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United Arab Emirates

Food and Agricultural Import Regulations and Standards

UAE Fairs Report

2004

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Report Highlights:

Report Updated June 19, 2004. Sections updated: All. The UAE implements food labeling and food shelf life standards as adopted by the Gulf Cooperation Council (GCC). Import duties are now unified across the GCC at 5 percent on practically all processed foods and zero duty for most unprocessed and staple products. The UAE presently restricts certain ruminant and poultry products from the U.S.

Includes PSD Changes: No
Includes Trade Matrix: No
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Section(s) Updated: All

Disclaimer: the Agricultural Trade Office of the USDA/Foreign Agricultural Service in Dubai, U.A.E. has prepared this report for U.S. exporters of domestic food and agricultural products. While every possible care has been taken in the preparation of this report, the information provided may not be completely accurate either because policies have changed since its preparation or clear and consistent information was not available. It is highly recommended that U.S. exporters verify all import requirements with local authorities through their importers, before sales conditions are finalized and goods are shipped. Final import approval of any product is subject to the rules and regulations as interpreted by the country of import at the time of product entry.

Please contact this office, if you have any comments, corrections or suggestions about the material contained in this report. Our e-mail address is: atodubai@usda.gov.

A. Food Law Overview

The United Arab Emirates (UAE) is a member of the Gulf Cooperation Council (GCC), which includes: Bahrain, Kuwait, Oman, Qatar and Saudi Arabia.

GCC member states continue to work towards harmonizing their food import standards with international standards, such as CODEX and OIE.

In 1993 the GCC ratified Gulf Standard (GS) 150/1993, Part I that established shelf-life standards for 118 products. This was the first major effort towards harmonizing food regulations GCC-wide.

For the most part, local regulations are based on GCC standards, when available. In the absence of GCC approved standards, in the UAE the General Secretariat of Municipalities (GSM) and the newly established "Emirates Standards & Measurements Organization" (ESMO) set the food safety regulations jointly. These regulations are usually based on recommendations made by the National Food Safety Committee (NFSC) on food related matters and by the Veterinary Committee (VC) on meat and poultry related matters.

The National Food Safety Committee (NFSC) consists of:

- Two representatives each from Abu Dhabi, Dubai and Sharjah municipalities;
- One representative each from the remaining five municipalities of the UAE;
- One representative each from the Ministries of Foreign Affairs, Economy & Industry, Agriculture & Fisheries (Agriculture Section) and Health;
- The Secretary General of the GSM;
- One representative from ESMO; and
- One representative from Al Ain University.

The Veterinary Committee (VC) consists of:

- One representative from the veterinary section of each eight municipalities of the UAE;
- One representative from the (Animal Wealth Department, Ministry of Agriculture and Fisheries).

The health department of each municipality is responsible for enforcing food safety standards on locally produced and imported foods through its food control section. While information is shared between municipalities, they operate independently. The municipalities of Dubai, Abu Dhabi, and Sharjah are the major entry points for imported food products, in descending order of trade volume and value.

Food products are regularly inspected at time of import, at production facilities and at point-of-sale. Fines are levied and products destroyed for severe violations. Imported and locally produced food products are subject to the same food safety regulations and labeling requirements. At present there are no environmental laws regulating food product packaging.

The UAE is a growing market for high value food products. Food is imported from more than 90 countries. The country is free trade oriented but does apply several non-tariff trade barriers in addition to the unified customs tariff, a major change in the country's previous position. It is very active in the re-export of food products to neighboring countries with more than 50 percent estimated eventually re-exported. The major regulatory barriers facing U.S. suppliers include:

- (1) Shelf life standards that is not science-based,
- (2) Labeling of production and expiry dates on most food products,
- (3) Labeling of dates in a day/month/year or month/year format only, and
- (4) The requirement of at least one-half a product's shelf life is remaining at time of import.

In January 2003, the UAE implemented the "GCC Unified Customs Law and Single Customs Tariff" (UCL). The UCL established a unified customs tariff of five percent on practically all processed food product. Under the UCL, live animals, fresh fruit and vegetables, seafood, grains, flour, tea, sugar, spices and seeds for planting are exempt from any duty.

The UCL also established a single entry point policy. In other words, a product entering any GCC member market would pay the appropriate duty at point of entry into the GCC, and then be permitted duty free transit among GCC member countries. To date, however, not every GCC country has implemented the single entry point policy for a variety of reasons, including disparity of food control procedures, quality of health laboratories and procedures for dividing tariff proceeds among member countries.

For the most part UAE officials work with companies to ensure that food and agricultural imports are not unduly disrupted or delayed at port of entry. Their work could be greatly reduced by adding more transparency to the regulatory system thru proper notification to the WTO and thru public announcement of changes. The present practice of sending notice to only a few major trading houses is insufficient to meet the requirements of a country that is so integrated in the international trade arena. Such private notification tends to spur public question of the UAE regulatory establishment and its mandate. Further, actions taken this past year by public health officials that were based on international press reports, not domestic or international standards, raise additional questions regarding the country's commitment to its international obligations.

Therefore, because of changing regulations and the enforcement autonomy of each GCC member country, exporters are strongly encouraged to work closely with their importers to obtain pre-export label and product clearance.

B. Labeling Requirements

For the most part, the UAE enforces the GCC regional "Gulf Standard" (GS) 9/1995 which regulates labeling of food. A major exception to this standard is that the UAE, so far, accepts English-only labels and does not enforce the Arabic-label requirement on food products. However, given this country is a major transshipment point to the rest of the Arabic speaking region, bilingual labels (e.g., Arabic/English) or Arabic stickers containing crucial label information is recommended. Once a unified GCC food standard is adopted and enforced, all products imported into a GCC member country would require a bilingual label.

In general, the standard U.S. label meets most UAE label requirements. The production date requirement is a key difference. Under current UAE regulations, a food label must contain the following information:

- Product and brand name;
- Ingredients in descending order of proportion;
- Additives using their "E" number (group names are accepted, see appendix B.);
- The origin of all animal fats (should be of Halal origin) 1/;
- Net content in metric units;
- Production and expiry dates (see below for details);
- Country of origin;
- Manufacturer's/exporter's name and address;
- Special storage and preparation instructions, if any.

1/ Note: usage of pork fat, as with all pork related products as ingredients, is restricted. Non-Halal meats are permitted import thru an exemption issued by the Director, Food Control Section of the municipality subject to certain restrictions such as to be sold to non-Moslems in designated establishments only.

Labeling regulations apply to products shipped in bulk and institutional-sized containers. For example, bulk cartons of fresh fruits and vegetables must contain most label information, but need not carry production/expiry dates.

Labels for specialty foods, such as diet, health and baby foods, must contain detailed information about the product's vitamin and mineral contents, nutritive value per 100 grams and proper use and storage. The U.S. nutritional panel is acceptable. There is no RDA labeling requirement. In general, U.S. nutritional labeling is acceptable and may eventually be the basis for local nutritional labeling standards.

Labels for pork and pork containing products must comply with general labeling requirements and must clearly state that the product contains pork. Food labels may not contain pictures of, nor may recipes list pork or alcohol. Alcoholic beverages and alcohol containing products can be imported but only through authorized importers and retail shops.

As with food products, labels for pet foods are required to be printed in Arabic but English only labels are accepted. Arabic/English labels are permitted, as are Arabic stickers in lieu of Arabic labels. The pet food label must contain the statement, "Not fit for human consumption." Production/expiry dates are required for pet foods as well. Since the report of the single BSE case in the U.S., the UAE has banned imports of pet food containing meat and meat by-products from the U.S.

The U.A.E. enforces the GCC GS 150/1993, Part I, which regulates the shelf-life durations for approximately 118 food products. Under GS 150, production/expiry dates for selected products must be engraved, embossed, printed or stamped directly onto the original label or primary packaging at the time of production, using indelible ink. P/E dates printed on stickers is not an acceptable alternative. U.S. bar coding is not accepted in lieu of P/E dates. Only one set of P/E dates on the label is permitted. P/E dates must be printed in the following fashion, depending upon the shelf-life of the product:

- Day/month/year for products with a shelf-life of six months or less;
- Month/year for products with a shelf-life longer than six months.

Under the month/year format, the last day of the month is considered the expiry date. The month may be printed in numbers or letters. For example, both 3/03 and March 03 are acceptable formats.

The word "Production" or the letter "P" must precede the production date. The expiry date must be preceded by one of the following statements: "Expiration (date)"; "Use by (date)"; "Use before (date)"; "Sell by (date)"; "Valid until (date) from the date of production"; or the letter "E."

With few exceptions, a product must have at least one-half of its shelf life remaining at the time of import. Meat and poultry products must be imported within four months of their date of production, regardless of the length of their shelf life.

The following products are specifically exempt from expiration dates: salt, white sugar, dried legumes, dried vegetables, spices and other condiments, tea and rice. However, importers prefer to have such products labeled with production and expiry dates, as consumers tend not to be aware of this exemption.

Most major municipalities offer the following services to facilitate food product imports:

- Pre-shipment approval of food labels: Copies of labels can be sent (fax copies are acceptable) directly to inspection officials for review, free-of-charge. If approved, a notice will be issued to accompany the product and facilitate inspection at the time of arrival.

- Pre-shipment approval of products: Officials will analyze a product to determine compliance with food ingredient standards. Costs involved vary, depending on type of product and ingredients. Laboratory testing normally is required on first consignments to the UAE.

Occasionally, local health officials will permit the importation of food products with minor labeling infractions. Exemptions are granted on a one-time basis and the sale of such products usually is limited to institutional end users.

In view of the most nations now changing to accept/adopt the Codex Alimentarius and following the recommendations of the WTO, it is expected that the UAE will move in the future to adopt the Codex's labeling regulations.

C. Food Additive Regulations

UAE Standard # 23/2000 (GS 23/1998), regulates the use of food coloring additives, while UAE Standard # 356/1995, regulates the use of food preservatives. In absence of a GCC or a UAE standard, the UAE will recognize an international standard (e.g., Codex Alimentarius, European, U.S. standard, etc.). Rarely is an illegal food additive or ingredient detected in U.S. origin products. Nevertheless, the exporter is encouraged to work closely with his importer to ensure the product meets U.A.E. food additive requirements. U.A.E. health authorities note with regard to new-to-market products "The addition of food coloring, preservatives, antioxidants and non-nutritive sweeteners is restricted." The Food Control Section of the Municipality should be contacted for further details."

D. Pesticide and Other Contaminants

In absence of a GCC or U.A.E. standard, the U.A.E. will recognize the Codex Alimentarius Volume 2 B standard that governs pesticide and other contaminant residue levels. Chemical contamination is a growing concern of U.A.E. authorities and efforts are underway to update local guidelines and improve testing procedures. Food products meeting U.S. residue

standards will most likely meet future U.A.E. standards. It is very rare that U.S. origin products are rejected due to pesticide or other contaminant residues.

E. Other Regulations and Requirements

All imported food products must be accompanied by:

- A health certificate issued by the appropriate government agency in the United States, attesting to the product's fitness for human consumption;
- A Halal slaughter certificate issued by an U.A.E.-approved U.S. Islamic Center must accompany all meat and poultry products,
- Bill of Entry or Airway Bill;
- Packing list.

The UAE Embassy or one of delegates in the United States must notarize health and Halal slaughter certificates.

There are no special packaging or container size requirements for food products. The UAE does not allow the importation of irradiated food products. A radiation-free certificate is required for food products from Europe and Asia. U.S. products are exempt from this requirement.

There are no specific requirements for imported food samples. Samples for food shows and other promotional events are routinely exempt from local labeling and shelf life requirements. Product samples must be clearly marked as samples and accompanied by a statement claiming that they are not for sale.

Since 1998 the U.A.E. has levied a commercial invoice legalization fee (equivalent to 1 percent of the consignment value) on all imported products. The fee can be paid at the U.A.E. Embassy/Consulate in the United States or in the U.A.E. upon arrival. Products will not be released from Customs until the fee is paid.

F. Other Specific Standards

Other than U.A.E. standard (254/1995) for "baby food based on milk," there are no special standards for specialty food products, such diet or health foods.

Inspection officials routinely check for salmonella in poultry products. If salmonella is detected in more than 20 percent of tested samples, the shipment will be rejected.

Imports of alcoholic beverages are strictly controlled. Only a few local companies are licensed to import and sell alcoholic beverages. These products are exempt from local labeling requirements. The import of non-alcoholic beverages is permitted, but these products cannot contain more than 0.05 percent of alcohol by volume. These products are also exempt from local labeling requirements. The sale of pork products is strictly regulated and confined to well-marked areas of supermarkets. Restaurants must clearly identify products on the menu that contain pork. Only selected retail outlets and hotels are permitted to sell pork.

The U.A.E. Ministry of Agriculture and Fisheries (MAF) are responsible for regulating the importation of live animals and plants.

G. Copyright and Trademark Laws

The U.A.E. is tightening trademark and brand name protection rules. Trademark registration is not mandatory but protection may be limited unless officially registered. Trademark infringement problems are rare in the food sector.

Trademark registration is the responsibility of the Trademark Section, Ministry of Economy and Commerce. A foreign company may register a product/brand directly with the Ministry. To speed the process, however, it is recommended that a local law firm be retained.

The U.A.E. no longer permits sole agency agreements for food brand names. This means that a local company can no longer register itself with the government as the exclusive importer/distributor of a specific brand. Agency agreements registered prior to June 1996, however, will continue to be recognized.

H. Import Procedures

The U.A.E. boasts some of the most modern air and seaport facilities in the world. Food shipments usually are off loaded, inspected by health officials and cleared through customs within hours of arrival at port. (Dubai ports are the primary entry points for food products.)

Every food shipment is subject to visual inspection upon arrival to ensure compliance with label and shelf life regulations. Shipments are subject to random laboratory analysis. Baby foods and edible oils are subject to 100 percent sampling. Other food products are sampled in accordance with the sampling policy manual, which sets out the frequency of sampling based on food type, brand and country of origin. A consignment undergoing laboratory analysis is stored under bonded warehouse selected by the importer, within the same emirate of arrival. Laboratory results are generally known within 5-10 days. New-to-market food products are subject to thorough laboratory analysis. Once cleared, they are subject to random sampling as are other food products on the market.

A product will be rejected if found unfit for human consumption or if non-compliant with label requirements. In either case, the product would be destroyed by the local municipality or re-exported to the country of origin within 30 days, at the importers discretion. Products not conforming to label requirements may be permitted to be re-exported to a third country (non-GCC). Fines may be imposed, depending on the severity of the violation.

A product rejection may be appealed to the Health Department having jurisdiction over that port. A special committee within the municipality will review the petition and issue a final decision normally within a few days to one week. The committee's decision is final.

In case of a minor label infraction, a shipment may be permitted entry on a one-time basis for limited sale, i.e., to institutional end-users only. A major infraction, such as improper labeling of products containing pork or tampering with P/E dates, is severely punished, particularly those infractions discovered after import. Such products are automatically banned from import, usually for several months, and the brand name and importer is often reported in the press.

Appendix A – Major Regulatory Agencies

Federal Government Contacts:

- | | |
|---|--|
| <ul style="list-style-type: none">❑ H. E. Jassim M. Darwish, Secretary General❑ Mr. Obeid Bin Essa Ahmed, Assistant Sec. General
General Secretariat of U.A.E. Municipalities
P.O. Box 5665
Dubai, U.A.E.
Tel: (9714) 223-7785; Fax: (9714)223-6136
E-mail: gsmdxb@emirates.net.ae❑ Mr. Waleed Bin Falah, Director General
Emirates Authority for Standards & Metrology
P.O. Box 2166
Abu Dhabi,
Tel: 9712/671-1110; Fax: 9712/671-5999❑ Mr. Abdullah Sultan
Director, Animal Wealth Department
Ministry of Agriculture and Fisheries
P.O. Box 1509
Dubai, U.A.E.
Tel: 9714/295-8161; Fax: 9714/223-2781❑ Mr. Mohammed M. Abdullah
Head, Plant Quarantine Division
Ministry of Agriculture and Fisheries
P.O. Box 1509
Dubai, U.A.E.
Tel: 9714/266-2781; Fax: 9714/265-4787 | <p>Oversight of National food
Safety Committee</p> <p>Standards and specification
issues</p> <p>Live animal imports</p> <p>Plant imports</p> |
|---|--|

Municipality Contacts: Recommend as first point of contact for food import requirements and pre-export certification of labels and ingredients.

- Mr. Khalid M. Sharif
Head, Food Control Section
Dubai Municipality
P.O. Box 67
Dubai, U.A.E.
Tel: 9714/206-4201; Fax: 9714/223-1905
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- Dr. Amin M. Yousuf
Director, Food and Environment
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Abu Dhabi Municipality
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- Dr. Rasha A. Sultan Al Qassemi
Head, Central Food Control Laboratory
Sharjah Municipality
P.O. Box 22
Sharjah, U.A.E.
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- Ms. Amina Ahmed Al Jasemi
Head of Food & Environment Laboratory Section
Dubai Central Laboratory Department
Dubai Municipality
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Dubai, UAE
Tel: 009714/301-1619; Fax: 009714/335-8448
E-mail: labs@dm.gov.ae

Appendix B – Permitted Food Colors

The following is a list of food colors, natural and artificial, permitted in the U.A.E.:

1. Food Colors - Natural

Color/Description	International Number	Other Names
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Red to Yellow Colors

Carmine	120	Cochineal, Carminic Acid
Annato extracts	160B	Bixin, Norbixin
Beta Carotene	160A	Carotene blend
Lycobine	160D	
Beta-Apo-8-carotenal	160E	
Beta-Apo-8-carotenoid acid	160F	
Lutein	161B	
Carrot oil	None	
Beet root red	162	Betanine

Red to Purple Shade

Anthocyanins	163(i)	
Grape skin extract	163(ii)	
Blackcurrant extract	163(iii)	Enocianina
Beet powder	None	
Paprika	None	
Paprika oleoresin	160C	

Orange and Yellow Colors

Saffron	None	Natural yellow 6
Turmeric powder	100(ii)	
Curcumin	100(i)	
Turmeric oleoresin	None	
Riboflavin	101(i)	
Riboflavin-5-Sodium Phosphate	101(ii)	

Green Colors

Chlorophylls	140	Chlorophyllins
Chlorophyll copper complex	141(i)	
Sodium and potassium salts of chlorophyll copper complex	141(ii)	

Brown Colors

Plain caramel	150A	
Caustic sulphite caramel	150B	
Ammonia caramel	150C	
Ammonia sulphite caramel	150D	

Black Color

Activated vegetable carbon	153
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Inorganic Colors

Titanium dioxide	171	Food white 6
Iron oxides	172	

2. Food Colors - Artificial**Red Colors**

Azorubine	122	Carmosine, Food red 3
Allura Red 17	129	Food red 40

Yellow Colors

Sunset yellow FCF	110	Food yellow 3, Food orange S, Yellow 6 for food, drugs and cosmetics
Tartrazine	102	Food yellow 4, Yellow 5 for food, drugs and cosmetics

Brown Color

Chocolate brown HT	155	Food brown 3
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Green Color

Fast green FCF	143	Food green 3, Green 3 for food, drugs and cosmetics
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Blue Colors

Indigotine	132	Carmine indigo, Blue 2 for food, drugs and cosmetics , Food blue 1
Brilliant blue FCF	133	Food blue 2, Blue 1 for food, drugs and cosmetics

Black Color

Brilliant black BN	151	Food black 1, Black PN
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Appendix C – Coloring allowed in Select Foods

International Number	Color	Food	Maximum Limit
127	Erythrosine	Cherry and Products	None
128	Red 2 G	Sausages	20 ppm
161G	Canthaxanthin	Cooked Sausages	30 ppm
		Frozen Foods	100 ppm
173	Aluminum	External Cover for Cake and Pasta	According to Good Production Practice
174	Silver	External Cover for Sweets	According to Good Production Practice
175	Gold	External Cover for Sweets	According to Good Production Practice
180	Lithotrubine	Cheese Covering	According to Good Production Practice
None	Orange B	Sausage and Frankfurters Covering	150 ppm
None	Citrus Red 2	Orange Peel	2 ppm

Parts per million = ppm

Appendix D – Prohibited Coloring

International Number	Color	Remarks
104	Quinolin yellow	Prohibited in all food products
124	Ponceau 4R	Prohibited in all food products