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Global Agricultural Information Network

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Food and Agricultural Import Regulations and Standards - Narrative

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Report Highlights:

The Food and Agricultural Import Regulations and Standards (FAIRS) report provides an overview of the food laws and regulatory environment in Egypt as it relates to U.S. food and agricultural exports. Current status regarding food control systems remains multi-sectorial with the three basic characteristics of food control in place: food laws, accompanying regulations and ministerial decrees; food inspection services; and laboratories for technical support. . The newly elected Egyptian parliament is likely to discuss a new food safety law that will lead to the establishment of a Food Safety Authority, streamlining Egypt's diffuse food safety system.

Disclaimer

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural service in Cairo, Egypt for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, it is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers prior to shipping. Foreign importers are normally best equipped to research import requirements with local authorities. FINAL IMPORT APPROVAL OF ANY PRODUCT IS SUBJECT TO THE IMPORTING COUNTRY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY.

Section I General Food Laws

Overview

There are more than 120 food related regulations in the form of legislation, presidential or ministerial decrees and circulars, all of which have the force of law. Many of those regulations create difficulties in ensuring a streamlined food regulatory system attuned to international standards and guidelines. To address this problem, in 2005, Egypt published Ministerial Decree 770/ 2005, "Executive Regulation to Implement Import and Export Law 118/1975," as well as the "Inspection and Control Procedures of Imported and Exported Goods." The decrees reduced the list of imports requiring inspection for quality control to 101 classes from 5,700 and allowed for some importers to supply their own certificates of conformity from internationally accredited laboratories inside or outside Egypt.

Under Decree 770/2005, the process of inspection and certification of food imports is centralized under the General Organization for Export and Import Control (GOEIC) of the Ministry of Trade and Industry (MTI). Additionally, GOEIC became the sole authority responsible for processing customs documents, as well as issuing the final results of inspections through a certificate of conformity. To accomplish this, GOEIC works closely with the Ministry of Agriculture and Land Reclamation (MALR) and the Ministry of Health (MOH), as these ministries have statutory authority for the inspection and testing of imported food products.

The Ministry of Health, in addition to inspecting food imports with GOEIC at port, is responsible for collecting food samples and testing these at its central public health labs for chemical, toxicological, and microbiological analysis.

The Ministry of Agriculture and Land Reclamation's Regional Center for Food and Feed (RCFF) is responsible for monitoring imported and domestic feed and feed ingredients. The General Organization for Veterinary Services (GOVS) of MALR is responsible for protecting livestock and human health from exotic and epizootic diseases, veterinary drug residues, and contaminants. GOVS also drafts and enforces regulations concerning imports of animals and animal products. The Central Administration of Plant Quarantine (CAPQ) of MALR is the leading body for the protection of plant health, and is responsible for drafting and enforcing import regulations of plant and plant products. These agencies must all coordinate with the Egyptian Customs Authority (ECA) and the General Organization for Import and Export Control (GOIEC).

It is to be noted, that Decree 770/2005 also allowed for the creation of modern customs centers at the major ports, operating with state-of-the-art information technology systems. Known as data warehouses,

these systems facilitate communication between customs, inspection agencies, port authorities, shipping lines, and freight forwarders.

According to the World Bank's "Doing Business 2015" study, going through customs procedures (from berthing at the port to final destination delivery) takes an estimated 15 days, three days longer than the previous year. This compares with an average of 20 days for the Middle East and North Africa Region and 11 days for the OECD. In 2015, the World Bank ranked Egypt 99 out of 189 countries for trading across borders, down from 81 out of 189 countries from the 2014 study.

Major Laws or Decrees Impacting Food Imports

- Ministerial Decree 770/2005 Concerning the Executive Regulation To Implement Import and Export Law no.118/1975 as well as Inspection and Control Procedures of Imported And Exported Goods
- Prime Ministerial Decree 1186/2003 Inspection and Control Measures of Exports and Imports
- Law 82/2002 The Protection of Intellectual Property Rights
- Law 121/1982 The Registration of Importers
- Presidential Decree 106/2000 Facilitating Inspection and Control Procedures of Exported and Imported Goods
- Law 118/1975 Import and Export

For a complete list see Appendix II.

Major trade barriers to U.S Exports include:

- On February 7, 2015, the Egyptian Organization for Standardization (EOS) at the Ministry of Trade and Industry amended the standards for meat and variety meats. The new amendment eliminates maximum residue level (MRLs) for naturally-occurring hormones in foodstuffs of animal origins but continues to establish a zero tolerance level for the use of synthetic hormones. Imports of frozen beef and varieties from all origins are now subject to lab testing against synthetic hormones. If synthetic hormones are detected, the shipment will be rejected and the importer has to re-export the shipment to another destination or back to the supplier. A zero tolerance level for the use of synthetic hormones is not in line with international standards. Codex Alimentarius has developed science-based MRLs for veterinary drugs, including hormones that ensure the wholesomeness of beef and beef products.
- Due to concerns with Bovine Spongiform Encephalopathy (BSE), Egypt also requires that beef must come from cattle that are less than 48 months old for deboned meat, and less than 30 months of age for bone-in meat. These standards are not in line with the World Organization for Animal Health (OIE) guidelines.
- Live cattle, calves for slaughtering and calves for fattening are subject to a 21-day pre-shipment quarantine and 28-day quarantine on arrival. In addition, there is a compulsory inspection by General Organization for Veterinary Services (GOVS) for each consignment, covering the entire pre-shipment quarantine period in the country of origin.
- MALR, Ministerial Decree 448/2012 banned the import of heat-treated feather meal. Egypt cites avian influenza (AI) contamination and nutritional value concerns as a justification for the ban.

Although Egypt has notified the WTO, its notification omits references to it having similar concerns with its own domestic feather meal production. This ban contradicts OIE findings and is inconsistent with Egypt's WTO obligations.

- Based on the Ministerial Decree 426/2009 issued by MALR concerning the freedom of the cereal consignments from *Ambrosia artemisiifolia*. The Central Administration for Plant Quarantine (CAPQ) of MALR required that wheat, soybean and corn imports be free from Ambrosia weed seeds. If ambrosia seeds are detected by the CAPQ inspector, the importer is required to sieve the shipment under the supervision of the CAPQ. Egypt's specification limits the number of weed seeds to 25 seeds per kilogram as the maximum tolerance levels of noxious weed seeds.
- Egypt is one of world's largest seed potato importers, but it does not import varieties of U.S. seed potatoes due to phytosanitary concerns regarding *Ralstonia* (brown rot) and ring rot. The U.S. seed certification process, however, ensures that seed potatoes are free from the aforementioned viruses as well as other diseases. Egypt has conducted a pest risk assessment and two field inspection visits to the United States, and is in a position to sign an import protocol for U.S. seed potatoes. Despite the risk assessment, Egypt has not agreed to an import protocol for all U.S. seed potato origins, stating that it needs to conduct state by state inspections, contravening international standards.
- Egypt bans U.S. poultry parts on unfounded halal concerns, this exclusion of poultry parts and offal is contrary to Egypt's WTO commitments.

Section II: Food Additive Regulations

On May 31st 2015, the Minister of Health issued Decree 204/2015 regarding food additives that are accepted for use by the food industry. Food colors that are allowed in food products according to the new decree are listed in the following table:

Food colors:

Riboflavin 5-Phosphate,sodium	Allura Red AC	Caramel I : Plain caramel	beta-Carotenes, vegetables	Carotenoid acid, ethyl ester, beta-apo-8
Riboflavin 5-phosphate	Indigotine (Indigo Carmine)	Caramel II: Sulphite caramel II	beta-Carotenes, Blakestea trisporn	Lutein: xanthophylls
Riboflavin from <i>Bacillus subtilis</i>	Brilliant blue FCF	Caramel III: Ammonia caramel	Annato extracts, bixin –based	Canthaxanthin
Tartrazine	Chlorophylls, copper complexes	Caramel IV: Sulfite Ammonia Caramel	Paprika extracts (Paprika,Paprika Oleoresins)	Beet root (beet red)
Quinoline yellow	Carmoisine: Azorubine	Brilliant black PN	Lycopene; (gamma carotene)	Anthocyanins

Sunset yellow	Chlorophyllin, copper complexes, potassium and sodium salts	Brown HT: chocolate brown HT	Lycopene: Blakestea trisporn	Grape skin extract
Carmines	Copper complexes of chlorophylls and Chlorophyllins	Beta-Carotenes, synthetic	Carotenal, beta-apo-8	Calcium Carbonate
Titanium dioxide	Iron oxide, red	Iron oxide, black	Iron oxide, yellow	

Ministerial Decree 204/2015 issued by MOH lists all concentrations levels of acceptable food colors. Exporters should check with MOH to verify the acceptability of any food coloring since food colors are always reviewed and updated according to Codex Alimentarius standards.

There are no exceptions to the regulations governing food colorings. The scientific name of the color ingredient and the percentage of concentration must be indicated on the Analysis Certificate. Egyptian authorities will not allow a product to be imported if it contains an unauthorized color, even if the use of the color is acceptable in another country.

MOH issued Decree number 73/2001, which mandated that colors used on the inner and outer package should not be harmful to human health and should be fixed. If the color could be easily altered, its use is not permitted.

B. Preservatives

All preservatives must be identified along with the allowed concentration expressed as a percentage in parts per million calculated on the acid base. Ministerial Decree 204/2015 issued by MOH lists all acceptable preservatives and concentrations levels.

C. Flavorings

MOH does not maintain a list of approved flavorings; however, all flavorings accepted under Codex Alimentarius also are approved for use in Egypt. Ministerial Decree 204/2015, issued by MOH, lists the concentration levels of all acceptable flavorings.

For more information on Food Additives U.S. exporters can contact:

Ministry of Health (MOH)

Dr Ahmed Safwat – Director of Central Labs, Ministry of Health

Tel: +20 (2) 2794-1507, +20 (2) 2794-0526

Fax: +20 (2) 2795-3966

Website: <http://www.mohep.gov.eg>

National Nutrition Institute (NNI)

Dr Zeinab El Sedafi – Director of the National Nutrition Institute

Tel: (202) 25324315- 2364-6413 / 3522

Fax: (202) 2364-7476

Email: nniegypt@nni.org.eg

Website: <http://www.nni.org.eg/>

Section III: Pesticide and Other Contaminants

Pesticide Laws and Regulations:

Ministerial Decree 2188/2011 established the Agricultural Pesticide Committee (APC) which sits within the Minister for Agriculture and Land Reclamation and is the authority responsible for registering agricultural pesticides based on two major criteria: efficacy against agricultural pests, and safety to the public health and the environment.

Ministerial Decree 1018/2013 explained the role of the APC as being the only Egyptian authority accountable for the assessment, evaluation and registration of agricultural pesticides, up to the point of retail sale.

Mission of APC:

- 1- APC is responsible for tailoring, administering and managing the National Registration Scheme and decrees for agricultural pesticides. These set out the regulatory framework for the management of pesticides production, import, export, and use in Egypt.
- 2- APC administers the legislation scheme in partnership with state and territorial governments and with the active involvement of other Egyptian government agencies.
- 3- APC serves as a national focal point that cooperates with international pesticide regulatory authorities for effective use and global safety of plant protection products throughout their life cycles.

The APC is mandated by the Egyptian Agricultural Law, 53, 1966, The First Book, Part VI Plant Protection, Chapter I Agriculture Pest Control Articles 72-77, Chapter II Ag. Pesticides Articles 78-83, and Chapter III Quarantine Articles 84-89

The members of the APC are appointed by a ministerial decree. The decisions and pesticide regulatory policies are evidence-based, freely-discussed, and consensually-reached.

Pesticide Registration Process:

1. The stakeholder presents a pesticide-registration application to the APC after paying the registration fees. A preliminary file containing the required technical data of the pesticide must be submitted attached to the application.
2. A technical committee reviews the preliminary file of the pesticide and determines its registration status in the EU, USA, Canada, Australia, and Japan.
3. After the approval of the preliminary file, the stakeholder presents a preliminary program containing all the required data for a suggested efficacy testing of the pesticide against the target pest. The program is reviewed by the Committee Secretariat which in turn submits it to the APC for approval.
4. After reviewing and approving the program by both parties, the stakeholder is required to pay for lab analysis and experimentation fees. The stakeholder also presents four original copies of the experimentation program and the pesticide is ready for the first year trial program. The four originals are kept by:

- a. The experimentation officer assigned by the APC in the competent institution or laboratory.
 - b. The Pesticides Central Laboratory.
 - c. The stakeholder.
 - d. The Committee Secretariat.
5. In case of importing pesticide samples for testing, the stakeholder submits an application to the Committee Secretariat in order to release the samples free of charge for lab analysis and experimentation in accordance with the amount that will be imported.
 6. The stakeholder sends the samples to the experimentation officer assigned by the APC of the competent institution or laboratory, who must confirm that the samples are ready to be subjected for analysis and examination. The experimentation officer then sends the samples to the Pesticides Central Laboratory to analyze their physical and chemical properties.
 7. In case that the analysis of the pesticide sample does not meet the required specifications and scientific data, the stakeholder can submit a claim to the Pesticides Central Laboratory to retest the product. If the second test fails the required criteria, the analysis stops at this point.
 8. In case the analysis meets the required chemical and physical properties for analysis, the experimentation officer sends the sample to an experimental research station, which will test the product according to the experimentation program submitted by the stakeholder and approved by the APC.
 9. Under Ministerial Decree 1018/2013, the Pesticide Central Laboratory must identify the pesticide's chemical and physical properties, pass all the experimental phases, and show acceptable efficacy against the targeted pest in order to be registered.
 10. The researcher in charge of experimentation submits the testing results to the board of the competent institute for evaluation and approval. If the pesticide passes the experimental phases and meets the technical criteria, a recommendation notice is issued. The recommendation notice should be signed by the person in charge of experimentation at the competent institution, and subsequently submitted to the APC.
 11. The stakeholder completes the dossier of the pesticide pending registration and the Committee Secretariat submits the file to two experts to study and review its technical and scientific data. The experts are assigned by the committee's chairman or vice chairman. If the experts have significant differences, a third expert is selected to reach to a fair and balanced scientific judgment regarding the file approval.
 12. In case the file passes all the required phases and recommendations, the APC issues a pesticide biological evaluation certificate which confirms that the pesticide successfully passed the required phases for testing, experimentation and evaluation.

Important Dossier Contents:

- Physical/chemical properties, formulation, packaging, mammalian and ecological toxicity, and label requirements.
- Field trial information, laboratory analysis (methods & results), efficacy data.
- Health risk assessment, emergency procedures, and recommended use.

13. The APC issues its approval to register the pesticide after the registration file, the pesticide dossier, and the recommendations of the experts are discussed by the APC.
14. Three copies of a registration certificate are issued, one for the APC secretariat, one for the Pesticides Central Laboratory and another copy for the stakeholder.
15. The registration certificate is valid for six years from the date of issue. Registering the efficacy of the pesticide is required before the first three years of the validity of the registration certificate lapses.
16. After the registration certificate is issued, the stakeholder has to submit an application to for a pesticide identification card, which must be renewed every two years.
17. Importation of pesticides must be done by an individual certified to trade in pesticides, and the pesticide in question must be registered and its registration is valid.

Adherence to International Undertakings with Direct Implications for Pesticides

According to Article 28 of the Ministerial Decree 1018/2013, maximum residue limits (MRL) of the Codex Alimentarius, the EU, or values set by U.S. Environment Protection Agency (EPA) shall apply to the agricultural crops and products in the corresponding order. In the absence of MRLs for a certain crop or product, MRLs of the closest crops or products shall be applied in corresponding order. APC is working closely with other government regulatory agencies around the world (i.e. the U.S. EPA, the EU) to keep pace by using and contributing to the development of the most up-to-date risk assessment tools and methods.

The Central Public Health Labs of MOH and The Central Laboratory for Pesticides and the Central Laboratory of Residue Analysis of Pesticides and Heavy Metals in Food of MALR are responsible for examining and testing for pesticide MRLs of fresh fruit and produce, ensuring that MRLs do not exceed limits.

For more information on pesticide import requirements and registration, as well as information on approved pesticides and allowed MRLs, U.S exporters can contact:

Ministry of Agriculture and Land Reclamation (MALR)

The Agriculture Pesticide Committee (APC)

Contact: Prof Mohamed Abdel Meguid Chairman of APC

Tel: +2 (02) 37480576

Email: Chairman@apc.gov.eg

Website: <http://www.apc.gov.eg/en/default.aspx>

Contaminants

Aflatoxins:

For Aflatoxins, Egypt follows the European Union maximum limits for total Aflatoxins and Aflatoxin B1, which are set in the European Commission Regulation 1881/2006, "Setting Maximum Levels for Certain Contaminants in Foodstuffs."

The maximum allowable total aflatoxin levels and B1 levels for the required products are listed in this table:

Food item	ug/KG	ug/KG
	Maximum allowable Aflatoxins	Maximum allowable B1 Level
Corn	10	5
Raw Pistachio	10	8
Processed and Roasted Pistachio	12	15
Almonds	10	8
Peanuts	4	2

Dioxin Levels:

Egypt tests for dioxin levels in meat and meat products. U.S. meat exports have been found to exceed Egypt's permissible dioxin levels, especially beef livers. In early 2013, Egypt required that 100 percent of all U.S. livers had to be sampled and tested for dioxin. Prior to this only five percent were subject to sampling and testing. Egypt applies EU regulations in testing for dioxin (EU 1881/2006 and EU 1259/2011). The current MRL for beef liver is 6pg TEQ/g fat.

In April 2014, the Egyptian MOH revised its requirements based on a three-month sampling of shipments that were below the required MRL. Following this revision, dioxin testing is being applied to 25 percent of imported products. The MOH's Food Safety High Committee convenes every 3 months to revise inspection frequencies for imports from all origins.

Section IV: Packaging and Container Regulations

According to Ministerial Decree 73/2001 for packaging materials, issued by MOH, Egypt has no special packaging or container size requirements, regulations, or preferences. There are no restrictions or limitations on the use of any packaging materials like PVC.

Articles pertaining to solid waste management in Law 4/1994 do not have any significant impact on imported food products.

Section V: Labeling Requirements

A- General Requirements

Labelling guidelines are found under Egyptian standard 1546/2011 and are applicable to all imports of food products. In addition to the foreign language, all information must also be written in Arabic. Any contradiction between the English and Arabic dates may lead to product rejection. Labels can be printed on the package or be of a permanent adhesive type. Products cannot show more than one date of manufacture or expiration on the package. For example, goods have been rejected if the inside package has a different date than the outside carton. Information on the label cannot be erased, scratched, or altered in any way. Requirements are more restrictive for meat and poultry products.

All labels must include the following information:

- a) Name and address of manufacturer
- b) Brand or trademark, if appropriate
- c) Country of origin
- d) Type of product and grade
- e) Name and address of importer

- f) Production and expiration dates. (These dates may be mentioned separately on the top of the package. They can be applied by laser, imposed, or printed. In such cases, there is no need to repeat them on the label.)
- g) Product ingredients.
- h) Storage instructions or temperature for all Products - Storage temperature must be placed with the refrigeration statement on the boxes to fully clarify the type of product being handled. (Examples: "KEEP FROZEN - STORE AT OR BELOW ____degrees C.; KEEP CHILLED (OR REFRIGERATE) - STORE BETWEEN ____degrees C. and ____degrees C.")
- i) Net weight
- j) Gross weight and total number of the packages per case or carton
- k) If the product contains preservatives, the percentage of each preservative should be indicated
- l) If the product is meat or poultry, the following statement must appear: "slaughtered according to the Islamic ritual" or "Halal slaughtered"

The following items are exempted from labeling:

- A) Small items whose greater surface is 10 cm square or less.
- B) Milk and beverage packs whose quantity is 200 milliliters or less.
- C) Wrapped dried sweets (candy, jelly candy, toffee and fun size chocolates sold by weight, not by bar as these are considered unpacked products.

Requirements for Frozen Beef

In Feb 2006, the Minister of Trade and Industry issued Decree 120/2006 stating that products for frozen beef must be packed in sealed bags according to sanitary standards. A printed label must be inserted inside the poly bag with the following information in Arabic language:

- a) Country of origin
- b) Producer's name
- c) Name of the slaughterhouse
- d) Date of slaughter
- e) Importer's name and address
- f) Name of the entity that supervised the slaughtering process according to Islamic rules.
- g) Type of meat and percentage of fat content. (Fat content of red meat for processing must be no more than 20 percent.)

1. Percentage fat content is only required on the carton label and may be added by the importer after arrival in Egypt, but before release by Egyptian authorities.
2. Percentage fat content labeling is not required for offal.

The entity that supervised the slaughtering process according to Islamic rules must be approved by the Commercial Office of the Egyptian Embassy (or Consulate) in the country of origin. Imported products no longer have to be packed in labeled plastic bags. The new guidelines now only require that a label be inserted into clear plastic bags. The inserted label should include country of origin, date of production, and expiration date. Labels can be printed on the package or be of a permanent adhesive type. Products cannot show more than one date of manufacture or expiration on the package.

Halal Labeling

Halal certified products must be labeled with a statement indicating that the product has been slaughtered in accordance to Islamic principles. The exporter must obtain a Halal certificate or “Certificate of Islamic Slaughter” from a member of an Islamic center or Islamic organization, certifying that the animals were slaughtered according to Islamic religious requirements. This certificate must accompany all shipments of products labeled "Halal." The certificate must be endorsed by the Arabian-American Chamber of Commerce or by an Egyptian Consulate.

Expiration Period:

The Minister of Trade and Industry issued Decree 859/2012 adding a new article to “Ministerial Decree No. 770/ 2005 Concerning the Executive Regulation to Implement Import and Export Law No.118/1975 as well as Inspection and Control Procedures of Imported and Exported Goods.”

The new article states that in order to release food commodities, with the exception of grains and oilseeds, the expiration period left for human consumption starts from the day the shipment arrives to Egyptian ports or when Customs issues the clearance certificate.

The product must arrive at the port of entry with the following shelf life or otherwise the consignment will be rejected:

- a) Products with shelf life of six months or more must arrive at Egyptian ports with at least three months of remaining shelf life.
- b) Products with shelf life of more than three months but less than six months must arrive at Egyptian ports with at least one month of remaining shelf life.
- c) Products with shelf life of more than sixteen days to three months shelf life must arrive at Egyptian ports with at least one week of remaining shelf live.
- d) Products with at least fifteen days shelf life must arrive at Egyptian ports with at least three days of remaining shelf life.

The expiration period for frozen beef livers, kidneys, and hearts is seven months from the date of production. The expiration period for frozen boneless beef is twelve months from the date of production. The expiration date for whole frozen poultry, leg quarters, drumsticks, and thighs is 12 months from the date of production.

B- Requirements for Other Specific Labeling Requirements

Egypt is a net importer of agricultural commodities including soybeans for food and feed and yellow corn for feed. The government maintains a general import policy of allowing imports of agricultural commodities as long as the imported product is approved and consumed in the countries of origin. Except for seeds for planting, U.S. GMO products are allowed to enter Egypt without restrictions.

Egyptian law does not require labeling of biotech crops or products with biotech content. In addition, there is no approval needed for importing biotech products.

On December 16th 2014, the Minister of Agriculture issued Ministerial Decree 1495/2014 in order to reestablish the Egyptian National Biosafety Committee (NBC). To date, the NBC has not held a meeting since its reestablishment.

Section VI: Other Specific Standards

Import regulations require that every component of a product be inspected – regardless of the compliance history of the product, country of origin, exporter, shipper or the importer. No import can be put up for direct sale without first proving that it conforms to established Egyptian standards. If no domestic standard exists, then it must be defined using the standards of one of its affiliated international organizations (such as ISO, IEC and Codex Alimentarius).

Egyptian standardization commenced in 1957 with the formation of the Egyptian Organization for Standards (EOS), which is affiliated with MTI. Since its inception, EOS has established approximately 8,500 standards, of which 543 are Egyptian technical regulations or mandatory standards.

Nearly 80 percent of its mandatory standards are based on standards issued by international organizations. In the absence of an Egyptian standard, Ministerial Decree 180/1996 allows importers to choose a relevant standard from seven international systems including: ISO, European, American, Japanese, British, German – and for food, Codex Alimentarius.

While EOS issues regulations and standards for the local market, verification of compliance is performed by other governmental bodies. GOEIC is responsible for testing imported products. Additional agencies that verify consistency with technical regulations and standards include MOH and MALR.

The Central Public Health Labs of MOH are responsible for testing the chemical and physical composition food additives and colors to ensure that they meet the required standards. The Reference Laboratory for Safety Analysis of Food of Animal Origin of MALR is responsible for monitoring that agricultural products meet the quality attributes specified by the relevant standards.

Section VII: Facility and Product Registration

A. Facility Registration:

For most U.S. products, facilities do not need to be registered with an Egyptian regulatory authority prior to export. However, for beef, the General Organization for Veterinary Services (GOVS) of MALR requires that U.S. plants that want to export to Egypt be inspected and approved. All approved slaughter facilities are subject to re-examination every three years to renew their eligibility to export to Egypt. The examinations evaluate both food safety and halal practices. This year the government decided to have representatives from the known Islamic institution “Al Azhar” to accompany the GOVS veterinarians to the audits. Beef plant audits in the United States are implemented by veterinarians from GOVS in cooperation with the U.S. Meat Export Federation (USMEF). To date, around 57 beef slaughter facilities have been audited and approved for export to Egypt.

B. Product Registration:

Special Dietary Foods

The National Nutrition Institute (NNI) and MOH’s Drug Planning and Policy Center are responsible for the registration and approval of all nutritional supplements and dietary foods. Special dietary foods are foods whose composition is different from "normal" food. In practice, this involves calorie modified foods, baby and infant foods, energy foods, special health foods including diabetic and weight control foods, vitamin and mineral supplements, medicinal herbs, and bottled water. Also, any food making a nutritional claim falls under the NNI's purview.

The registration process for special dietary foods involves two technical committees:

- 1) An NNI internal Technical Review Committee (TRC) comprised of NNI researchers that includes biochemists, food technologists, pharmacists, medical doctors, and nutritionists.
- 2) A Higher Committee for Nutrition, used as an advisory committee to the NNI and is responsible for the final approval of all special dietary foods.

The Higher Committee for Nutrition is comprised of representatives from MOH (Undersecretary for Health), universities (pharmacy, food technology), directors of research institutes (e.g., Food Technology Research Institute), and the vice-president of the Egyptian Academy of Sciences.

To register a product, the interested party must submit an application form that includes product name, manufacturer, country of origin, importer (if imported product), ingredients and specifications, the manufacturing process, a certificate of analysis, health certificate, and a certificate of free sale.

Samples are submitted and analyzed to ensure the product meets the nutritional claims, and to test for the presence of heavy metals, pesticide residues, and microbial contaminants. Labels are reviewed and claims verified. The results are forwarded to the NNI-TRC for review.

The recommendations of the NNI-TRC are forwarded to the Higher Committee for Nutrition's review. A consensus is reached for approval. If the application for approval is denied, the applicant can resubmit the product for consideration with corrections made to accommodate the reason for non-approval.

Once the product is registered and all other import requirements are fulfilled, no licensing requirements are needed.

Documents required for the registration of imported nutritional product:

- a) Application for registration of nutritional product from NNI signed and stamped NNI officials.
- b) Certificate of analysis and declaration of composition signed by officials from the manufacturing firm (it is advised to include a company logo-stamp alongside signatures).
- c) Six original outer labels to be placed in a file for reference.
- d) A copy of the trade and tax card of the applicant.
- e) A copy of tax registration.
- f) A copy of the applicant import card.
- g) Eight to ten product samples with Arabic labels.
- h) Contract between manufacturing company and importer, which contains all product names. The contract must be approved by a representative chamber of commerce and legalized by the Egyptian embassy in the country of the origin.
- i) Certificate of free sale that includes the product name legalized by the Egyptian embassy at the country of origin (must contain the statement "product is freely sold in the country of origin").
- j) Good manufacturing practices (GMP) certificate from the manufacturing company legalized (stamped) by a relevant chamber of commerce and the Egyptian embassy at the country of the origin.
- k) Halal certificate (if applicable).

It is advisable for exporting firms to include any state-issued certificates of wholesomeness or health, as possible, in order to expedite registration approval.

If the product contains gelatin, the applicant must disclose the source of the gelatin. Importers must apply for an import license, and the approval process may take between one to six months. If a similar dietary product is available in the local market, the application will not be approved.

Feed Enzymes and Probiotics

1- Registration:

The product has to be registered in the Regional Central Lab for Food and Feed in order to get the import permit. This is done by the Importer who has to provide the following documents:

- Certificate of Analysis
 - Certificate of Composition
 - Certificate of Origin (countersigned by the Chamber of Commerce and notarized by the Egyptian Embassy or Consulate in the country of origin)
 - Authorization letter from the U.S. Exporter to the Egyptian importer countersigned by the Chamber of Commerce and notarized by the Egyptian Embassy or Consulate in the U.S.
- 2- Once the Product is registered an import permit is granted to the Egyptian importer and the documents needed for customs to import are :
- Bill of Lading
 - Commercial Invoice(countersigned by the Chamber of Commerce and notarized by the Egyptian Embassy or Consulate in the country of origin)
 - Certificate of Origin (countersigned by the Chamber of Commerce and notarized by the Egyptian Embassy or Consulate in the country of origin)
 - FDA Certificate of Free Sale (only if raw materials are exported) does not apply for end product
 - Packing List
 - Certificate of Insurance
 - Import Permit (issued to Egyptian importer)
 - Payment Guarantee (Form 11) from a local bank advising that payment has been transferred to the supplier.

Section VIII: Other Certification and Testing Requirements

See FAIRS Certificate Report for full listing of required certificates.

The certification requirements for imported food products differ according to the product. For example, veterinary certificates are required for meat, poultry, fish and dairy products. If the product is further processed in another country during transit, the appropriate certification may be executed in the country where the additional processing is done.

A number of certificates are required for all imported food products:

- Certificate of Origin
- Export Certificate (FDA Certificate of Free Sale, Sanitary, Phytosanitary – varies by product)
- Islamic Halal Certificate (if applicable)

The above certificates should be countersigned by the country of origin's chamber of commerce and notarized by the Egyptian Embassy or Consulate in the country of origin. Importers must present one set of all documents to GOEIC.

Under Ministerial Decree 1647/1997, in order to import meat and live animals, an importer must submit a request to GOVS indicating:

- a) The number and type of animals or meat being imported.
- b) Country of origin.
- c) Shipping port.
- d) Expected date of arrival.

- e) Means of transportation.

GOVS examines the request according to the epidemiological status of the country of origin. If the epidemiological status permits importation, the importer is issued a permit. The permit is valid for one month. The importer can renew the approval if importation does not occur within one month. No fees are charged for the import permit.

Under Decree 465/1997, the importation of poultry and meat products must meet the following requirements:

- a) Products must be shipped directly from the country of origin to Egypt.
- b) Products must be packaged in appropriate bags as required by the Egyptian standards. Labels must be inserted *inside* the package as well as on the outside carton (see Labeling Section).

Release by the veterinary authorities depends heavily on the import license. If there is any discrepancy between the import license and the shipping documents, the product will be rejected. Exporters and importers should be completely familiar with all of the information required for the pre-approval license check with GOVS for additional information and instructions.

Product Sampling

All product samples should be representative of the consignment and should be drawn during the unloading process. A committee is formed to withdraw random samples every time a shipment arrives in port (i.e., the Physical Examination Committee).

One representative sample (specified in size) is drawn from each consignment and all inspection agencies involved will conduct their inspections and testing on it. Tests may be conducted by three different laboratories.

Batch numbers are required for all food products in order to facilitate product sample withdrawal. Each batch will be considered as a different item for sample withdrawal purposes.

Samples will be drawn from each batch having different production and expiration dates. Products with different dates are considered to be different items and should be identified as such on the Release Certificate.

Cleanliness must be assured when samples are taken to avoid contamination. Also, the committee is supposed to take the necessary steps to assure the soundness of the product samples while they are being transported to the laboratory for analysis. The sampling results are indicated on the Form of Examination Results.

According to Decree 232/ 1996 issued by MOH, the following provisions are to be taken into consideration when samples are withdrawn:

- a) The consignment should be treated as a single shipment;
- b) The samples should be divided according to batch sizes and type of product;
- c) The samples should be distributed among the laboratories so as to avoid repetition;
- d) All label information should be presented on the "Sample Analysis Form."
- e) If a consignment is imported from various origins or product sources, each should have a distinctive and confidential number.

Pre-shipment testing requirements:

For purchases of wheat by the Egyptian government, Egypt requires that a six-member inter-agency committee inspect wheat at origin prior to shipment. The joint committee is composed of two members each from CAPQ, GOEIC, and MOH.

This applies only to wheat imports by the General Authority of Supply Commodities (GASC), the entity responsible for public sector imports; however, it is optional for wheat imports done through the private sector.

Section IX: Import Procedures

The initial import procedure entails the assignment of a shipping agent (separate from the vessel shipping agent); arrival of the consignment at port and a comparison of the invoice and bill of lading with the ship's manifest; issuance of a title transfer document to the importer; the unloading of the consignment; the purchase and completion of the "Importation Form" and registration of the consignment with Egyptian Customs authorities in the so-called "No. 46 Book;" and initial tariff classification of the product.

Egyptian companies often rely on customs brokers, or their own staff to check on shipments and to clear products through customs.

In general, the following documents must be presented to the customs office in order for a shipment to be released:

- Bill of Lading
- Commercial Invoice
- Certificate of Origin (countersigned by the Chamber of Commerce and notarized by the Egyptian Embassy or Consulate in the country of origin)
- Export/Health Certificate (FDA Certificate of Free Sale, Sanitary, Phytosanitary – varies by product)
- Packing List
- Certificate of Insurance
- Import Permit (issued to Egyptian importer)
- Payment Guarantee (Form 11) from a local bank advising that payment has been transferred to the supplier.

The following documents may be required, depending on product:

- A letter from the bank indicating that all administration fees have been paid. If this letter is not submitted, all administrative expenses must be paid at the port.
- Radiation Certificate.

The time required for importation ranges from 13-15 days. Egypt has five major ports: Damietta, Alexandria, Port Said (east), Port Said (west), and Sokhna (Suez).

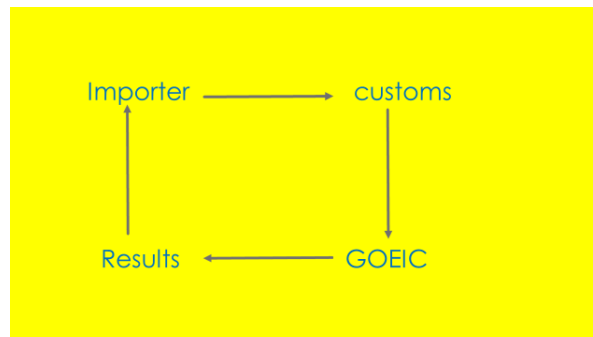
In case of a rejection, according to Article 117, Chapter 4 of Decree 770 /2005, the exporter or importer may appeal the final inspection results no later than one week from the date of rejection. The concerned party shall file an appeal to the Appeal Committee Secretariat. The appeal shall be accompanied by a receipt of a L.E. 5 security which shall be reimbursed if the appeal is accepted.

The committee shall decide whether to accept the results of the final inspection, or to amend the results, or annul them. They can also authorize a re-inspection of the consignment, or allow for treatment. If the former is applied, then the committee shall name a specialized inspection laboratory to re-inspect the

consignment and allow the complainant the chance to attend the inspection procedures. The committee's results shall be deemed final and may not be contested.

The Board Chairman of the General Organization for Exhibitions and International Fairs (GOEIF) may allow exhibitors at exhibitions and fairs, to directly sell goods imported for display at exhibition sites identified by the GOEIF. The sale shall be supervised by GOEIC and by Customs, provided that import procedures, except for the certificate of origin and the bill of lading from the country of origin, are completed.

Figure (1) Import control procedure



The final results of the inspection shall be issued no later than 10 days except for canned food, bottled water, and for goods subject to dioxin testing, which shall be released no later than 15 days.

Section X: Copyright and/or Trademark Laws

In June 2002, Egypt passed the Intellectual Property Rights (IPR) Law 82/2002, which deals with copyright's legal rights and enforcement procedures, expedited trademark registration, and piracy protection. The IPR Law replaced public law 57/1939 on trademarks and information, 132/ 1949 on patent and industrial drawings, and 354/1954 on copyrights. Yet, Egypt was still not in full compliance with the TRIPs agreement in October 2013, with the biggest problems involving pharmaceutical patents and IPR settlement.

Article 63 of the IPR Law 82/2002 defines trademarks as names that adopt a distinctive form, signatures, words, characters, figures and drawings. The Commercial Registration Department of the Ministry of Supply and Internal Trade is responsible for registering trademarks. Articles 73–84 detail the registration process. Article 73 requires the applicant to submit a trademark request to the department, which is responsible for notifying the applicant within 30 days of issuing the decision. It takes approximately from 9 to 12 months to register a logo or a brand name. Once approved, it is announced in the “Trademark Newspaper.”

A number of certificates and documents including the following items must be submitted during the registration process:

- A sample of the logo and brand name.
- A certification of the company's incorporation in its home country.
- A certificate issued by the Commercial Register in Egypt affirming that the proposed name of the company or logo has not been registered in Egypt.

The company must apply for a “Trademark Examination Form” to check whether a similar trademark for the product already exists in the market.

If a foreign company wishes to protect its logo, the company has to supply the General Administration for Trademark with an example of its logo as registered with the World Intellectual Property Organization (WIPO). The foreign company should employ an agent in Cairo to follow the trademark registration process.

Article 90 provides trademark protection for ten years, starting at registration. After the ten-year period, the trademark's owner has six months to submit a renewal for protection, which can be extended for several different periods. However the new law grants automatic trademark status to internationally known products without registering with the Commercial Registration Department.

Appendix I: Government Regulatory Agency Contacts

Ministry of Agriculture and Land Reclamation (MALR)

The Central Administration of Plant Quarantine (CAPQ)

Contact: Dr. Saad Mohamed Mousa

Title: Head of the Central Administration for Plant Quarantine,
Ministry of Agriculture and Land Reclamation,

Tel: (202) 3335-1625 or (202) 37608575 Fax: (202) 3760-8574

Email: capqoffice@gmail.com

General Organization for Veterinary Services (GOVS)

Contact: Dr Ibrahim Mahrous

Title: Chairman

Tel: (202) 3748-1750 Fax: (202) 3748-1763

Email: govs-egypt@govs.gov.eg

<http://www.govs.gov.eg/FrontEnd/en/Default.aspx>

Central lab of Residue Analysis of Pesticides & Heavy Metals

Contact: Dr. Ashraf Al Marsafy

Title: Director

Tel: (202) 3748-6163 Fax: (202) 3761-1216

Email: qcap@link.net

<http://www.qcap-egypt.com/myPage.aspx?id=36>

Regional center For Food and Feed (RCFF)

Contact: Dr. Gihan Mogazy

Title: Director

Tel: (202) 3572-2069 / 572-3906 Fax: (202) 3572-2609

Email: clff@intouch.com

<http://www.rcff.com.eg/>

The Agriculture Pesticide Committee (APC)

Contact: Prof Mohamed Abdel Meguid

Title: Chairman of APC

Tel: (202) 37480576

Email: Chairman@apc.gov.eg

<http://www.apc.gov.eg/en/>

Animal Health Research Institute
Reference Laboratory For safety Analysis of Food of animal origin
Contact: Dr Mohamed Agour
Title: Director of Animal Health research Institute
Telephone Numbers: (202) 33374856 - 37489022
Fax: (202) 33350030
Email: Ahri@arc.sci.eg
<http://www.ahri.gov.eg/>
Ministry of Health (MOH)

Central Labs Administration
Contact: Dr Ahmed Safwat
Title: Director
Tel: (202) 27950096 Fax: (202) 2796-2248
Email: centralhealthlabs@yahoo.com
<http://www.healthlabs.net/>

National Nutrition Institute (NNI)
Contact: Dr Zeinab El Sedafi
Title: Director of the National Nutrition Institute
Tel: (202) 25324315- 2364-6413 / 3522
Fax: (202) 2364-7476
Email: nniegypt@nni.org.eg
http://www.nni.org.eg/contactus_ar.htm

Ministry of Trade and Industry (MTI)

Egyptian Organization for Standardization and Quality control
Dr Hassan Abdel Megiud
Title: Chairman
Tel: (202) 22845524 (202) 22845528
Fax: (202) 2603-1351
Email eos@idsc.net.eg
<http://www.eos.org.eg/public/en-us/>

General Organization for Export and Import Control (GOEIC)
Contact: Eng. Mr Alaa Abdel Karim
Title: Chairman
Tel: (202) 2266-6847 Fax: (2-02) 2266-9668
Contact: Dr. Nour Abu El-Ela
Title: Head of the Food Imports Division
Tel: (202) 2266-9609
Fax: (202) 2266-9668
Email: dr.nor2@hotmail.com

http://www.goeic.gov.eg/en/index_R.asp

Ministry of Finance (MOF)

Egyptian Customs Authority

Contact: Mr Magdy Abdel Aziz

Title: Chairman

Telephone Number: (202)234-22152 - (202)234-22153 - (202)234-22154

Fax Number: (202)234-22280 - (202)234-22281

E-mail: info@customs.gov.eg

<http://www.customs.gov.eg/>

Ministry of Supply and Internal Trade (MOSIT)

Inter-Ministerial Committee for Foreign Aid

Contact: Dr Mohamed Abdallah Badr

Title: Deputy Chairman for Inter -ministerial Committee for Foreign Aid

Tel: (202) 26700029 / 22705533

Fax: (202) 22700075- 2270202872

Email: imcfa@yahoo.com

Internal Trade Development Authority

Contact: General Ahmed Al Idrissi

Title: Chairman of the Commercial Registration Office and General Administration for Trade Marks

Tel: (202) 22718974

Fax: (202) 26720452

APPENDIX II: Laws and Regulations Governing Egypt's Food System

PRESIDENTIAL DECREES

- Egypt's Presidential Decree 184 (2013) increasing import tariffs on some agricultural products including fish, cut flowers, and fresh and dried fruits and nuts
- Presidential decree No. 103 of 2008 reducing maximum tariff rates on some products.
- Presidential decree No. 39 of 2007 reducing maximum tariff rates.
- Presidential Decree No. 106 of 2000 centralizing the process of inspection and certification of imported products under GOEIC.
- Presidential Decree No. 250 of 1999 banning some products from the EU.
- Presidential Decree No. 243 of 1998 reducing maximum tariff rates.
- Presidential Decree No. 619 of 1998 for importation of durable and non-durable goods.

MINISTRY OF AGRICULTURE

- Ministerial Decree No. 1495 of 2014 regarding the formation of a new national biosafety committee

- Ministerial Decree No. 1660 of 2014 regarding the Phytosanitary Requirements and Specifications for the Importation of Seed Potatoes for Growing Year (2014/2015)
- Ministerial Decree No. 1018 of 2013 concerning Agricultural Pesticides Registration and Handling
- Ministerial Decree No. 448 of 2012 bans the import of heat-treated feather meal.
- Egypt's Ministerial Decree No. 266 of 2011 adopted the European Economic Commission (EEC) Regulation 2377 (1990) that calls for a maximum residue limits (MRL) for veterinary drugs in food products of animal origin.
- Ministerial decree No. 2128 of 2011 which puts restrictions on age, cuts, processed meat and others from BSE controlled risk status countries
- Ministerial Decree No. 2188 of 2011 constituting the Agricultural Pesticide committee
- Law 82 of 2002 for Plant Variety Protection
- Ministerial Decree No. 3007 of 2001 for Plant Quarantine
- Ministerial Decree No. 1073 of 1998 for Leucosis
- Ministerial Decree No. 9 of 1997 for meat importation.
- Ministerial Decree No. 1647 of 1997 for issues related to the importation of meat and live animals.
- Ministerial Decree No. 874 of 1996 forbidding testing, importation, usage of pesticides classified as "B" and "C."
- Ministerial Decree No. 25 of 1982 for product sampling.

MINISTRY OF TRADE & INDUSTRY

- Ministerial Decree No. 693 of 2015 regarding production and importing of vegetable oils used for food according to the Egyptian Standard 7985
- Ministerial Decree No. 708 of 2015 regarding the resumption of rice exports
- Ministerial decree No. 859 of 2012 regarding the shelf life periods for food commodities with the exception of Cereals and legumes
- Ministerial decree No. 2613 of 2008 Parts A&B regarding the general conditions of the shelf life periods for food products (part A) and shelf life periods (Part B)
- Ministerial Decree No. 434 for 2008 for shelf life periods for the food products
- Ministerial decree No. 285 for 2006 for the periods remaining in the established shelf life for the imported food products.
- Ministerial Decree No. 120 for 2006 for new labeling requirements for frozen beef.
- Ministerial Decree No. 130 of 2005 concerning compliance with technical regulations in production according to the standard specifications.
- Ministerial Decree No. 524 of 2000 for Inspection and Samples Withdrawal.
- Ministerial Decree No. 552 of 2000 for inspection certificates.
- Ministerial Decree No. 423 of 1999 amending Ministerial Decree No. 619 of 1998.
- Ministerial Decree No. 163 of 1999 for labeling canned, frozen and packed food products.
- Ministerial Decree Nos. 179, 180, and 181 of 1996 issued by the Ministry of Industry listing Egyptian product specifications and mandatory standards.

Ministerial Decree No. 107 of 1994 and Egyptian Standard No. 2613 for shelf-life standards.

MINISTRY OF HEALTH

- Ministerial Decree No.204 of 2015 regarding food additives example food colorings, food preservatives and Antioxidants that are accepted for use by the food industry.
- Ministerial Decree No. 73 of 2001 for packaging materials.
- Ministerial Decree No. 53 of 1996 for product sampling and test analysis.
- Ministerial Decree No. 354 of 1996 for product rejection.
- Ministerial Decree Nos. 232 of 1996 and 349 for product sampling.
- Ministerial Decree Nos. 302 of 1986 and 782 of 1984 for product sampling.