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GAIN Report

Global Agricultural Information Network

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Egypt

Food and Agricultural Import Regulations and Standards - Narrative

FAIRS Country Report

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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. The Minister of Agriculture announced recently that his ministry will take the lead in establishing a Food Safety Authority, which would consolidate Egypt's disparate food safety system. Egypt's food control systems and food control infrastructure consist of food laws and accompanying regulations and ministerial decrees, food inspection services, and laboratories for technical support.

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, who are normally best equipped to research such matters with local authorities, before any goods are shipped. 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 and 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 decree reduced the list of imports requiring inspection for quality control to 101 classes from 5,700, allowing 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 of import and export consignments, 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 to collect food samples and test these at its central public health labs for chemical, toxicological, and microbiological analysis.

The Ministry of Agriculture and Land Reclamation’s Regional Laboratory for Food and Feed (RLFF) is responsible for monitoring imported and domestic feed and feed ingredients. The General Organization for Veterinary Services (GOVS) of MALR is responsible to protect 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 to draft and enforce import regulations for 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 2014 study, going through customs procedures (from berthing at the port to final destination delivery) takes an estimated 12 days, one day shorter 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 2014, the World Bank ranked Egypt 83 out of 189 countries for trading across borders, little changed from being 81 out of 185 countries from the 2013 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:

- In May 2014, Egypt submitted two notifications to the World Trade Organization (WTO) amending the standards for beef products. These notifications disallow beef from cattle treated with synthetic hormones and establish MRLs for naturally-occurring hormones in foodstuffs of animal origin. Egypt's Ministerial Decree No. 266/2011 adopted the European Economic Commission (EEC) Regulation 2377 (1990) rather than adoption of Codex standards. Egypt's regulations regarding testing for synthetic hormones present a threat to U.S. (and other supplier) exports of beef products to Egypt. If applied, the MRLs for the natural hormones that have been set will also cause considerable confusion and rejections of all kinds of beef, no matter the origin and whether from cattle treated with hormones or not.
- MALR, Ministerial Decree 448/ 2012 banned the import of heat-treated feather meal. Egypt cites AI contamination and nutritional value concerns as a justification for the ban.
- Based on the Ministerial Decree No. 426/2009 issued by MALR concerning the freedom of cereal consignments from *Ambrosia artemisiifolia*. The Central Administration for Plant Quarantine (CAPQ) of MALR requires that wheat, soybean and corn imports be free from ambrosia seed. If ambrosia seeds are detected by a 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 per kilogram as the maximum tolerance level of noxious weed seeds.
- Egypt has not yet signed a protocol for seed potato imports from the United States, despite four years of negotiations.
- The continued import ban on poultry parts which dates from 2003. In 2006, Egypt relaxed the ban after the outbreak of Avian Influenza, limiting imports to whole birds. This exclusion of poultry parts and offal is contrary to Egypt's international obligations as it lacks any scientific

basis.

Section II: Food Additive Regulations

On October 1997, MOH issued Decree No. 411 increasing the number of artificial colors allowed in food products. The following colors are permitted:

Artificial colors:

- Curcumin
- Riboflavin: lactoflavin
- Riboflavin-5-phosphate
- Tartrazine: FD & C yellow no. 5
- Quinoline yellow
- Sunset yellow FCF: FD&C yellow no. 6
- Carmines: cochineal extract
- Carmoisine (azorubine)
- Ponceau 4 R: cochineal red A, new coccine
- Red 2 G: azogeranine
- Allura Red AC: FD&C, red no. 40
- Indigotine: FD&C, blue no. 2
- Brilliant blue FCF: FD&C, blue no. 1
- Chlorophylls and chlorophyllins:
- Chlorophylls
- Chlorophyllins
- Copper complexes of chlorophylls and Chlorophyllins
- Copper complexes of chlorophylls
- Copper complexes of Chlorophyllins sodium and potassium salts
- Fast green FCF: FD&C, green no. 3
- Plain caramel
- Caustic sulphite caramel
- Ammonia caramel
- Sulphite ammonia caramel
- Brilliant black PN
- Brown HT: chocolate brown HT
- Carotenes
- Mixed carotenes
- Beta carotene
- Annatto extracts (bixin, norbixin)
- Paprika extract, paprika oleoresins
- Lycopene; gamma carotene
- Beta-apo-8-carotenal
- Ethylester-beta-apo-8-Caro
- Lutein: xanthophylls
- Beetroot red (beet red)
- Anthocyanins
- Grape skin extract

- Calcium carbonate
- Titanium dioxide

Though it is apparently Acceptable artificial colors are not always allowed in all food products. Exporters should check with MOH to verify the acceptability of any food coloring.

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 of 2001, which mandates 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.

Natural Colors:

The following natural colors extracted from fruits and plants are approved:

For fruit juices, concentrate, powders:

- Berries, currants (black currants)
- Citrus fruits
- Drupes (cherry, plum, and prunes)
- Melon family
- Rose hips (hipberries)
- Tomato
- Pineapple, mango, kiwi

For vegetables, vegetable juice and powder:

- Pulses (pea flower)
- Carrot
- Cabbage
- Beetroot
- Spinach
- Nettles (Urtica)
- Alfalfa
- Yellow and red turnip
- Sweet potato
- Capsicum varieties (cayenne pepper)

For cereals, fermented and roasted:

- Maize
- Purple corn
- Rye
- Barley

For spices, herbs, and flavorings:

- Saffron
- Sandelwood (red)
- Carthamus red, yellow (safflower)

- Paprika
- Sage
- Parsely
- Shallots
- Violets
- Burdock

Others:

- Malt
- Molasses
- Yeast
- Cocoa
- Coffee
- Egg yolk
- Carob flour
- Liquorice
- Honey
- Burnt Sugar
- Hibiscus
- Tea
- Mate
- Crustacea
- Nuts
- Mushrooms

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 No. 478 of 1995 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 by Codex also are approved for use in Egypt.

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

Ministry of Health (MOH)

3 Magles El Shaab St., Cairo

Tel: +20 (2) 2794-1507, +20 (2) 2794-0526, +20 (2) 2794-0233, +20 (2) 2794-2865, +20

Fax: +20 (2) 2795-3966

E-mail: webmaster@mohp.gov.eg

Website: <http://www.mohp.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

Laws and Regulations:

Ministerial decree No. 2188/2011 established the Agricultural Pesticide Committee (APC) which sits within the portfolio of the Minister for Agriculture and Land Reclamation and is the authority responsible for registering agricultural pesticides based on two major criteria: effective against agricultural pests and safe to public health and the environment.

Ministerial decree No. 1018/2013 explains the role of the APC as the only Egyptian authority accountable for the assessment, evaluation and registration of agricultural pesticides, up to the point of retail sale. The decision making process in the APC and its peripheral subcommittees integrates experimental data with social, economic, and environmental interests of the community.

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

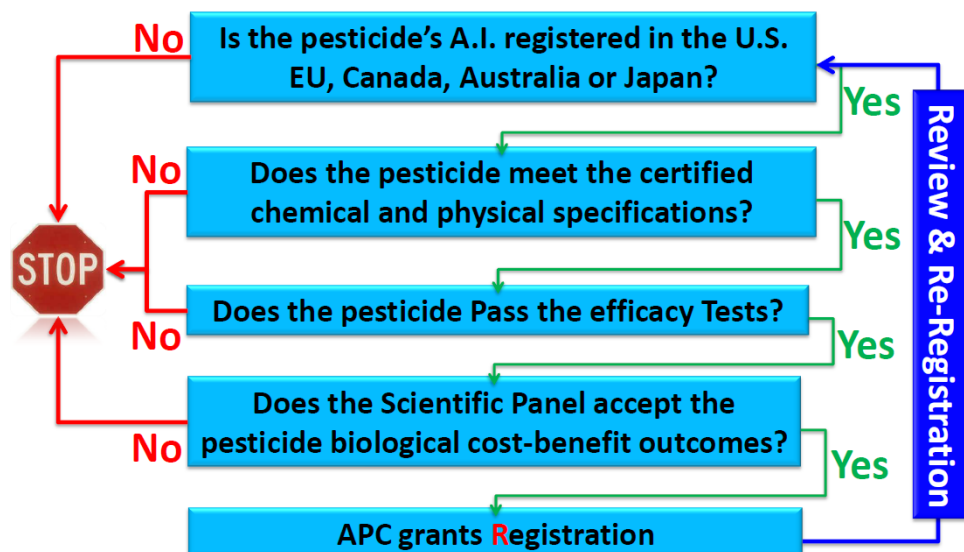
APC functions:

- Licensing
- Labelling
- Efficacy Testing
- Import/export procedures
- Good manufacturing processes
- Distribution
- Quality control
- Use and storage
- Disposal
- Dosage application
- Update of legal texts
- Accreditation of foreign manufacturers
- Training

Registration Process:

APC sets four Critical Control Points (4-CCP) to build a Registration Eligibility Decision (RED) as illustrated in figure (1).

Figure 1: Registration Eligibility Decision



Source: "Egypt Pesticide Registration and Regulatory Systems"

Presentation by Dr Yehia Ibrahim. APC website <http://www.apc.gov.eg/en/default.aspx>

1. The stakeholder presents a pesticide-registration application to the APC after paying the registration fees. A preliminary file containing the required technical data about the pesticide and attached to the application must be submitted.
- 2- A technical committee reviews the preliminary file of the pesticide and determines its registration status in the EU, US, 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 then 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 Central Pesticides 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 who must confirm that the samples are ready to be analyzed and examined. The experimentation officer then sends the samples to the Central Pesticides Laboratory to analyze its physical and chemical properties.
- 7- In case the analysis of the pesticide sample does not meet the required specifications and scientific data, the stakeholder can submit a claim to the Central Pesticides Laboratory to retest the product. If the second test fails the required criteria, the analysis stops.
- 8- If the analysis meets the required chemical and physical properties stipulated, 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 No. 1018 /2013, the Central Pesticide 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 person 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.
- 12- 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 a fair and balanced scientific judgment regarding file approval.
- 13- If 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 and packaging
- Mammalian and ecological toxicity

- Field trial information
- Laboratory analysis (methods & results)
- Efficacy data
- Health risk assessment
- Emergency procedures
- Recommended use
- Label requirements, etc.

14- 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.

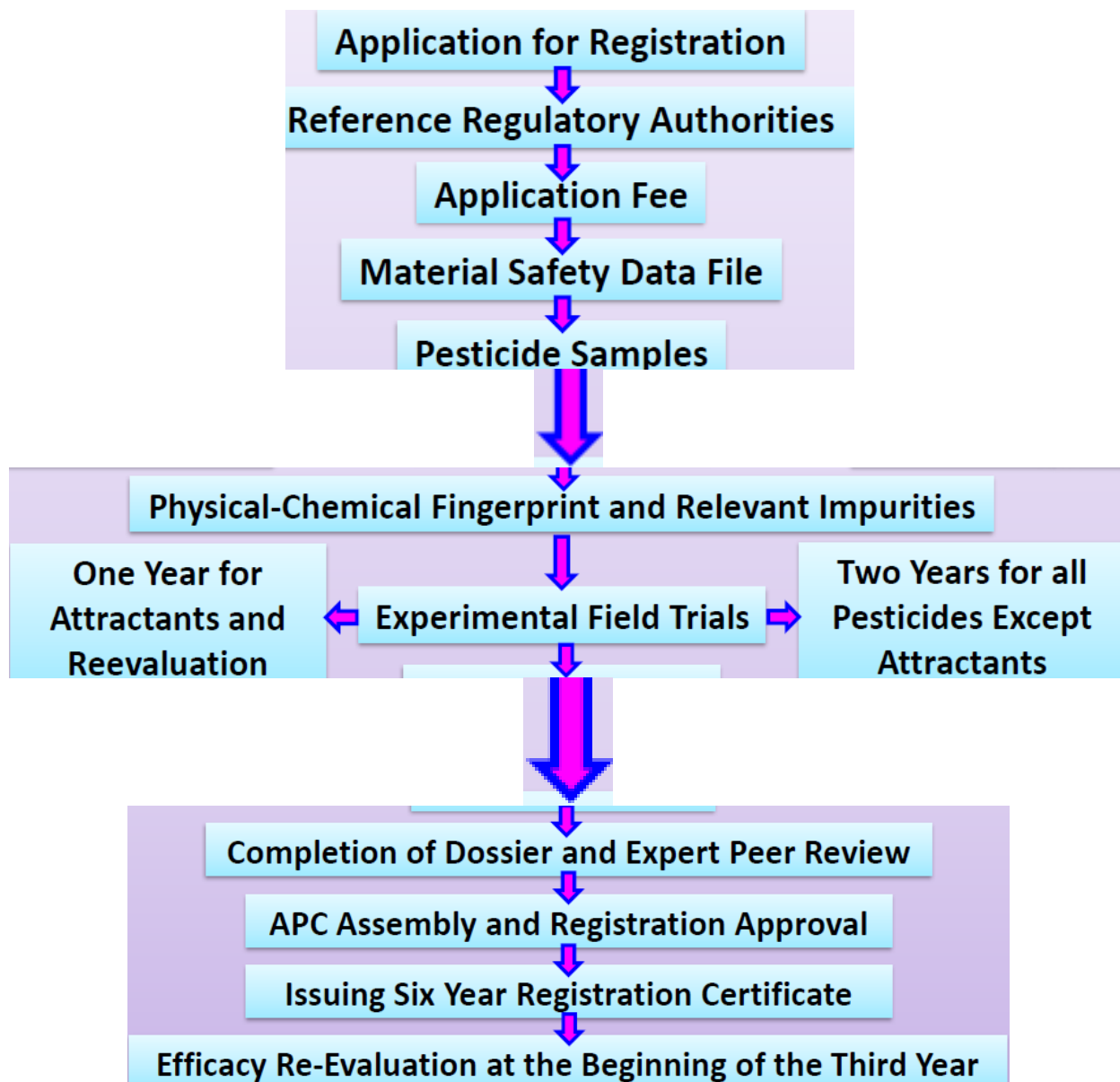
15- Three copies of a registration certificate are issued, one for the APC secretariat, one for the Pesticides Central Laboratory and another copy for the stakeholder.

16- The registration certificate is valid for six years from the date of issue. Registering the efficacy of the pesticide is a must before the first three years of the validity of the registration certificate lapses.

17- After the registration certificate is issued, the stakeholder has to submit an application for a pesticide identification card, which must be renewed every two years.

18- 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 valid.

Figure (2) Pesticide Registration Process



Source: "Egypt Pesticide Registration and Regulatory systems"

Presentation by Dr Yehia Ibrahim. APC website <http://www.apc.gov.eg/en/default.aspx>

Adherence to International Undertakings with Direct Implications for Pesticides

According to Article (28) of the Ministerial Decree 1018/2013, Maximum Residue Limits (MRLs) of the Codex Alimentarius, the EU or values set by US 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.

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 to examine and test for pesticide MRLs of fresh fruit and produce, ensuring that that MRL's do not

exceed the limits according to Egyptian regulations.

For More information on Pesticide Import requirements and registration and information on approved Pesticides and allowed MRL's U.S exporters can contact:

Ministry of Agriculture and Land Reclamation (MALR)

The Agriculture Pesticide Committee (APC)

Contact: Prof Mohamed Abdel Meguid

Title: Chairman of APC

Tel: (2-02) 37480576

Email: Chairman@apc.gov.eg

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

CENTRAL LAB of Residue Analysis of Pesticides & Heavy Metals in Food

Contact: Dr Ashraf Al Marsafy

Title: Director

Tel: (202) 3761-1282

Fax: (202) 3761-1216

Email: ashraf.elmarsafy@qcap-egypt.com

Contaminants

Aflatoxins:

For aflatoxins, Egypt follows the European Union (EU) maximum limits for total aflatoxins and Aflatoxin B1 which are set in the Commission Regulation (EC) No 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:

	ug / Kg	ug / kg
Food item	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. There have been occasional findings of dioxin presence in imports of U.S. beef as well as from other suppliers that exceed Egypt's permissible dioxin levels, especially in liver. Egypt applies EU regulations in testing for dioxin EU No. 1881/2006 and EU

No. 1259/2011. The current MRLs for beef liver is 6pg TEQ/g fat. In April 2014, Egypt reduced the sampling and testing for dioxin to 25 percent after MOH's Higher Food Safety Committee revised its requirements that were based on three month period of shipments that met Egypt's MRL levels. The committee convenes every 3 months to revise inspection frequencies for imports from all origins.

Section IV: Packaging and Container Regulations

According to Ministerial Decree No. 73/2001 for Packaging Materials issued by MOH, Egypt has no special packaging or container size requirements, regulations, or preferences, and 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 in Egyptian Standard 1546/2011 and required for 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 use instructions (optional).
- h. Product ingredients.
- i. 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.")
- j. Net weight
- k. Gross weight and total number of the packages per case or carton
- l. If the product contains preservatives, the percentage of each preservative should be indicated
- m. If the product is meat or poultry, the following statement must appear: "slaughtered according to the Islamic ritual" or "Halal slaughtered"
- n. However, the following items are exempted from labeling:
- o. Small items whose greater surface is 10 cm square or less.

- p. Milk and beverage packs whose quantity is 200 milliliters or less.
- q. 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 February 2006, the Minister of Trade and Industry issued decree No. 120 /2006 stating that frozen beef products 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 fat content percentage must also be written on the label. 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.

Such entity 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 with 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 Arab-American Chamber of Commerce or by an Egyptian Consulate.

A Halal certificate is required for the following products:

- For fresh/frozen unprocessed product - Product bearing "*Halal*" label claims must be accompanied by an appropriate Halal certificate.
- For processed products with "*Halal*" label claims - Raw materials used in processed products

with "*Halal*" label claims must be accompanied by an appropriate Halal certificate.

Expiration Period:

The Minister of Trade and Industry issued Decree No. 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 products, with the exception of grains and oilseeds, the expiration period left for human consumption starts from the day the shipment arrives at an Egyptian port 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 life.
- 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. When a frozen poultry sample is thawed, the amount of water collected must not exceed five percent.

A. 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. biotech products are allowed to enter Egypt without restriction. No decisions on the labeling of biotech-derived food products have been made. 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, who is a strong supporter of agricultural biotechnology and science-based risk assessment, issued Ministerial Decree No. 1495/2014 regarding re-establishing the Egyptian National Biosafety Committee (NBC).

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 the pertinent international organizations such as ISO, IEC or Codex Alimentarius.

Egyptian standardization commenced in 1957 with the formation of the 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 No. 180/1996 allows importers to choose a relevant standard from seven international systems including: ISO, European, American, Japanese, British, German –and for food, Codex.

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 food additives and colors' chemical and physical composition, ensuring 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 standard(s).

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 seek 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. In 2015 the government is contemplating the inclusion of representatives from the Cairo university and Islamic institution, Al Azhar, to accompany GOVS veterinarians on the audits. Beef plant audits in the United States are implemented by veterinarians from GOVS in cooperation with the US 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 the composition of which is different from the traditional, conventional 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 (HCN), which is used as an advisory committee to the NNI and is responsible for the final approval of all special dietary foods. The HCN 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 for the HCN'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 from the responsible official.
- b. Certificate of analysis signed and stamped from the manufacturing company.
- c. Declaration of composition (qualitative & quantitative) signed & stamped from the manufacturing company.
- d. Six original outer labels to be placed in a file for reference
- e. A copy of the trade and taxes card of the applicant Copy of register of the trade& taxes A copy of the applicant import card
- f. Eight to ten product samples with Arabic labels.
- g. Contract of agency from the manufacturer company (contain all the product names) legalized from the commercial chamber & Egyptian embassy at the country of the origin
- h. Certificate of free sale that includes the product name and composition, notarized by the commercial chamber and Egyptian embassy in the country of origin (must contain the word of "the products are freely sold in the country of origin").
- i. Good manufacturing practices (GMP) certificate from the manufacturing company notarized by

- the commercial chamber & Egyptian embassy in the country of the origin.
- j. Safety certificate notarized by the commercial chamber & Egyptian Embassy in the country of the origin.
 - k. Halal certificate.

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 already available in the local market, the application will not be approved.

Section VIII: Other Certification and Testing Requirements

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

1. Certificate of Origin
2. Bill of Lading
3. Health Certificate
4. Veterinary Certificate (for meat, poultry, fish and dairy products)
5. Islamic Halal Certificate, "if applicable"
6. Temperature Certificate (for frozen, deep frozen and chilled products)
7. Analysis Certificate, "if applicable"
8. Weight and Packaging Certificate

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. 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. Under Ministerial Decree No. 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 No. 465/1997, imported 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 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.

A number of other certificates are also required for animal products:

- Islamic Halal Certificate
- A Certificate of Origin showing the name of the exporting country, number of parcels, type of meat, date of inspection, production and expiration dates, name of exporter, port of entry, and name of consignee.
- A Veterinary Certificate issued in the country of origin indicating that the animals used in making the product were examined before and after slaughter, and that they are free from contagious diseases.
- In the case of frozen meat, a certificate assuring that a temperature of -18 degrees Centigrade was maintained before export, and that each piece was wrapped in accordance with accepted international packaging standards.

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 ensure 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 No. 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.

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 customs 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. 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)
- Health Certificate
- Packing List
- Weight List
- Insurance Policy
- Import/Export Permit of the importer
- If the importer is a sole agent of a U.S. (or other foreign) manufacturer, the latter has to present an "Agency Authorization Certificate" for the products being imported.
- Form 11 from a local bank advising that payment has been transferred to the supplier. This form guarantees payment to the supplier.

The following documents are optional:

- 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.

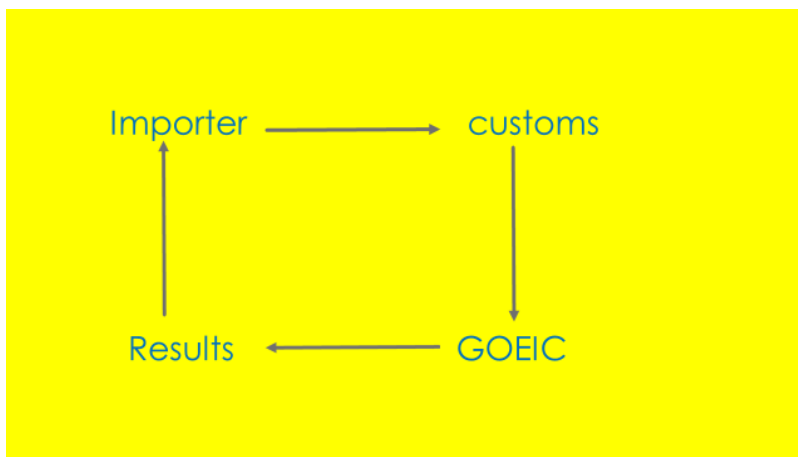
The time required for import clearance process ranges from 10 to 16 days. Egypt has five major ports: Damietta, Alexandria, Port Said (east), Port Said (west), and Sokhna (Suez).

In case of a rejection, according to Article 117, Chapter 4 of Ministerial Decree No.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, 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 (3) 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 of 2002, which deals with copyright's legal rights and enforcement procedures, expedited trademark registration, and piracy protection. IPR Law 82 replaced Law 57 of 1939 on trademarks and information, Law 132 of 1949 on patent and industrial drawings, and Law 354 of 1954 on copyrights.

Yet, Egypt still was not in full compliance with the TRIPs agreement in October 2013, with the biggest

problems involving pharmaceutical patents and IPR settlement, among others.

Article 63 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 through on 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)

1- Head of the Central Administration of Plant Quarantine (CAPQ)

Contact Dr. Mohamed Refaat Rasmy

Title: Chairman

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

Email: capqoffice@gmail.com

2- General Organization for Veterinary Services (GOVS)

Contact: Dr. Osama Selim

Title: Chairman

Tel: (202) 3748-1750 Fax: (202) 3748-1763
Email: govs-egypt@govs.gov.eg

3- 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

4- Regional Lab For Food and Feed (RLFF)

Contact: Dr. Gihan Mogazy
Title: Director
Tel: (202) 3572-2069 / 572-3906 Fax: (202) 3572-2609
Email: clff@intouch.com

5- The Agriculture Pesticide Committee (APC)

Contact: Prof Mohamed Abdel Meguid
Title: Chairman of APC
Tel: (202) 37480576
Email: Chairman@apc.gov.eg

6- Reference Laboratory For safety Analysis of Food of Animal Origin

Contact: Dr Mohamed Agour
Title: Director
Telephone Numbers: (202) 33374856 - 37489022
Fax: (202) 33350030
Email: Ahri@arc.sci.eg

Ministry of Health (MOH)

1- Central Labs Administration

Contact: Dr Nagwa Fathy
Title: Director
Tel: (202) 27950096 Fax: (202) 2796-2248
Email: centeralhealthlabs@yahoo.com

2- 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

Ministry of Trade and Industry (MTI)

1- 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

2- 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

Contact: Dr Ahmed Fawzy Ahmed

GOEIC Import Department

Tel: (202)-22669351

Email: dr_ahmedfawzy@hotmail.com

Ministry of Finance (MOF)

Egyptian Customs Authority

Contact: Mr Mohamed Al Salhawy

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

Ministry of Supply and Internal Trade (MOSIT)

1- Inter-Ministerial Committee for Foreign Aid

Contact: Dr Abdallah Badr

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

Tel: (202) 26700029 / 22705533

Fax: (202) 22700075- 2270202872

Email: imcfa@yahoo.com

2- 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. 776 of 2014 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

1. Ministerial Decree No. 73 of 2001 for packaging materials.
2. Ministerial Decree No. 411 of 1997 for food colorings.
3. Ministerial Decree No. 53 of 1996 for product sampling and test analysis.
4. Ministerial Decree No. 354 of 1996 for product rejection.
5. Ministerial Decree Nos. 232 of 1996 and 349 for product sampling.
6. Ministerial Decree No. 478 of 1995 for food preservatives.
7. Ministerial Decree Nos. 302 of 1986 and 782 of 1984 for product sampling.