



USDA Foreign Agricultural Service

GAIN Report

Global Agriculture Information Network

Template Version 2.09

Voluntary Report - Public distribution

Date: 3/4/2008

GAIN Report Number: TC8004

United Arab Emirates

FAIRS Subject Report

UAE Establishes Arabic Labeling Requirements for Food Products

2008

Approved by:

David Williams

Prepared by:

David Williams

Report Highlights:

The Government of the United Arab Emirates (UAE) has announced that effective April 25, 2008 all pre-packaged food products must have an Arabic label. The UAE, especially the Emirate of Dubai, has overlooked this requirement in the past. However, a recently approved Gulf Cooperation Council (GCC) standard and a new UAE consumer protection law are providing the impetus for regulators to require Arabic labeling on certain food products. A number of details concerning the implementation of the standard will have to be clarified by regulators over the next few weeks. Exporters should work closely with their importers to avoid trade disruptions.

Includes PSD Changes: No
Includes Trade Matrix: No
Annual Report
Dubai [TC1]
[TC]

Disclaimer: This summary is based on a *cursory* review of the subject announcement and therefore should not, under any circumstances, be viewed as a definitive reading of the regulation in question, or of its implications for U.S. agricultural export trade interests. In the event of a discrepancy or discrepancies between this summary and the complete regulation or announcement as published in Arabic, the latter shall prevail.

ATO Dubai Summary: The Government of the UAE announced recently that all imported pre-packaged food products must carry an Arabic label effective April 24, 2008. While Arabic labeling has always been required in the UAE, it was not always enforced, especially in the Emirate of Dubai, the largest food importing Emirate. This renewed emphasis on Arabic labeling stems from a new UAE standard that closely resembles a recently approved GCC standard (see TC7026 [USDA Foreign Agricultural Service \(FAS\) — Attache Reports](#)) and a new UAE labeling law covering all consumer products (also see TC7026). Based on discussions with local food officials, a few details concerning the enforcement of this new standard still need to be clarified. Officials are working on a “mechanism” for enforcing this requirement and hope to have it ready within a few weeks. Oman, Bahrain, Kuwait, and Qatar already enforce Arabic labeling.

ATO Dubai Analysis: The UAE has 23 entry points for food products and imports an estimated 80-90 percent of its food needs from a large number of countries. The renewed emphasis on Arabic labeling appears to be an effort to ensure that consumers can easily read labels for products from the diverse origins supplying the UAE.

The UAE approved a new labeling standard in April 2007 that closely mirrored a similar Saudi Arabian standard that had formed the basis for a GCC draft standard. The GCC draft standard was finalized and approved by all member countries as GS 9/2007 during 2007. While approved GCC standards should be adopted by member countries as domestic standards with a six-month phase in period, ATO Dubai understands that, given the similarity between GS 9/2007 and the April 2007 UAE domestic standard, officials have decided to move ahead with the Arabic labeling requirement before adopting the GCC standard. It is not clear what other aspects of GS 9/2007 the UAE may apply on the basis of overlap with its April 2007 standard. See TC7026 for additional background on the new GCC labeling and shelf life standards [USDA Foreign Agricultural Service \(FAS\) — Attache Reports](#).

Based on discussions with local food safety officials, a number of key issues still need to be clarified relative to the labeling requirement, a process which could extend beyond the April 24, 2008, enforcement date according to local officials. Abu Dhabi, Dubai, and Sharjah are the main food importing emirates and the main importers of U.S. food products. Smooth implementation of these new federal requirements will require coordination among all Emirates. Officials have indicated that affected parties may submit comments if they have suggestions for the enforcement of this requirement. A summary of key questions follows.

1. Will Arabic stickers be allowed? Based on discussions with officials, ATO Dubai understands that stickers will continue to be allowed for small shipments or consolidated shipments containing diverse products. However, for large shipments, exporters should begin to include Arabic text directly on their packaging. While the distinction between large and small shipments has not yet been determined, ATO Dubai understands that consolidated shipments containing a range of products in small lots would be considered smaller shipments, while large shipments would be whole containers of single products. Officials indicated that they would further clarify the distinction between large and small shipments over the next few weeks. ATO Dubai stressed that stickers provide consumers with the necessary information and should be considered as an appropriate labeling option regardless of the size of the shipment.

2. What information should my Arabic label or sticker include? ATO Dubai understands that stickers or labels should include the product name, brand name, a list of ingredients, and the weight. Stickers should be difficult to remove and not cover any of the original language text. Exporters should work closely with their importers on this point as this situation is in flux.

3. Should the sticker or label include production and expiration dates? No, these dates should continue to be printed directly on the packaging in a day/month/year format or month/year format depending on the product. Note that the newly approved GCC shelf life requirements should provide some relief on expiration dating once adopted by member countries. Nevertheless, U.S. officials have raised concerns about certain aspects of this standard.

4. Can my products be relabeled after arriving in the UAE? Officials indicated that they need to review this point further before making a decision.

5. Will my products be rejected if the labels do not comply on April 25? Officials indicated that they would likely issue warnings initially and would try to be flexible, but noncompliant shipments would be handled on a case by case basis.

6. Does the Arabic labeling requirement apply to products destined for hotel, restaurant, institutional, catering or food processing sectors?

Officials indicate that the standard does not currently apply to these products. However, this point is under review.

7. The text of the circular issued by the Dubai Municipality follows.

Ref: 812/02/02/34/801357 Date: January 24, 2008

Application of New Food Labeling Standard

To All Food Establishments in Dubai:

The Food Control Section is pleased to announce the gradual application of GCC-UAE standard # (9-2007) which is concerned with the labeling of prepackaged foodstuffs. In this regard, the following is decided:

1. A grace period of (3 months) is granted to apply the stipulations of the above mentioned standard.
2. Importing or selling any non-conforming foods after the grace period shall not be allowed, and such products shall be dealt with accordingly.

The Food Control Section calls on all food establishment to start applying this standard immediately instead of waiting till the end of the grace period to avoid unnecessary actions.

For acquiring a copy of this standard or any other standards, call UAE standards and Metrology Authority in Abu Dhabi tel: 02-671 1110, Dubai 04 294 4434.

3. The above decision will be effective from the date of issuance.

Comment: ATO Dubai will continue to follow up with local officials and encourages U.S. exporters to contact their importers to ensure that they are aware of the requirements and

discuss possible modifications to existing procedures for exporting to the UAE. While there are still a number of details relating to the enforcement of this new standard that need to be clarified, it appears that, at a minimum, pre-packaged food products will require an Arabic label or sticker as of late April.

Important Dates:

1. **Proposed Implementation Date:** April 25, 2008
2. **Validity Period:** Indefinite from the date of adoption
3. **Comments:** This is a final standard. However, importers or exporters may wish to suggest procedures for minimizing the disruption to food trade from this new standard.

For More Information:

Should you require more information on the above, please don't hesitate to contact us on the following:

Fax: 011-971-4-311-6189

E-mail: atodubai@usda.gov

Via the Internet:

Visit <http://www.fas.usda.gov/> for a complete selection of FAS worldwide agricultural reporting and ATO Dubai reporting.