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Saudi Arabia

Food and Agricultural Import Regulations and Standards - Narrative

FAIRS Country Report

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Report Highlights:

In 2015, Saudi Arabia's regulatory authorities continued to strictly enforce their food import regulations and standards which have affected the flow of some U.S. food exports to the Kingdom. The strict enforcement of import regulations included a ban on the use of unsubstantiated claim of health benefits on food products' labels; a ban on poultry and egg product exports from several U.S. states that have confirmed cases of highly pathogenic avian influenza (HPAI); and a continued import ban on U.S. beef imposed in May 2012. The FAIRS Country Report contains an update of Saudi Arabia's regulatory requirements and Customs clearance procedures for importing food and agricultural products into the Saudi market.

Disclaimer

This report is prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in (Riyadh, Saudi Arabia) for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate either because policies have changed since its preparation, or because clear and consistent information about these policies was not available. 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

The Saudi Food and Drug Authority (SFDA) is the sole Saudi government agency responsible for establishing laws concerning food and processed feed products and for conducting the inspection of locally produced and imported food products. The SFDA ascertains that these products meet all the standards and regulations established by Saudi Arabia and the Gulf Cooperation Council (GCC) countries. The SFDA is an autonomous entity chaired by the Crown Prince and reports directly to the Saudi King. The agency has a Board of Directors that consists of eight Ministers, including Health, Commerce and Industry, Agriculture, Water & Electricity, Finance and Municipality and Rural Affairs. The Board of Directors also includes the Executive President of SFDA and members from other organizations, such as Saudi Arabia Standards Organization (SASO), the Council of Saudi Chambers of Commerce and Industry, as well as food and drugs experts. All food, drinks and edible agricultural products, including food ingredients and processed animal feed whether locally manufactured or imported to Saudi Arabia are required to comply with regulations and standards set by the SFDA or the Gulf Standardizations Organization (GSO). The SFDA's Food Sector has nine Executive Departments: (1) Imported Food Control, (2) Technical Regulations and Specifications, (3) Laboratories, (4) Control of Local Markets, (5) Risk Assessment, (6) Animal Feed, (7) Surveillance and Crisis Management Centers, (8) Awareness and Communication and (9) Pesticides. Saudi Arabia has issued more than 1,000 production and testing standards for food and agricultural products since 1972.

The SFDA is the most influential member of the GSO, which consists of seven national standards bodies of the Gulf countries that includes the United Arab Emirates, Saudi Arabia, Kuwait, Bahrain, Oman, Qatar and Yemen. As a group, the GSO's main role is to create a common set of food regulations and standards. The GSO's Food Standards Committee (FSC) is responsible for drafting all new food regulations and standards and updating existing ones. The Chairmanship of the FSC rotates among member states. All GSO draft standards are submitted for review and approval to the GSO Board of Directors (BOD), which is composed of ministers responsible for standardization of each member state and meets twice a year to deliberate on standards and other related issues. Once a new standard is approved by the BOD, it should be implemented in each member state, in most cases after a grace period of six months from the date of approval. In practice, GCC countries differ concerning the timing of implementation and the enforcement of new GSO technical regulations.

GSO issues two types of official documents that govern food and agricultural products:

1. GSO Technical Regulations: all technical regulations are approved unanimously by all member countries, they replace existing national standards and their implementation is mandatory in all member countries.
2. GSO Standards: GSO standards are adopted by majority vote and their implementation is voluntary in member countries.

GSO standards are typically based on CODEX Alimentarius regulations and to some extent on European and U.S. standards, but are modified to reflect local religious, cultural and climatical conditions. GSO often adopts existing member countries standards after updating them and making sure that they conform to Codex Alimentarius guidelines and/or ISO standards. GSO Ministerial Board has authorized GSO to adopt International Standards in their original language as a fast track measure to develop and increase the total number of Gulf standards. As such, the GSO has adopted several ISO and Codex technical regulations and standards in their original language in the past few years.

The Gulf Cooperation Council (GCC) countries which includes Saudi Arabia, along with the UAE, Kuwait, Qatar, Oman, and Bahrain), has been in the process of establishing common food safety regulations to be uniformly applied in all GCC countries. Recently, the GCC Food Safety Committee issued a new Guide for Control on Imported Foods, which has been implemented by SFDA on experimental basis for unspecified period starting June 1, 2015. The GCC Import Guide contains some import requirements and certifications that caused concerns for the U.S. suppliers and could negative impact U.S. exports of agricultural and food products to Saudi Arabia and other GCC countries. Among the most concerning items of the GCC Import Guide are some health certificates for imported food products covering processed foods, meat, dairy, table eggs, fish products as well as plant and plant products. In addition, the Import Guide requires that meat and meat product must be obtained from animals not fed on processed animal protein excluding fish meal; the animals must be slaughtered in a slaughterhouse approved by the GCC authorities; and the slaughterhouse is under direct supervision of the competent authority of exporting country. Following to a request from the USG, the SFDA decided to implement the GCC Import Guide on an experimental or trial basis for unspecified period in order to allow enough time to evaluate the impact of the new required certificates on the flow of imported food and agricultural products into Saudi Arabia. In the meantime, the SFDA will continue to accept all current certificates issued by competent authorities for exported food and agricultural products from the U.S. and other exporting countries until a decision is made for implementation of a revised GCC Import Guide.

The SFDA's animal feed law, drafted by the Executive Department of Animal Feed, was approved by the Saudi government in early 2014. The department is currently working on drafting its comprehensive by-laws to commence implementation. The SFDA's final draft on Saudi Arabia's national food laws was approved by the Saudi government at the end of 2014.

Both imported and locally produced food products are subject to the same food safety regulations and labeling requirements. The SFDA's Executive Departments of Imported Food Control and Animal Feed inspect imported foods and processed feed products, respectively, at the ports of entry. The SFDA

conducts tests on imported as well as domestically produced foods, processed feed and animal products mostly at its own laboratories, but it uses other government agencies laboratories or accredited domestic private laboratories when needed.

The SFDA's Executive Department for Control of Local Markets is responsible for registering, licensing and license renewal of local food establishments (factories, distribution centers, warehouses of food and food products). It also conducts periodic inspections of facilities to ensure the implementation of licensing requirements. The agency works with the Environmental Protection Department at the Ministry of Municipality and Rural Affairs (MOMRA) to issue nationwide food sanitation laws and guidelines. MOMRA's inspectors at the municipality levels are responsible for monitoring of food products already in the market. They inspect retailers, wholesalers, restaurants, bakeries, fast food chains, vegetable and meat markets for expiration dates, sanitary and storage conditions as well as product handling. Outlets found selling unhygienic or expired products are subject to stiff financial fines or closure of facility.

The SFDA has recently started to strictly enforce Saudi and GSO food import regulations and standards, particularly those related to allowable limits for food additives and labeling requirements, which it was lenient in enforcing in past years. For example, the SFDA has recently rejected several containers of U.S. prepackaged food products for having misleading health benefits claims. In the past several months, the SFDA has imposed temporary import bans on U.S. poultry and egg products from U.S. states that confirmed the presence of highly pathogenic avian influenza (HPAI) in their poultry farms. The import ban imposed on U.S. beef in May 2012 is still in effect despite extensive negotiations between USDA and SFDA technical experts that have taken place in the past two years.

Current Saudi measures that restrain agricultural trade with the U.S.

In general, U.S. agricultural and food products exports to Saudi Arabia enjoy good market access with the exception of some SPS issues such as a temporary ban on poultry products from some U.S. states, ban on U.S. beef exports and stringent requirements for poultry meat exports. In addition to these SPS measures, Saudi Arabia bans swine products and alcoholic drinks for religious reasons.

1. Temporary Ban on Poultry Products Imports from several U.S. States:

For the past several months, the SFDA has imposed temporary import bans on U.S. poultry and egg products from U.S. states that confirmed the presence of highly pathogenic avian influenza (HPAI) in their poultry farms. The states affected by the ban include Montana, North Dakota, South Dakota, Wisconsin, Iowa, Oregon, California, Washington State, Idaho, Minnesota, Missouri, Kansas, Arkansas and Nebraska. The temporary ban imposed on the individual state is effective until these states are officially declared free from HPAI. The SFDA's temporary bans exclude poultry and products that are thermally treated and certified by a competent authority (FSIS) to be free from HPAI. The FSIS Export Library for Saudi Arabia lists the names of U.S. states that are ineligible for exporting uncooked poultry and their products to Saudi Arabia because of the outbreak of HPAI.

In June 2015, a delegation of USDA/APHIS visited the SFDA office in Riyadh to provide an update on the HPAI situation that affected several U.S. States. The delegation discussed risk mitigations and control measures that the USDA has put in place to limit the impact of HPAI infected states on their

poultry exports. The delegation requested SFDA to limit the poultry import bans only to the counties that have been affected by cases of the HPAI, instead of the state-wide bans it has imposed. SFDA promised to consider APHIS' request for limiting the import bans to a county level, as the HPAI inflection in the U.S. slowed down and several of the impacted states/counties have already been cleared for export.

2. Animal Protein Free Poultry Feeding

The SFDA regulations for poultry meat production require that health certificate accompanying shipments of poultry meat must clearly indicate that the birds slaughtered had not been fed with animal protein, animal fats, or any animal byproducts. In order for FSIS to issue the required animal protein free certification, U.S. exports of poultry and poultry products to the Kingdom should come from slaughter facilities that participate in the Agricultural Marketing Service's (AMS) Animal Protein Free Verification (APFV) Program for Poultry. Information about this program can be found at [AMS' Website](#).

3. Saudi Import Ban on U.S. Beef:

SFDA imports ban imposed on U.S. beef in May 2012, following the discovery of BSE case in a dairy cow in California, is still in effect. Although major progress has been made in recent months as a result of discussions between U.S. and Saudi technical experts, a few obstacles remain towards the final lifting of the import ban on U.S. beef. These remaining issues include SFDA requirements that animal feed used for feeding the cattle should be certified that it does not contain protein from animal origin as well as SFDA's proposal to limit U.S. beef and beef products from cattle with age less than 30 months.

4) Halal Requirements

For religious reasons, Saudi Arabia bans imports of alcoholic beverages, biotech animal products, live swine, pork and food ingredients or additives that contain pork products, including pork fat, rennet and gelatin. Meat and poultry shipments must be accompanied by a "Halal" slaughter certificate issued by an Islamic center in the country of origin.

SECTION II. FOOD ADDITIVE REGULATIONS

Saudi Arabia and the other GCC countries have established the following major GSO-wide standards that regulate additives used in foodstuffs. Each standard contains a positive additive list.

- An eight-page GSO Standard No. 23/1998 entitled "Coloring Matter Used in Food Stuff." This standard is concerned with natural and synthetic coloring matter added to foodstuffs prepared for human consumption. In 2010, Saudi Arabia banned the use of Red 2G in foodstuffs. Note that SFDA and GSO have removed E128 from allowable coloring matters used. As such, E128 is not allowed for use as a coloring matter in foodstuffs.
- Preservatives Permitted for Use in Food Products per Gulf Standard No. 356/1994
 - Scope and Field of Application: This standard is concerned with preservatives permitted

for use in food products. Preservatives are defined as any additives which inhibit, or arrest decomposition of foodstuffs by micro-organism.

- No preservatives other than those listed in the standard shall be used in food products. Use of sulfite compounds is not permitted in fresh vegetables and fruits.
- GSO standard number 381, defines Emulsifiers, Stabilizers and Thickeners Permitted for use in Food Products as follows:
 - Emulsifiers: Substances which, when added to a foodstuff, aid the formation of uniform dispersion of two or more immiscible substances.
 - Stabilizers: Substances which, when added to a foodstuff, aid the maintenance of a uniform dispersion of two or more immiscible substances.
 - Thickeners: Substances which, when added to a foodstuff, increase its viscosity.

SECTION III. PESTICIDE AND OTHER CONTAMINANTS

Saudi Arabia and other members of the GSO countries have developed positive pesticide and other contaminants lists. Per SFDA the lists have international context as they were mainly adapted from CODEX Alimentarius standards. The following are the major GSO standards enforced in the Kingdom:

- Gulf Standard No. 382/1994 “Maximum Limits for Pesticide Residues in Agricultural Food Products-Part 1” established the maximum limits for ten pesticide residues in foods and agricultural commodities or animal feed: Malathion, Bromophos, Diquat, Fenclorfos, Pyrethrins, Quintozene, Parathion, Orthophenyl Phenol, Methidathion and Fentin.
- Gulf Standard No. 422/1994 “Maximum Limits for Pesticide Residues in Agricultural Food Products-Part 2” establishes the maximum limits for nine pesticide residues in agricultural and food products intended for human consumption. The residues are: dimethoate, chlorfenvinphos, crufomate, diazinon, dioxathion, diphenyl, diphenylamine, ethoxyquin and folpet.
- Gulf Standard No. 357/1994 “Antioxidants Permitted for use in Foodstuffs” lists antioxidants and antioxidants synergists permitted for use in food products. Refer to appendix II for permitted antioxidants.
- Gulf Standard No. 841/1997 regulates the maximum limits aflatoxins permitted in foods and animal feeds.
- Gulf Standard No. 988/1998 is concerned with limits of radioactivity levels (gemma rays, cesium 134, 137) permitted in foodstuffs, drinking water and animal feeding stuffs.
- Gulf Standard No. 382/1994 “Maximum Limits for Pesticide Residues in Agricultural Food

Products-Part 1”.

Requirements:

Pesticide residue limits in or on food, agricultural commodities or animal feeds shall not exceed the limits specified on Tables (1-10) of the GSO 382/1994.

1) Approved Procedures in Dealing with Pesticide Residues Limits in Foodstuffs Imports

In October 31, 2011, the SFDA announced the following procedures for dealing with pesticide residues in food products (SFDA Guidance No. 3965):

- All Saudi and GCC standards concerning MRLs shall be met. If a pesticide MRL does not exist, a reference shall be made to the Codex Alimentarius Standards.
- If a pesticide MRL is not indicated either in the Saudi or GCC standards or the Codex standards, a reference shall be made to the EU or USA standards, whichever is less.
- If a pesticide MRL is not incorporated in all of the above standards, the maximum level to be adopted is 0.01 mg/kg.

2) Mandatory Compliance with Pesticide MRLs in Food Products

In January 14, 2013, SFDA issued a circular No. 1418 legislate mandatory compliance with the pesticide MRLs in food products according to the following requirements:

- It is mandatory to fully comply with the terms and procedures stated in SFDA Guidance No. 3965 issued in October 30, 2011 “Approved Procedures for Dealing with Pesticide Residue Limits in Foodstuffs imported to Saudi Arabia.
- In order to speed up the clearance process, food importers are recommended to accompany each shipment with test results, from laboratories which are internationally accredited and certified with ISO 17025, confirming its compliance with the limits stated above in Article 1.

In 2014, SFDA rejected several containers of grape leaves allegedly for containing levels of pesticide residue higher than the maximum allowable level of 0.01 mg/kg, which disqualified several U.S. shipments of grape leaves from entering the Saudi market. Most of the U.S. brands of grape leaves are now back in the Saudi market, and reportedly meet the SFDA’s maximum pesticide residue level of 0.01 mg/kg.

Ochratoxin Level in Food Products:

In the absence of SFDA or Gulf Standardizations Organization (GSO) regulations, Saudi Arabia applies regulations from exporting countries or internationally recognized bodies such as Codex Alimentarius,

EU or FDA regulations to determine the safety of imported food products and their fitness for human consumption. For instance, SFDA does not have a specification or regulation that limits Ochratoxin level in food products. In 2014, the authority rejected several shipments of U.S. Paprika sauce by implementing an EU regulation that limits the Ochratoxin level in food products to 15 microgram per kg. The SFDA has opted to implement EU standard, since the U.S. (exporting country) does not have any standard for Ochratoxin levels in Paprika sauces. This SFDA's requirement has disqualified U.S. shipments of paprika sauce worth \$2 million from entering the Saudi market for failing to meet the EU maximum limit of 15 microgram per kg for paprika sauce.

SECTION IV. PACKAGING AND CONTAINER REQUIREMENTS

GSO 839/1997 entitled Food Packages-part 1-General Requirements. This standard is concerned with the general requirements for all packages of food materials, including metal, glass, plastic, paper, carton, multilayered textile, and wood packages, in addition to any other materials for packaging foodstuffs. The main requirements are listed below:

- All packaging materials used in fabricating, forming, or treating packages shall be of food grade for contact with foods and in compliance with relevant Saudi standards.
- They shall be clean and in a condition that does not allow any contamination probabilities of the contained material.
- They shall maintain the properties of the packaged material and protect it from gaining undesirable odors, flavors and tastes.
- They shall offer protection to the product against contamination with microorganisms, insect, rodents, and dirt in the cases of products that requires it.
- They shall be impermeable to moisture in the cases of food products that require it.
- They shall offer necessary protection against environmental conditions and mechanical hazards such as impacts, vibration, static stresses, and they shall be in an intact appearance during handling.
- They shall not affect the container as a result of migration of some of their constituents that may react or be mixed with the food materials.
- It shall not be in a pharmaceutical shape.

GSO 1863/2013 entitled Food packages - Part 2: deal with general –Plastic Package requirements and specifications for plastic packages used for packaging food materials. The regulations require limits among other things that the concentration of a vinyl chloride monomer not to exceed 1 mg per kg of the plastic material, or 0.01 mg per kg of the packaged food material if the packages are made of polyvinyl chloride (PVC).

Per the standard, the following labeling information should be written on labels of plastic packages used to package foodstuffs:

1. Type of plastic material
2. Weight, capacity, number, or dimensions based on the type of packages
3. Statement of food grade
4. Purpose and type of application
5. Directions for usage
6. Warnings if applicable

Saudi Standard number SASO 2173/2003 Food Packages Made of Aluminum Foil: This standard deals with the general requirements for food packages made of aluminum foil. Below are the main requirements specified in SASO 2173:

1. Purity of aluminum metal shall not be less than 99% aluminum.
2. Each package shall be made of one piece of aluminum foil without any connection and free from holes and scratches.
3. Shall be made from foil with regular thickness not exceeding 200 micrometer according to the agreement between the user and manufacturer of these packages regarding the strength with relation to the nature of application.
4. In case of aluminum foil coated with protection layer, the coating material shall not transfer any health hazard material to the food product or to impart the odor or flavor of the food material.
5. Shall be impermeable to the water, odors and gases.
6. Shall be impermeable to the light to protect fatty foods from light.
7. Shall provide enough protection to the food product from losing or gaining heat.

SECTION V. LABELING REQUIREMENTS

a) General Requirements

As a member of GCC countries, Saudi Arabia has implemented Gulf standards GSO 9/2013. All imported and locally produced prepackaged food products must meet labeling requirements as indicated in GSO 9/2013. According to this GCC-wide standard, prepackaged food product labels should be in Arabic or include an Arabic language translation of the label. Labels must contain at a minimum: product name, packer's name, country of origin or manufacture, listing of ingredients, instructions where applicable, for the end use of the product, and the shelf-life of the product.

b) Shelf Life

In 2013, the GSO updated GSO 150/2007 "Expiration Period for Food Products" and issued in two

parts:

- GSO 150-1-2013 “Expiration Dates for Food Products -Part 1: Mandatory Expiration Dates”. The standard mandates specified mandatory expiration periods for perishable foods such as fresh or chilled meat and poultry; fresh milk and fresh milk based products; margarine; fresh fruit juice; table eggs, and baby foods.
- GSO 150-2-2013 “Expiration Dates for Food Products -Part 2: Voluntary Expiration Dates” lists suggested expiry periods for nonperishable food products but allows manufacturers to determine science based use-by dates.

Shelf life can only be shown by clear and unambiguous production and expiration dates. The use of any of the following statements for expressing expiration date is permissible.

- Expiration Date
- Use by (date)
- Fit for (from the day of production)
- Use Before (date)
- Sell by date (for food products having an expiration period exceeding 3 months).

The production and expiration dates should be declared on the label of the package in uncoded manner as follows:

- Day-Month-Year: for foodstuffs with an expiration period less than three months.
- Month-Year: for foodstuffs with expiration exceeding three months.

Dates shall be engraved or in relief, printed to stamp with permanent ink directly on all packages or on their original label by the producer only. Adding stickers for production and expiration dates is not permissible. There shall be not more than one date of production or of expiration on the same package. Both dates shall not be subject to deletion, change or deceit.

Products with No Specific Expiration Date: Products with no specified shelf life such as salt, spices, milled rice, etc. only the date of production or processing would be shown as: mm/yy.

We recommend that when putting together an order for a Saudi importer, a U.S. exporter should cross check information contained on his/her food label, including Production/Expiration dates, with the Saudi buyer.

c) Requirements for Nutritional Labeling

The SFDA enforces the GCC regulations regarding mandatory disclosure of nutritional information on labels of imported as well as locally produced prepackaged food products.

The GSO regulation number 2233 which was issued in 2012 requires mandatory disclosure of nutritional information such as the amount of calories, carbohydrates, proteins, fats and other components that may affect the product’s nutritional value or consumers’ health or safety.

The SFDA requires that food products importers and domestic producers to strictly follow pertinent regulations such as the GSO 9/2013 “Labeling of Prepackaged Food Products and GSO 2233/2012 “Requirements of Nutritional Labeling when disclosing the required nutritional information.

d) Rejection of Misleading Health Benefit Statements on Food Labels

In early 2015, the SFDA started to strictly implement its 2011 regulation that bans “misleading health benefits claims” on labels of prepackaged food products, resulting in Customs clearance refusal of several shipments of U.S. breakfast cereal containing health claims such as “May help to reduce cholesterol”. The SFDA said that these nutritional or health benefit claims are unverifiable, thus misleading for consumers. Similarly, product packages containing the logo of the American Heart Association have been refused Customs clearance for similar reasons. SFDA also bans imports of prepackaged food products containing alcoholic connotations such as “cocoa liqueur” as an ingredient. This requirement has practically prevented the imports of some high qualities U.S. chocolate products.

The SFDA indicated that its decision to ban “misleading health benefits claims” is based on the following three articles of the GSO 9/2007 “Labeling of prepackaged food stuffs “

- Article 7/1/5: legally or forbidden names, symbols, marks or photos shall not be used.
- Article 8/1: information written on the label of food products shall not contain any statements having drug or treatment characteristics.
- Article 4/2: any foodstuff shall not be described or offered for sale with any label which may be deceptive, misleading or false or is likely to create an erroneous impression regarding its nature or characteristics in any aspect.

Accordingly, SFDA will not allow Customs clearance of prepackaged food products with following statements on their labels:

Table I. Claims Referring to Reduction of Diseases Risk

	Food Product	Claim
1	Supplement containing berry-blend	<ul style="list-style-type: none"> • Reduces blood cholesterol levels. • Reduces the risk of cardiovascular diseases.
2	Supplement containing cranberry extract	<ul style="list-style-type: none"> • Eliminates the adhesion of harmful bacteria to the bladder wall. • For a healthy urinary tract
3	Lycopene-whey complex	<ul style="list-style-type: none"> • Prevents oxidation of lipoproteins in blood. • Reduces the risk of heart disease.
4	Mix of prebiotics	<ul style="list-style-type: none"> • Regular consumption of prebiotics helps to protect against the bad bacteria in the intestines.
5	Product containing dehydrated leaves of the prickly pear cactus (<i>Opuntia ficus-indica</i>)	<ul style="list-style-type: none"> • Helps to improve blood lipid parameters and HDL-cholesterol.
6	Lactobacillus helveticus fermented low-fat milk products	<ul style="list-style-type: none"> • Reduce the risk of arterial stiffness and heart diseases.
7	Sparkling or mineral water	<ul style="list-style-type: none"> • The regular consumption of mineral water reduces body hyperglycemic levels.
8	Green Tea	<ul style="list-style-type: none"> • Beneficial for diabetics • Reduces the risk of developing cancer • Reduces the risk of stroke. • Slows down aging signs • Prevents tooth decay • Contains flavonoids which help detoxify your body. • Protects you from Irritable Bowel Syndrome (IBS) • Boosts the immune system. • Dissolves cholesterol and increases vitality • Helps to maintain a perfect body weight • Healthy

Table II-1. Claims Referring to Children’s Development and Health-continued

	Food Product	Claim
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1	Mixture of the n-3 polyunsaturated fatty acids (PUFAs) [eicosapentaenoic acid (EPA) and docosahexaenoic acid (DHA)] and the n-6 PUFA gamma-linolenic acid (GLA)	<ul style="list-style-type: none"> • Provides the nourishments that support healthy central nervous system development. • Provides the nourishments that help children to maintain healthy brain functions. • Provides the nourishments that help children to maintain concentration levels. • May help maintain coordination. • May help maintain concentration. • May help supporting the development of brain functions and maintaining such functions. • May help maintain learning ability. • May help support the development of eyes functions and maintaining such functions.
2	Mixture of the polyunsaturated fatty acids [Docosahexenoic Acid (DHA) and Arachidonic Acid (ARA)]	<ul style="list-style-type: none"> • DHA & ARA support neural development of the brain and eyes.
3	Dairy products (milk, cheese and yoghurt)	<ul style="list-style-type: none"> • Help promote a healthy body weight during childhood and adolescence.
4	Dairy Products (milk and cheese)	<ul style="list-style-type: none"> • Promote dental health in children. • Stabilize calcium and help to maintain stronger bones and teeth.

Table II-2 Claims Referring to Children’s Development and Health--continued

	Food Product	Claim
5	Food supplement containing Lactobacillus plantarum, Lactobacillus rhamnosus and Bifidobacterium longum	<ul style="list-style-type: none"> • Helps maintain the normal functioning of the alimentary tract. • Improves the general immunity by maintaining the microbiological balance. • Helps protect the alimentary system against enteric pathogens because of its strong antagonistic properties. • Helps building the natural intestinal barrier. • Helps to maintain natural intestinal microflora during travel, changing the climatic zone or a diet, especially in poor hygiene conditions. • Contains living probiotic bacteria with strong ability to colonize the intestinal tract. These bacteria are isolated from naturally fed-infant.
6	Chocolate	<ul style="list-style-type: none"> • Helps you grow. • Aids digestion.
7	Follow-on formulae with a fixed combination of short-chain galacto-oligosaccharides, acidified milk, nucleotides and beta-palmitate	<ul style="list-style-type: none"> • Aids minor intestinal ailments (as colic, constipation, digestive symptoms).

Table III-1 Other Claims

	Food Product	Claim
1	Food supplement containing fish oil [Docosahexaenoic Acid (DHA) and Eicosapentaenoic Acid(EPA)]	<ul style="list-style-type: none">• Contribution to the reduction to the reduction of hot flushes resulting from the increase of temperature.
2	Immune balance Drink, containing vitamin C, green tea extract, grape skin extract, grape seed extract, and shiitake mushroom extract.	<ul style="list-style-type: none">• Boosts the immune system.
3	Lactobacillus plantarum 299v (DSM 98443)	<ul style="list-style-type: none">• Improves iron absorption.
4	Milk product, rich in fiber and protein	<ul style="list-style-type: none">• Reduces the sense of hunger
5	Mix of prebiotics	<ul style="list-style-type: none">• Helps to maintain a healthy gastrointestinal (GI) function.• Supports your natural defenses.
6	Tablets and chewing gum containing prebiotics bacteria [Lactobacillus reuteri (L. Reuteri) strains DSM 17938 and ATCC PTA 5289]	<ul style="list-style-type: none">• Helps re-balancing and improving oral health.
7	Food products containing Conjugated Linoleic Acid (CLA)	<ul style="list-style-type: none">• Helps to build and re-shape the body.
8	Food products containing cocoa extract.	<ul style="list-style-type: none">• Help to build and re-shape the body.
9	Mix of probiotics	<ul style="list-style-type: none">• Helps to reduce gastrointestinal discomfort.• Boosts the immune system.
10	Milk and dairy products enriched with milk peptide and magnesium	<ul style="list-style-type: none">• Helps to moderate signs of anxiety in mildly stress-sensitive adults due to it milk peptide and magnesium content.

Table III-2 Other Claims-continued

	Food Product	Claim
11	Black tea extracted from <i>Camellia sinensis</i>	<ul style="list-style-type: none"> • Helps to promote attentive and concentration
12	Using Docosahexaenoic Acid (DHA) as a raw material for foods/food supplements	<ul style="list-style-type: none"> • Promotes antioxidants in the cells of the human body.
13	Tea	<ul style="list-style-type: none"> • Rich natural source of flavonoids (Antioxidants). • Stimulates mental clarity. • Increase vitality. • Rich in antioxidants and thiamine which helps protecting the body. • Helps stimulating the mind and the body. • Considered one of healthiest types of tea. • Healthy.
14	Products of potassium salts and ammonium salts	<ul style="list-style-type: none"> • Used for diet. • Doesn't cause high blood pressure.
15	Coffee	<ul style="list-style-type: none"> • For mental clarity and mood-altering • Stimulates vitality
16	Peanut butter	<ul style="list-style-type: none"> • Energy, strength and smartness
17	Wheat germ	<ul style="list-style-type: none"> • Strength, agility and vitality
18	Vegetable oils and their derivatives	<ul style="list-style-type: none"> • Free of cholesterol • Healthy • Healthy heart • Picture indicating a healthy heart • Rice in omega-3 • Omega-3 protection • Provides a healthy food for your heart • Maintain a healthy heart • Helps development and growth
19	Cornflakes	<ul style="list-style-type: none"> • Help to maintain a strong body and to fight diseases • Helps transport oxygen which sustain the function of the blood cells and the body
20	Honey and its derivatives	<ul style="list-style-type: none"> • Strengthens the heart • Boosts the immune system of the body • Cures intractable wounds

		<ul style="list-style-type: none"> • Reduces blood lipids • Cures skin diseases • Cures gingivitis (inflammation of the gum tissues) • Cures cancer and fights viruses • A solution for stomach and intestine problems
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Note: SFDA has stated that it would periodically update its list of rejected “misleading health benefits claims” on the SFDA website. It pointed out that the examples of rejected health claims listed on tables I to III are not exclusive and any claim with similar meaning will be rejected and any unlisted claims should be undergo scientific review by an SFDA expert panel.

e) Requirement for two dates (production and expiration) on labels.

GSO member countries including Saudi Arabia require that labels of prepackaged foods products to include both production and expiry dates. Since most U.S. food processors do not put only use by dates, U.S. exporters interested to export to the Gulf countries and Yemen have to incur additional cost purchase a machine that is capable of printing both production and expiry dates (use by dates) in order to meet the GSO food labeling requirements.

f) Additional Labeling Requirements

In addition to requirements per GSO 9/2013, the following labeling information must be declared for food additives and antioxidants used in foodstuffs:

- For coloring matters, their mixtures, preparations and diluents used in foodstuffs, the following additional information must be declared:
 1. Common name
 2. Color index number
 3. Name of solvent or diluent
 4. Production and expiration dates in a non-coded manner (day-month-year)
 5. Dye purity
 6. The statement “Free from alcohol”
 7. The statement “Color matter for use in foodstuffs.”
- For Flavors permitted for use in Foodstuffs common name and code number (if found) must be declared on food products containers contained flavors.
- For preservatives permitted for use in food products, common name or EEC number and a statement “Preservative for Use in Food Products” in case of preservatives containers.
- For emulsifiers, stabilizers and thickeners permitted for use in foodstuffs, the following additional information must be declared:

1. Common name or EEC no.
 2. In case of gelatin, lecithin and mono and diglycerides the source shall be mentioned.
- For Sweeteners Permitted for Use in Food Products:
 1. The name of sweeteners or INS numbers
 2. Food products formulated specifically for use by diabetics or for other special nutritional uses shall contain the statement “Food for special dietary use or food for diabetic.”
 3. The amount of sweeteners matter, mg/liter or kg in case of using combination of sweeteners, the amount of each in combination shall be declared.

The following warning must be declared:

4. In case of aspartame, “Not to be used by persons who have phenyl ketonuria.”
 5. In case of saccharine, “Use of this product may be hazardous to your health because it contains saccharin which has been determined to cause cancer in laboratory animals.”
 6. In the case of sugar alcohol "Excess of consumed quantity may cause diarrhea.”
- The following additional labeling information must be declared for antioxidants permitted for use in foodstuffs:
 1. Common name or EEC number
 2. A statement “Antioxidants permitted for use in foodstuffs” in case of antioxidant containers.

g) Labeling Requirements for Prepackaged Foods for Special Dietary Uses

Definition of Dietary Foods: GSO number 654/1996 defines dietary foods as food products specially prepared or formulated to satisfy particular dietary requirements which exist because of a particular physical or physiological conditions and/or specific diseases and disorders. These foodstuffs differ significantly in composition from the ordinary products of comparable nature, if such ordinary foods exist. The following requirements shall be met in prepackaged foods for special dietary uses:

- The product shall be completely free from pork products or their derivatives.
- It shall be registered by the Saudi Ministry of Health (MOH). Note that infant formulas and baby foods such as Similac, ready-made soft and wet foods, breakfast cereals, dry finger foods including biscuits, snacks are not considered foods for special dietary uses and there are registration requirements for them. All imported baby foods and formulas are inspected by SFDA at Saudi ports of entry and must comply with pertinent GSO or Saudi quality regulations and standards.

- It shall not be pharmaceutically packaged in a way suggesting that it is a drug.
- It shall be offered for sale in places separated from the ordinary foods in supermarkets. Foods for special dietary uses for infants and children shall be dispensed only by pharmacies, hospitals and children care centers.
- Artificial sweeteners are not permitted to be used in all baby and infant foods.

In addition to the general labeling requirements as stated in GSO 9/2013, further information must be declared for prepackaged foods for special dietary use per the following GSO Standards:

- GSO 654:1996: this standard is concerned with the general requirements for prepackaged foods for special dietary uses. It includes foods for infants and children sold only in pharmacies. It does not apply to foods sold supermarkets and other retailers.
- GSO 2233:2012: this regulation states the procedures for the nutrition labelling of foods. 1/2 This regulation applies to the nutrition labelling of all prepackaged food products except for raw products such as fresh fruits, vegetables, meat and fish.
- GSO 2392:2014: this GSO standard applied to refined iodized soft edible salt in the proportion of low-sodium prepared for human consumption.
- GSO CAC / GL 10:2009: this standard contains advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young children.

h) Food Allergens Labeling

In October 29, 2011, the SFDA issued a circular requiring the declaration of allergenic ingredients and their derived contents or extract in food products in order to inform consumers who are allergic to some food ingredients. The SFDA requires the following declared on the label of prepackaged food products:

- As per article 5/2/4 and 5/27 of Saudi Standard No 1/2007, the label should indicate the raw materials used in the processing of food products and their allergenic ingredients such as cereals (wheat, barley, oat and rye) containing gelatin whether natural or halogenated and their products (such as bread, rusk and cake) crustaceous and their products (such as shrimps, crabs, lobsters and oysters) eggs and their products (such as pies, cakes, biscuits, custards, and noodles), fish and their products, nuts, peanuts soybeans, walnuts and their products (such as peanut butter, sauces and creams), milk and their products because of their protein contents (such as yogurt, cheese, chocolate, creams, pudding, milk sauce, and custard), sulphites when added at a concentration of less than 10 ppm (example: raisin, dried fruit and beverages).
- If a product is obtained by means of biotechnology, it must be clearly stated on the label. This technology causes allergens to be carried over to the products mentioned in article 1.

i. Biotech Labeling General

On April 12, 2011, the GSO issued two mandatory agricultural biotechnology regulations, the GSO 2141/2011 (General Requirements for Genetically Modified Unprocessed Agricultural Products) and the GSO 2142/2011 (General Requirements for Genetically Modified Processed Agricultural Products). The GSO 2141/2011 deals with the general requirements for genetically modified unprocessed agricultural products, while the GSO 2142/2011 specifies the general requirements for genetically modified processed food and feed products. The two technical regulations require positive biotech labeling if unprocessed agricultural products, processed food product, feed products or seeds contains more than one percent of GE ingredients.

Saudi Arabia, which was the GCC lead country in preparing the draft standards for the two GSO biotech regulations, became the first GSO member country to implement these regulations effective in October 2011. With more than a decade of experience implementing similar regulations for dealing with both processed food and feed products, it was relatively easy for Saudi Arabia to implement the GSO technical GE regulations. These technical regulations replaced the old Saudi agricultural biotech labeling decrees by increasing the biotech threshold level from 0.9 percent to one percent and rescinded the ban on imports of biotech planting seeds according to specifications outlined in GSO 2141/2011. However, no biotech planting seeds have been imported thus far into Saudi Arabia. Similar to the Saudi biotech regulations, the GSO 2141/2011 prohibits the importation of any genetically modified animals, birds, fish and their products. Below is a summary of the GSO biotech labeling requirements:

ii. Positive labeling

If a product contains one or more GE plant ingredients with more than one percent GE content, the words (genetically modified) or (produced from genetically modified, name of the ingredients) shall appear clearly and easily to read in parentheses immediately following the ingredient(s) concerned, with same font size and different color. The GSO biotech regulations do not allow imports of foodstuffs that contain GE animal products. According to the SFDA, local food producers must also abide by the biotech labeling requirements.

iii. Bilingual labeling

Labeling and adjoining explanatory statements shall be in Arabic and, where another language is used, it shall be alongside the Arabic. All information that is provided in another language shall be identical with those written in Arabic. The biotech statement must be clearly written in easy to read font upper case in both Arabic and English languages with different color from that of the main product label.

If the GE food product is different from its conventional counterpart, the labeling shall mention any characteristic or property concerning the following:

- Composition
- Mode of storage and packing
- Nutritional value or nutritional effects.
- Intended use of product.
- Any implication on certain group of people, or certain animals or the environment.

- Physical characteristic (color, taste, odor, and the touch).
- Methods for the safe handling, storage, transport and use.

If the food product does not have a conventional counterpart, the labeling shall contain appropriate information about the nature and characteristics of the food product concerned.

If the mode of storage, preparation or cooking of the product is no longer equivalent to or differs significantly from the corresponding conventional food, a clear instructions as to how to use must be given on the label of the product.

iv. Health certificate

Biotech agricultural products exported to Saudi Arabia and GCC countries must have been approved in the country of origin for human or animal consumption or planting seeds and meets all relevant Saudi and GSO approved regulations and standards requirements. Each shipment must be accompanied by an official health certificate issued by competent government agency stating that the GE ingredient(s) used in the foodstuff, grains or seed exported is/are approved in the country of origin for human or animal consumption or for planting seeds. SFDA accepts health certificates issued by FDA, federal or state departments of agriculture for high value and processed feed products. Health certificates issued by exporting companies or other private organizations, including notary public statements are not recognized.

For U.S. biotech feed grains, MOA still accepts the one-time biotech grains certification statement that was provided in 2003 by the USDA's Grain Inspection, Packers and Stockyards Administration (GIPSA). The statement certified that the exported transgenic feed grains and oilseeds (corn and soybean, and soybean meal) are the same as those consumed in the United States. The approved statement eliminates the need for a shipment-by-shipment positive biotech certification for unprocessed agricultural products that is required in section 4.1.5. of the GSO 2141/2011.

v. Real Time Polymerase Chain Reaction (PCR) Method

Saudi Arabia implements PCR Real Time Method for GE testing. Samples for laboratory analysis are taken according to GSO ISO standards numbers 21098, 21569, 21570, 21571, 21572 and 24276.

SECTION VI. OTHER SPECIFIC STANDARDS

1) Novel Foods

Prior to the importation of a novel food item to Saudi Arabia, the following documents must be presented:

- Reliable scientific evidence authenticated by recognized official bodies to confirm the safety of the food for human consumption including: Acceptable Daily Intake (ADI), possible warnings in case of intake by a high risk population and also warnings if a food ingredient has exceeded its Recommended Daily Allowance (RDA).

- Reliable information on the criteria for the method of use has been based.
- Ingredient analysis results from accredited labs confirming that the product is fit for human consumption and free from any health hazards.
- A Free Sale Certificate testifying that the product with its components and ingredients is freely sold in one of the countries which apply Codex standards or EU legislations.
- A pledge of full responsibility towards the product after its entry to the market and commitment to follow any relevant circulars, standards or regulations that SFDA officially publishes in the future.

2) **Baby Foods**

There are GSO standards that establish quality specification for baby foods GSO 355/2011 and GSO 354/1994.

- The GSO 355/2011 titled “Canned Baby Foods” specifies baby foods which are intended primarily for use during the normal infant's weaning period (from 6 months), and also for the progressive adaptation of infants and children to ordinary food. They may be either in ready-to-eat form or in dry form requiring reconstitution with water only.
- GSO 354/1994 Infant foods based on milk: This standard is concerned with infant foods based on milk in liquid or powdered form intended for use as substitutes for human milk

3) **Requirements for Government Subsidized Baby Food**

Breast Milk Substitutes (BMS) or infant formulas: in addition to the general requirements specified in established GSO standards, they must meet the following specifications:

- Age group: from birth until three years of age
- The percentage of milk protein: (11%)
- Percentage of milk fat: (8%)
- No flavor, only plain.

4) **Animal Quarantine Regulations**

Over the years, Saudi Arabia has banned cattle, meat and meat products imports for health reasons. Cattle imports from countries affected by Mad Cow disease, or Bovine Spongiform Encephalopathy (BSE), Foot and Mouth, and Cattle Plaque diseases are banned until the affected countries are declared free of the diseases by OIE. Cattle imports from countries not affected by the diseases are subjected to strict quarantine regulations on arrival at Saudi ports of entry. Saudi Arabia also bans meat and meat derivatives from countries affected by BSE and other cattle diseases. It also bans transshipment of livestock meat through countries banned from exporting meat and meat products because of BSE, FMD and other animal diseases. In addition it requested additional statements on the health certificate accompanying livestock and poultry meat shipment to indicate that the animals slaughtered for export to

the Kingdom were not fed animal protein, fats and other animal ruminants and were not treated with growth hormones. Imports of live poultry, poultry meat and hatching eggs are banned from countries affected by bird flu. Imports of live poultry are also banned from countries with the West Nile Virus epidemic.

SECTION VII. FACILITY AND PRODUCT REGISTRATION REQUIREMENTS

A. Registration of Foreign Establishments Exporting Food Products to Saudi Arabia

SFDA has begun voluntary registration of foreign establishments that export food and feed products to Saudi Arabia with is no deadline for the registration. The registration process consists of nine steps for all types of establishments with the exception of slaughter houses that may require SFDA site inspections and approval as additional registration conditions. In any case, foreign establishments must first create their individual electronic account (E-Account) with SFDA by logging to <http://frcs.sfda.gov.sa/Account/RegisterAccount.aspx> and completing the electronic form. Once the form is completed, the system will send an activation code to the registered company's email address. After receiving the activation code, the firm can choose one of the two options to active its E-Account: by clicking on the link sent in the SFDA's e-mail or by opening this link: <http://frcs.sfda.gov.sa/Login>

Once the E-Account is created, the following steps are needed to register a foreign establishment:

1. Establishment Information

- Name, both in Arabic and English, including establishment's short name and approval number.
- Address and contact information.
- Authorized persons: full names in Arabic and English, responsibilities and contact information.

2. Headquarter address and contact information

3. Official inspectors or competent authority name, address and contact information.

4. **Business Activities:** primary products, manufacturing, wholesales, storage, transportation, retailers, food service, manufacturers selling mainly direct to final consumer, slaughter house.

5. **Production Information:** production capacity, actual production, percentage of products sold in the local market and percentage of exported.

6. **Food Safety & Hygiene Control System:** upload available certificates such as ISO 9001, ISO 22000, and HACCP.

7. **Specific Requirements:** upload documents into the system to satisfy the following requirements.

- Production of foods in line with Islamic Halal requirements (specify)
- The animal slaughtered meets GSO slaughter requirements as specified in GSO Slaughter Procedures standard number GSO 993/1998
- Specify disposable TSE risk material
- Islamic Organizations that attest Halal slaughtering procedures

8. **Supporting Documents:** upload any additional supporting documents that are not list by SFDA

9. Declaration (Ratification) and Submission

It should be note that SFDA may decide to inspect foreign slaughterhouses, meat, poultry, fish and their products processing facilities to register and qualify them to export the products to Saudi Arabia.

B) Food Products and Animal Feed Registration

In January 2014, the SFDA implemented a mandatory electronic customs clearance system (E-Clearance) for all food and processed feed products imported into the Kingdom. The mandatory E-Clearance covers all food imports, including packaged, raw materials for food processing industry and processed animal feed. The SFDA does not process any requests for Customs clearance of imported food and processed feed products unless it is submitted through the E-Clearance system. To qualify for the E-Clearance, all food and feed products importers as well as their Customs brokers should create their individual E-Account with SFDA and complete the online registration process for all imported food and feed products.

- **Imported Food Products**

The registration of imported food products is the responsibility of the local importers or agents. Each importer or agent is required to open an E-Account and set up individual user name and password at SFDA's Executive Department for Imported Food Control (EDIFC) E-Services at <https://frcs.sfda.gov.sa/Login.aspx>. Once the E-Account is created, importers can upload their food products information including harmonized code (HS Code), bar code, item code, and listed ingredients in English and Arabic, picture of each product as well as copy of the product label. The food products label must contain all information required by the Gulf Standard Organization regulation number GSO 9/2013 "Labeling of Prepackaged Food Stuffs". Importer are also required to register coordinates of their warehouses, names of authorized contact persons to deal with SFDA, including Customs brokers contracted in each Saudi port of entry. Individual importers are required to register all food products they intend to import, even if some or all of the products they intend to import have been already registered by another importer. The electronic registration with the SFDA is free of charge and there is no expiry date for the registration. Importers, however, are required to re-register their products when there are changes in products formulations or labels. The registration process seems to be simple and can be quickly completed if needed information is readily available and required documents are uploaded. It is important to know that SFDA does not allow the importation of food products that are not registered on its E-Account database.

- **Animal Feed National Registry (AFNR)**

The SFDA's Executive Department for Animal Feed uses an electronic Animal Feed National Registry (AFNR) system for registering and licensing local feed importers and producers. Each domestic feed importer and producer must open individual E-Account with AFNR and register all imported feed materials including raw feed, compound feeds and non-medicated feed additives in order to obtain import license and Customs clear the products electronically on arrival at Saudi ports of entry. SFDA allows foreign feed producers to voluntarily register with AFNR their facilities and feed products they intend to export to Saudi Arabia. Below is the link to the SFDA's National Feed Registration System: <http://afnr.sfda.gov.sa/Account/RegisterAccount.aspx>

B. Herbal Preparations Registration

Herbal preparations, health and supplementary foods must be registered with the General Directorate of Medical and Pharmaceutical Licenses of the MOH in order to be marketed in the Kingdom. The registration is done through a local agent by submitting sample products and product brochures, which are studied and tested by the ministry's central laboratory. It takes about six months for the ministry to approve and license a product. The ministry charges about \$300 as a registration fee.

Exporter need to submit the following documents through their local agent to the MOH in order to initiate the product registration and licensing process:

1. Table of contents
2. An Authenticated copy of the agency registration certificate at the Saudi Ministry of Commerce and Industry.
3. When registering for herbal products, a copy of pharmaceutical wholesale license should be submitted by the local agent.
4. Certificate (s) issued by the health authorities in the country of origin clearly stating that the following should be provided:
 - The company is licensed to manufacture the products in the country of origin (state license number and date).
 - The company is permitted to sell the product in the country of origin (certificate of free sale)
 - The company follows good manufacturing practice.
 - Coloring agents, diluents and other incorporate substances in the product formula are permitted in the country of origin (if the free sale certificate states such information it will be sufficient).
 - Package insert and applicable information stated on the pack are the same as that approved and currently marketed in the country of origin. Package insert shall be in Arabic and English languages. The company is obliged to add and/or delete any

information required for handling the product in the Kingdom as determined by the registration committee.

5. A certificate issued by the company and authenticated by the relevant authorities in the country of origin clearly stating the following information about the product:

- Registration number and date and date of marketing in the country of origin.
- Trade and/or generic name.
- Full composition (the scientific name of active and inactive ingredients and their quantities)
- Therapeutic category (if any).
- The composition of product to be exported to the kingdom is the same as that market in the country of origin.
- Names of countries where the product is currently marketed.
- A certificate of analysis indicating the results of completed analyses for the submitted samples.
- If the product contains ingredients of animal source the kind of animal must be specified.
- Percentage of alcohol in the finished product, if present, should be indicated with justification of that percentage.

6. Full specifications and methods of analyses of the finished product, as well as stability study and data including storage conditions.

7. Six samples of the product as well as samples of the outer package and product's label.

8. Abstracts of scientific references brochures and international scientific periodicals testifying to the efficacy and safety of the product.

SECTION VIII. OTHER CERTIFICATION AND TESTING REQUIREMENTS

A. General Standards for Food Products Imports

SFDA strictly applies GSO regulations and standards on imported foods products. If GSO regulations and standards are not available, it applies its own issued regulations and standards. In the absence of Gulf and Saudi issued regulations and standards, SFDA applies Codex or supplying countries standards such as FDA, EU and other developed countries standards. The table below lists the main GSO and Saudi standards that all U.S. food products exporters should take into consideration when considering exporting to Saudi Arabia.

U.S. exporters are encouraged to consult closely with their Saudi importers on detailed product requirements prior to shipment.

Standard Title	Standard No
Conditions of storage facilities for dry and canned foodstuffs	GSO 168
The maximum limits for antioxidants permitted for use in food products	GSO 1059
Maximum limits for pesticide residues in agriculture food products part 2	GSO 383
The two pieces aluminum round cans used for canning food, Beverages & stuff	GSO 1793
Round, metal, installation, used for canning stuffs : determinations, dimensions and capacities	GSO 1797
Edible casein and caseinates	GSO 1374
Sweeteners permitted for use in food	SASO 1548
Emulsifiers, stabilizers and thickeners permitted for use in food stuffs	GSO 381
Flavoring permitted for use in food stuffs	GSO 707
Preservatives permitted for use in food products	GSO 356
Permitted food additives in edible oils and fats	GSO 19
Coloring matter used in food stuffs	GSO 23
Salts of sulpharous acid used in preservation of food stuffs	GSO 175
Labeling of prepackaged food stuffs	GSO 9
Limits of radioactivity levels permitted in foods stuff part -1	GSO 988
Benzoic acid, sodium ,benzoate ,and potassium benzoate used in preservation of food stuffs	GSO 172
Refrigerated cabinets for the sale and/or display of food products, part 1: general requirement	GSO 1686
Code of practice for the prevention and reduction of lead contamination in foods	GSO CAC RCP56
Food packages - part1 : general requirements	GSO 839
Food packages - Part 2: Plastic package - General requirements	GSO 1863
Food packages made of aluminum foil	SASO-2173
Expiration periods of food products	GSO 150
Principles for food import and export inspection and certification	GSO CAC/GL 20
Antioxidants permitted for use in food products	GSO 357

The above standards are copyrighted documents and can be purchased by logging into GSO webpage:

<http://www.gso.org.sa/standards/public/standardsList.seam>

<http://www.saso.gov.sa/en/eservices/Pages/standardSearch.aspx> (for SASO standards)

B) Certificate of Animal Slaughtering Requirements According To Islamic Law

Poultry and livestock slaughtering has to take place in an officially licensed slaughterhouse and in accordance with Islamic slaughtering procedures in GSO number 993/1998 “Animal slaughtering Requirements According to Islamic Law”. Per the standard, a Certificate of Islamic Slaughter must be issued for all meat and poultry products entering the Kingdom of Saudi Arabia and the GCC countries. This certificate is issued by Islamic institutions recognized by Saudi Embassy or Consulates in the United States. Information related to the approved Islamic institutions may be obtained from the Saudi Embassy in Washington or the nearest Saudi Consulate (New York, Houston, or Los Angeles). Such certificates contain language certifying Islamic slaughter. The following language was taken from a recently issued Islamic Slaughtering certificate issued in the United States:

“ This is to certify that an Islamic representative inspected the above slaughter facility. The healthy animals and/or poultry were inspected within 12 hours previous to slaughter by the United States Department of Agriculture official veterinarian. After processing, inspection was made and approved by the USDA Government Health inspector. Further, the animals and /or poultry were slaughtered under the following statement, “slaughtered and processed in the name of God, the Almighty, Most Gracious, Most Merciful, and God is Greatest.” Bismillahi Rahmani Rahim-Allahu Akbar. The animals and /or poultry covered by this certificate were slaughtered by means of a sharp knife, cutting through the skin, jugular vein, and trachea, to result in thorough bleeding of the carcass in preparation for dressing and evisceration.

B) Hazard Analysis and Critical Control Point (HACCP)

On February 9, 2003, the Saudi Ministry of Commerce and Industry issued the Ministerial decree number 2436 to all Chambers of Commerce in the country requiring the insertion of a new clause in health certificates accompanying imported meat and meat products to make sure that the abattoirs used to produce meat & meat products exported to the Kingdom implement the Hazard Analysis and Critical Control Point (HACCP) as a system of production process control.

Following is the summary of unofficial translation of a copy of the new decree number 2436:

Reference is made to the Ministerial decree number 123 of April 10, 2001 which spelled out the rules and regulations to be followed when importing all types of meat: chilled, frozen or canned beef, veal, mutton, goat meat and poultry meat and their by-products from safe origins to Saudi Arabia.

Based on the need to protect consumer safety and health, it is required to implement the HACCP regime in all abattoirs producing meat and meat products. To facilitate this, a further Ministerial decree number 2436 was issued on February 8, 2003. The decision requires the insertion of a new clause, referred to as number 13, to the general regulations and condition to be followed when meat and meat products are imported to Saudi Arabia. The text of the clause # 13 should read as follows: “The abattoir (s) implements HACCP procedures in all stages of

meat and meat”

SECTION IX. IMPORT PROCEDURES

1) Import Procedures

Below are the SFDA’s procedures for importing food products into Saudi Arabia:

- Importers must have a Commercial Register, which includes food trade
- Importers should have already created an E-Account with the SFDA and registered all their imported food products.
- Required Documents: The following documents must be submitted to the SFDA in order to commence the required product inspections process:
- Original invoice certified by a chamber of commerce where the exporting company is located.
- Some of the following certificates (according to the food item) shall be made available:
 - a. Certificate of origin (Copy)
 - b. Halal Certificate (original)
 - c. Certificate of slaughtering for meat and poultry (original)
 - d. Any other documents or certificates required by the SFDA
 - e. In addition to the general requirements listed above, there may be special requirements specified by SFDA according to the nature of imported food products.

2) Inspection Procedures at Border Inspection Posts (BIPs)

With the exception of herbal preparations, health and supplementary foods (inspected by the Ministry of Health) and live animals, plants, seeds and grains (inspected by the Ministry of Agriculture), all imported foodstuffs are inspected by the SFDA’s Executive Department of Imported Food Control (EDIFC) at Saudi ports of entry or BIPs. Imported processed feed and feed ingredients are inspected by SFDA’s Executive Department of Animal Feed (EDAF).

Imported foods are inspected independently by EDIFC’s inspectors at one of Saudi BIPs without any interference from SFDA headquarters in Riyadh. Laboratory officials pull random samples from full consignments and testing is done fairly quickly. If imported consignment is in compliance with pertinent GSO or Saudi regulations and standards it is cleared. Otherwise, it is rejected. The domestic importer has no access to SFDA internal report during the process. SFDA informs the importer its final decision whether to clear the product for sale in Saudi Arabia or reject it due to lack of compliance with established regulations and standards. Reject products have to be re-exported or

destroyed domestically under SFDA's supervision.

EDIFC inspectors perform the following mandatory a-four stage verification process when food consignments arrive at BIPs:

- **Documentary Check:** all certificates and documents accompanying a consignment are checked and presence of all required documentation is verified.
- **Identity Check:** the identities of all food items imported in the consignment are verified against information in accompanying documents.
- **Physical Examination:** all food items contained in the consignment are physically verified to ascertain conformity with the technical regulations and standards, and that the labeling requirements are met as specified by the pertinent technical regulations and standards. It also makes sure that inner temperature level of the container meets the established pertinent regulations and standards.
- **Laboratory Test:** if the food inspector has reasons to believe that a laboratory test is needed to take a final decision about the food consignment, he may take random sample and send it for analysis at authorized laboratory.

If the imported food product meets the established pertinent regulations and standards, it is released by EDIFC on the same day and referred to the Customs for final clearance. Failure to comply with pertinent regulations at any of the above stage may result in a rejection of the imported food product and prevented entry to the Saudi market.

If a product is rejected by one of BIPs inspectors for alleged lack of adherence to established specifications at any of the above four stages, the local importer has the right to appeal the decision in writing to EDIFC at the SFDA headquarters and ask for reconsideration of the inspection results. In such cases, EDIFC forwards the appeal to SFDA's special committee that studies shipment documentation and the BIPs test results to verify compliance with established rules and regulations. If the BIP action was found to be in compliance with the rules and regulations pertain to the rejected product, then EDIFC considers the BIP findings and decision as final. If, for any reason, there was a misjudgment by the BIP inspectors, EDIFC repeals the decision and inform the importer to clear the consignment from Customs. Containers can be cleared in less than five working days provided all required documents are in order and imported products meet Saudi Arabian/Gulf specifications.

3) Customs Clearance

As mentioned earlier, shipments of food products must be accompanied by a commercial invoice, health certificate, and other selected documents. It should be noted that the Saudi Customs Authority requires that commercial invoices to be issued on CIF basis (cost, insurance and freight). If products are sold on FOB (free on board) basis, the Saudi importers will have to pay for freight and insurance costs and submitted the invoices to the Saudi Customs along with commercial invoices when the consignment

arrives at the Saudi port of entry. The Saudi Customs requires the CIF information for imported food products to assess and levy import duties. Containers are normally cleared in less than ten days provided all documents are in order and imported products meet Saudi standards and specifications.

4) Clearance of Food Stuff Purchased via the Internet

SFDA allows imports of food products purchased via the internet for personal or commercial purposes without going through the required online pre-registration and import authorization requirements. However, the imported food products will be subjected to the necessary inspection procedures at the Saudi ports of entry to ensure that they comply with SFDA's regulations and requirements to ascertain they are fit for human consumption.

5) Imports of Product Samples

Samples destined to potential Saudi buyers or for display in Food Shows are exempt from Saudi labeling and shelf life regulations, but are subject to inspection at ports of entry. A commercial invoice specifying that the product is not for sale and has no commercial value must accompany samples, which are usually sent to Saudi Arabia by D.H.L. and similar carriers.

6) Imports of Product Samples

Samples destined to potential Saudi buyers or for display in Food Shows are exempt from Saudi labeling and shelf life regulations, but are subject to inspection at ports of entry. A commercial invoice specifying that the product is not for sale and has no commercial value must accompany samples, which are usually sent to Saudi Arabia by D.H.L. and similar carriers.

Foodstuff Monitoring

The Environmental Protection Department at the Ministry of Municipality and Rural Affairs is responsible for establishing nationwide food sanitation laws and guidelines. Inspectors at the municipality levels do monitoring of products already in the market. The authorities inspect retailers, wholesalers, restaurants, bakeries, fast food chains, vegetable and meat markets for expiration dates, sanitary and storage conditions as well as product handling. Outlets found selling unhygienic or expired products are exposed to stiff financial fines, temporary closure or both.

The majority of Saudi food imports enter the country via Jeddah port on the Red Sea or Dammam port on the Arabian Gulf. About 70 percent of all foodstuffs enter Jeddah port. Imports from Jordan, Syria, and nearby countries enter the Kingdom by truck.

King Khalid International Airport in Riyadh and King Abdulaziz International Airport in Jeddah also receive significant quantities of food items, particularly fresh fruits, vegetables and chilled meat. Fresh and chilled products are usually cleared within 24 hours of arrival.

SECTION X. COPYRIGHT AND/OR TRADEMARK LAWS

Royal Decree No. M/5 and Resolution of Council of Ministers No. 75 dated 1984 regulate trademark

registration laws in the Kingdom. According to the decree, trademarks are registered with the Trademark Registration Department of the Saudi Ministry of Commerce and Industry through a local agent or lawyer.

Once registration application is received, the Trademark Registration Department will require one month time to study the presented documents to decide on the request. If an application is approved, the department will publish the trademark in the official government Arabic language newspaper (Hum Al-Qura) with the cost of publication paid by the agent or owner of the trademark. The total registration cost is estimated at about \$2,000. Registered trademarks are protected for 10 years and can be renewed for another similar period or periods without any new inspection after republishing it in the official paper.

APPENDIX I. GOVERNMENT REGULATORY KEY AGENCY CONTACTS

SFDA sets food and feed products standards. Contact information for SFDA, and other ministries involved in food and agricultural products safety and inspection is as follows.

Dr. Salah Al-Maiman
Vice President Food Affairs
Saudi Food & Drug Authority (Inspects imported food and processed feed products)
Tel: 966-11-203-8222 ext. 202
Fax: 966-11-275-1788
www.sfda.gov.sa

Dr. Mohammed Al-Jasir
Director General
General Directorate of Nutrition Department
Ministry of Health (registers herbal preparations, health and supplementary foods)
Tel: 966-11-464-0811
Fax: 966-11-464-5536
Website: www.moh.gov.sa

Dr. Abdul Ghaniy Al-Fadhil
Director General
Plant and Animal Quarantine Department
MOA (inspection of live animals, plants, fruit, vegetables and animal feed)
Tel: 966-11-404-4292
Fax: 966-11-401-1323

APPENDIX II. OTHER IMPORT SPECIALIST CONTACTS

Saudi Arabia does not have any relevant import specialists that are not affiliated with the government.

Note: GSO issued standards are implemented in the seven member countries, Saudi Arabia, United Arab Emirates, Kuwait, Qatar, Oman, Bahrain and Yemen. English copies of GSO standards mentioned in this report and other food/agricultural related are available and can be purchased from the GSO headquarters in Riyadh by logging to the following link:

<http://www.gso.org.sa/standards/public/standardsList.seam>