companies Registration Office issued for the current purchasing year. The certificate must also indicate whether the purchasing company pays F- or FA taxes and is registered for VAT.
- If cash amounts exceeding the equivalent of 5000 EUR are handled, berry purchasers must have anti-money laundering procedures in place. Ref: *Swedish Act on Measures against Money Laundering and Terrorist Financing (2017:630)*. See further information regarding anti-money laundering measures on the FI website (Sweden's monitoring authority for the financial market): <https://www.fi.se/sv/bank/penningtvatt/process/>
- The berry purchaser must also be registered in the Swedish Companies Registration Office's anti-money laundering registry: <https://bolagsverket.se/omoss/flerverksamheter/registretmotpennningtvatt.2557.html>
- The berry purchaser must register as a primary producer with the County Administrative Board. Ref: <https://www.livsmedelsverket.se/foretagande-regler-kontroll/regler-for-livsmedelsforetag/primarproduktion>

The berry purchaser must itself:

- declare that it complies with the guidelines listed above.

Recommendations for Berry Purchasers

It is recommended that berry purchasers:

- cooperate with the municipality, medical care and social authorities if berry pickers become ill, experience an emergency, or are living and residing in squalor, as well as if they have concerns

- regarding children accompanying the pickers.
- cooperate with the police in the case of suspected criminal activity in connection with the berry picking (such as illegal lodgings, human trafficking, and human exploitation).
 - successively introduce payment to pickers via digital means; a first step should be to offer pickers the option of being paid digitally.
 - inform pickers about food safety and quality in the handling of fresh wild berries.
 - inform pickers about hunting and hunting seasons in Sweden that fall within the berry-picking season. For the pickers' own safety and out of consideration for the hunters, pickers must not disrupt an ongoing hunt.

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