Ministry of Foreign Affairs

Trade Barriers Facing Dutch Exporters in Egypt

Commissioned by the Netherlands Enterprise Agency

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Trade Barriers Facing Dutch Exporters in Egypt.

"An Exporters Manual"

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Embassy of the Kingdom of the Netherlands

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List of abbreviations

Abbreviation	Definition
GOEIC	General Authority for Export and Import Control
NFSA	National Food Safety Authority
EFTA	European Free Trade Association
EU	European Union
ITC	International Trade Centre
OEC	Observatory of Economic Complexity
IDI	In-depth Interview
CIF	Cost, Insurance and Freight
FTA	Free Trade Agreement
COMESA	Common Market for Eastern and Southern Africa
SADC	Southern African Development Community
EAC	East African Community
IPR	Intellectual Property Rights
WTO	World Trade Organization
TRIP	Trade-Related aspects of Intellectual Property Rights
RMS	Risk Management System
CBE	Central Bank of Egypt
ILAC	International Laboratory Accreditation Cooperation
IAF	International Accreditation Forum
MALR	Ministry of Agriculture and Land Reclamation
NVWA	National Plant Protection in Netherlands
CAPQ	Central Administration of Plant Quarantine
UPOV	Union for the Protection of New Varieties of Plants
LC	Letter of Credit

Executive Summary

Egypt is a crucial trade and strategic partner of the Netherlands. This is highlighted through multiple trade agreements between Egypt and the European Union such as EFTA and Egypt-EU partnership. The Egyptian economy is diversified with a strong reliance on the agriculture sector. This is regarded as a market opportunity for multiple European companies since the size of Egyptian market is relatively large due to its sizeable population. Hence, the objective of this manual is to offer a detailed guidance to Dutch exporters on how to export certain agricultural commodities to Egypt. The manual does not focus only on giving a detailed analysis of the process of exporting, but also it sheds the light on the estimated fees and time as well as commodity specific challenges and some of the best practices to overcome such challenges.

The manual will focus on explaining the process of exporting the following agricultural commodities:

1. Vegetable seeds.
2. Potato seeds.
3. Pesticides
4. Chemical fertilizers.
5. Organic pesticides and fertilizers.
6. Meat and chicken products.
7. Dairy products.

In line with the objective of the assignment, the study capitalized on secondary and primary sources of information available on policies and procedures of agricultural imports in Egypt. Secondary research utilized include existing sources of data on the target items as well as scrutinizing available guides that direct companies on Egyptian import procedures. Furthermore, primary research utilized the knowledge of experts on import procedures and generic guidelines covering the areas of the manual's focus.

Based on the findings of the research conducted, there are some general challenges that encounter Dutch exporters regardless of the type of commodity being exported. First of all, one of the main barriers that encounters Dutch exporters when exporting to Egypt is the requirement of mandatory registration of companies at the General Organization for Export and Import Control (GOEIC). The lengthy process remains one of the main challenges in this regard as there is a lack of clarity on how much time it takes to obtain the approval of the registration. Moreover, the issuance of a letter of credit is a core challenge that faces local importers in Egypt. The uncertainty of its implementation across the different products is also a core problem that leaves importers in a vague situation. However, this uncertainty is temporary given the fact that the implementation is relatively in the starting phase. Adding to that, valuation at customs is conducted on case-by-case basis. Hence, customs authority reevaluate the value of imported goods and they assign a new price value to the imported products as they see convenient. Hence, customs put the imports in a higher value bracket, leading to imposing higher tariffs on the imported products. Moreover, ACID system, developed by the ministry of finance and customs authority, was a core challenge specially during the first phase of its implementation. This was due to the vague and not finalized interface. The main issue that remains currently is that the process isn't fully digitalized.

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Finally, the main issue that persists across the process of exporting agricultural commodities of focus is the lengthy process of obtaining approvals from different government entities as a result of high levels of bureaucracy and lack of clarity on the procedures.

Introduction & Methodology

Egypt is a crucial trade and strategic partner of the Netherlands. This relies on the trade agreements between Egypt and the European Union such as EFTA and Egypt-EU partnership. In addition, because the Egyptian economy is diverse and relies heavily on the agriculture sector, trade between both countries, especially that of agriculture products, is facilitated. Also, Egypt's strategic location offers companies a platform for their commercial and agriculture activities in the Middle East and Africa.

Notwithstanding, Dutch exporters face several challenges throughout the process of exporting the below list of agricultural products and input supplies:

- Vegetable seeds and potato seeds
- Fertilizers, pesticides, and crop protection
- Dairy products
- Live animals

These challenges mainly revolve around (1) the continuous changes in the laws and regulations, (2) unclear and long processes, (3) ambiguous resolutions, and (4) other technical and non-technical barriers to trade.

In the light of this, this manual is directed to Dutch exporters at the aim of explaining the process of exporting the abovementioned categories.

Additionally, the manual displays the expected challenges throughout each step, as well as best practices to mitigate whenever relevant. In accordance, the manual is structured as follows:

- Chapter one: The main trade barriers in Egypt.
- Chapter two: The common requirements and procedures for all exporters.
- Chapter three: The process of exporting vegetable seeds and potato seeds.
- Chapter four: The process of exporting pesticides and fertilizes
- Chapter five: The process of exporting live animals
- Chapter six: The process of exporting meat and dairy products

1) Methodology:

In line with the **objective** of the assignment, the study capitalized on secondary and primary sources of information available on policies and procedures of agricultural imports in Egypt. **Secondary research** utilized include existing sources of data on the target items as well as scrutinizing available guides that direct companies on Egyptian import procedures. Furthermore, **primary research** utilized the knowledge of experts on import procedures and generic guidelines covering the areas of the manual's focus.

a) Secondary research

Following the identification of the information areas, a preliminary desk review (i.e., secondary research) was carried out to set the understanding of the subject under study, and accordingly contribute to the designing of the primary research plan and tools.

The preliminary desk review conducted captures the process of exporting the identified list of agricultural products to Egypt, the main rules and regulations governing this process, steps of registering in the ACID system and the main challenges faced by the Dutch companies throughout the whole process.

Preliminary secondary research is collected primarily from the below sources:

- Access 2 markets portal
- Nafeza – Egypt
- Market Access Map as well as other tools under the ITC (International Trade Centre)
- The Observatory for Economic Complexity (OEC)
- Other relevant portals

b) Primary research

The primary research approach adopted to develop this manual was based mainly on conducting in-depth interviews (IDIs) with key stakeholders involved in the trade process for each category. Thus, ***14 IDIs*** were conducted with Dutch exporters, Egyptian importers and key representatives of the concerned governmental entities. This allowed the study to provide a holistic view for the trading process to include the main challenges faced by Dutch exporters, best practices to mitigate such challenges and relevant laws and regulations affecting the whole process. The below table displays, for each category, the IDIs conducted with the relevant stakeholders.

Table 1 Stakeholders interviewed by product category

Category	Dutch exporter	Egyptian importer	Governmental entities
Dairy products	Representative of "FrieslandCampina"	Representative of "Distribution 60"	Representatives of National Food Safety Authority
Vegetable seeds and potato seeds	Representatives of "Rijk Zwaan"	Representative of "Orma"	Representative of Central Administration of the
	Representative of "HZPC"		

Pesticides	Representative of "Corteva"		Egyptian Plant Quarantine
Fertilizers	-		Representative of Egyptian Center of Organic Agriculture
	-	Representative of "newfert"	
Meat	Representative of "Zwan meats"	Representative of local importer of "Zwan meats"	Representative of General Authority for Veterinary Services

Chapter One

Exporting to Egypt is subject to several challenges bearing in mind the continuous changes in the processes, and rules and regulations that took place lately. The main aim of this chapter is to generally examine the trade barriers faced across the product categories under study.

1) Entering the Egyptian market: Potential and Opportunities

Having a structural shortage of several agri-food products provides a core justification for Egypt being an important strategic partner for European countries. Additionally, Egypt has a huge market with a growing demand for most of agricultural products which entails the high import level from European countries across various products. Moreover, Egypt is featured with easy market access procedures for products that doesn't require registration in General Authority for Export and Import Control (GOIEC).

The existence of an Associate Agreement between EU and Egypt is a key opportunity that facilitates international trade regarding some agricultural products bearing in mind the great potential for European exports of dairy, fresh meat, chocolate & confectionary. Moreover, the creation of new system of the National Food Safety Authority (NFSA) shall ease the process as it leads to providing a harmonized food law.

a) Free trade zones

Having 2 types of free trade zones, public and private, implies the expansion of the areas in which imported products are subject to an annual duty of 1% of their Cost, Insurance and Freight (CIF), except for transit goods.

Nonetheless, products brought into the Egyptian customs territory from a free trade zone are considered imports, hence they are subject to customs clearance and full customs duties. Free trade areas in Egypt are scattered as following:

- Alexandria Free Zone
- Craftsmen Free Zone (Giza)
- Damietta Free Zone
- East Port Said Port
- Ismailia and New Ismailia Free Zones
- Matahra Free Zone (Minya)
- Media Free Zone (Giza)
- Nasr City Free Zone (near Cairo Airport)
- Nuweiba Free Zone (South Sinai)
- Port Said Free Zone
- Qeft Free Zone (Qina)
- Safaga Free Zone (Red Sea)
- Saleyeya Free Zone (Sharqiyya)
- Shebin El-Kom Free Zone (Manufiyya)
- Sohag Free Zone
- Suez Free Zone
- Toshka Free Zone (Aswan)
- 10th of Ramadan Free Zone (Sharqiyya)

b) Trade agreements

The most effective trade agreements Egypt has concluded are continental FTAs, notably the Agadir and COMESA agreements. Nonetheless, the bilateral FTA with Turkey is of particular importance for the agri-food sector: Turkish food items (notably apples, nectarines, chocolate and confectionary) are indeed similar to the ones produced in the EU, although they have a competitive advantage, i.e. they are produced at lower costs and hence offered at a more

affordable price to the final consumer. Similarly, the Egypt-Mercosur FTA gives a competitive advantage to Brazilian exporters of fresh meat into the Egyptian market. Furthermore, the Tripartite Free Trade Agreement between COMESA, SADC (Southern African Development Community) and EAC (East African Community), and the Continental Free Trade Area, which is still to materialize, upon ratification in some member states, are likely to provide EU agri-food producers with notable competition.

c) Import tariffs

Import duties on most agri-food products entering Egypt are well below 20%. Duties are imposed on some fresh and processed meat products, pasta, baked goods, chocolate and confectionary products. In addition to the import duty, European enterprises also face a Value Added Tax, which is levied at a rate of 14% of the duty paid value.

Nonetheless, under the EU-Egypt Association Agreement, trade of several other agri-food products, mostly agricultural commodities – including bovine, sheep/goat meat and almost all poultry meat products, dairy products, fruit and vegetables, olive oil, live plants, and processed cereals – was fully liberalized.

d) Intellectual Property rights

Egypt is a member of the main international agreements on intellectual property rights (IPRs). Notably, as a member of the World Trade Organization (WTO), Egypt is part to the Trade-Related aspects of Intellectual Property Rights (TRIPs) Agreement, which sets down minimum standards for the protection of copyrights and trademarks, including geographical indications. Indeed, to better align its IPR system to the international standards, Egypt approved the Intellectual Property Rights Law No. 82 in May 2002, which also covers the protection of Marks, Tradenames and Geographical Indications.

Moreover, Egypt is a member of the International Union for the Protection of New Varieties of Plants (UPOV). UPOV is an intergovernmental organization based in Geneva, Switzerland. UPOV was established in 1961 by the International Convention for the Protection of New Varieties of Plants (the "UPOV Convention"). The mission of UPOV is to provide and promote an effective system of plant variety protection, with the aim of encouraging the development of new varieties of plants, for the benefit of society. There are no restrictions on who can be a breeder under the UPOV system: a breeder might be an individual, a farmer, a researcher, a public institute, a private company etc.

The UPOV Convention provides the basis for members to encourage plant breeding by granting breeders of new plant varieties an intellectual property right: the breeder's right.

2) General barriers

a) Mandatory registration of factories exporting to Egypt (Decrees 43/2016 and 44/2019)

One of the main barriers that encounters Dutch exporters when exporting to Egypt is the requirement of mandatory registration of companies at the General Organization for Export and Import Control (GOEIC). As per decree 43/2016, factories exporting specific types of

products including agricultural products (which is the focus of this manual) will have to register their factories. Moreover, factories must submit a certificate indicating that factories have a quality control system in place. Adding to that, documents must be approved by the Chamber of Commerce and the Egyptian Embassy at the country of origin. The lengthy process remains one of the main challenges in this regard as there is a lack of clarity on how much time it takes to obtain the approval of the registration.

The Key changes as per decree (43/2016) include:

- A Ministerial Decree is no longer needed to finalize registration
- Registration process through Egyptian embassies and within 15 days
- Introduction of a mechanism to appeal cancellation of registration
- The procedure will be more transparent through publication decisions in the Egyptian Gazette and GOEIC's website

The details of this process are thoroughly explained in Chapter Two.

b) Valuation of imports for the purposes of customs clearance

Since Egypt is a member at World Trade Organization" WTO", Egypt is subject to Customs Valuation Agreement. As per articles 11 and 22 of the Customs Law 66/1963, amended by Law 95/2005, customs valuation of imports should refer to an ad valorem tariff based on the declared value, which is the real value of the good in addition to related costs.

Despite this agreement, Egyptian Customs Authorities do not necessarily follow this approach and in some cases valuation at customs is conducted on case-by-case basis. For instance, in some cases, customs authorities may disapprove the value of imports stated in the commercial invoice despite being sealed by the Chamber of Commerce in the country of origin. Therefore, customs authority reevaluate the value of imported goods and they assign a new price value to the imported products as they see convenient. Hence, customs put the imports in a higher value bracket, leading to imposing higher tariffs on the imported products. Moreover, the operators are subject to a penalty that is equal to the value of the levied tariff.

c) Issuing a letter of credit (LC) from the Central Bank of Egypt (CBE)

In an attempt to restrict and control the volume of Egyptian imports, the CBE declared that all transactions between local importers and exporters shall be through a letter of credit. The details of this process are thoroughly explained in Chapter Two. This raised an issue among the importers as it increased the length of the process for the importers. Additionally, this made it obligatory for importers to attain the shipment's payment immediately which wasn't the case when the transactions were carried out with no third parties.

d) Several measures on imports related to Covid-19

COVID outbreak had serious economic implications on the Egyptian economy, and as a result Egypt started enforcing multiple measures on a range of imported products.

To begin with, Egypt intensified COVID-19 checks on a range of food and agricultural products. Such checkups were conducted by the Ministry of Health (MoH)' General Authority for Veterinary Services. Testing food and agricultural products usually take up to 48 hours and are free of charge. However, the exact duration which it takes to conduct COVID-19 checks

on livestock is not clearly identified. It is also unclear who pays the fees for such checks. One of the main challenges is that Customs clearance documents do not clearly disclose the exact specifications of COVID-19 checks. By the end of 2020, only checks for live animals and meat were still applicable.

Adding to that, Covid-19 imposed constraints on the government budget resulting in increasing deficits. Hence, the Minister of Finance increased a range of customs fees as per the executive regulations of the Customs Act (Law 66 of 1963). The fees that witnessed a surge are shown in the following list:

- Deposits that should be paid for the clearance of goods.
- Fees paid to customs authorities for the goods which are stored at customs.
- Fees paid for issuing official documents.

Note: this measurement is enforced permanently, which will impose significant financial pressures on traders.

e) ACID system

ACID system, developed by the ministry of finance and customs authority, was a core challenge specially during the first phase of its implementation. This was due to the vague and not finalized interface. This problem is no longer an issue as the interface has been effectively developed and improved. The main issue that remains currently is that the process isn't fully digitalized. The whole point of creating this system is to reduce the time of release at the customs and transform the process into a digitalized one, however, the importers remain obligated to show hard copies of the shipment's documents despite sending them through Nafeza and Cargo X systems. This is expected to be resolved when the system is fully operating with no expected technical bugs or difficulties from the importers' side.

The details of this process are thoroughly explained in Chapter Two.

3) Barriers faced by Meat exporters

a) Import permits for chilled, frozen, and processed meat

According to decree 2080 of 2018, processed meat exporters and local importers must apply for an import permit to a standing committee. Traders have reported that their requests for import permits have been denied orally without the provision of an explanation. This scheme guiding the process of import permit issuance represents a serious trade barrier to exporters and importers due to the lack of transparency of committee meetings and the lack of possibility of appeal.

This process is further explained in Chapter Five.

4) Barriers faced by Seeds exporters

b) Continued changing of import conditions for imports of seed potatoes:

Egypt alters the requirements for importing seed potatoes annually. Seed potatoes are mainly imported from the European Union (EU). The problem arises when the new requirements are published with close proximity to the import season, which hinders stakeholders from commenting or from requesting more clarifications regarding multiple phytosanitary

conditions, leading to trade interruptions. It should be noted that Egypt now accepts certifications according to EU standards regarding some of the phytosanitary requirements.

The duration of obtaining the import permit is a core challenge as well. Exporters believe that specifying the duration to apply for import approvals between May and April is very challenging. This hinders other companies from applying for import permits through the year.

The details of the process of importing seed potatoes and some of the expected challenges that traders may encounter are thoroughly discussed in Chapter Three.

Chapter Two

This chapter will focus on providing a detailed guide for the process of registration using ACID system and will also provide a detailed explanation of the newly imposed regulation regarding the letter of credit “L/Cs”. Moreover, the steps of registering factories at the General Organization for Export and Import Control will thoroughly explained.

1) ACID System

In line with the Egyptian government plans to digitalize the Egyptian economy, a new electronic system for the pre-registration of shipment information: the "Advanced Cargo Information (ACI)" has been introduced by the Egyptian customs authority. It came into effect October 2021 for all shipments coming to Egypt through seaports and will be mandatory on all shipment coming to Egypt through airports starting October 2022.

It is worth noting that the Egyptian Government is starting to implement the Advance Cargo Information (ACI) declaration for air-borne cargo shipments soon. CargoX and the Government of Egypt’s NAFEZA will start testing the ACI Air declaration on 15 May 2022. The process will become mandatory on 1 October 2022.

The ACI for air-borne cargo will be the gateway to exporting products to Egypt by air. It will allow you to pre-lodge shipment documents and data electronically in a secure and prompt manner, so that the customs and OGA procedures on the Egyptian side may be accomplished prior to your shipment arrival at the Egyptian airport.

For customers exporting to Egypt by air, this will become a unified channel. You will save effort, time and money, and reduce risk of delays. The ACI system will expedite your shipment clearance, and it will also bring you one step closer to the digital trade finance platform upon which Egypt is currently working.

Advance Cargo Information (ACI) requires cargo data or documents (Pro-forma invoice and draft bill of lading-if exist) at least 48 hours before cargo shipment from export country, to enable stakeholders to monitor any risk to the state through the Risk Management System (RMS), with the highest priority given to the security of Egyptian citizens. This requires two operating arms; Egyptian importers should register on NAFEZA, the National Single Window for Foreign Trade Facilitation system, while Exporters need to register on the CargoX system.

The interlinkage between both systems is operating under Block Chain Technology. Block-chain is a technology that allows a person (or company) to transfer valuable data or

documents to another person safely and without the intervention of any intermediary. Block-chain is simply a series of fixed records or blocks of data and is managed by a group of computers that are not owned by any entity. Data blocks are secured and linked to each other using cryptographic principles.

Block-chain is a simple and innovative method to pass information from person A to person B in a fully automated and secure manner. One Party initiates the transaction by creating a block. That block is verified by thousands, perhaps millions, of computers distributed throughout the network. The verified block is then added to a chain stored in the network, creating a unique record associated with other records. To forge a single record, the entire chain has to be forged on millions of computers, which is practically impossible.

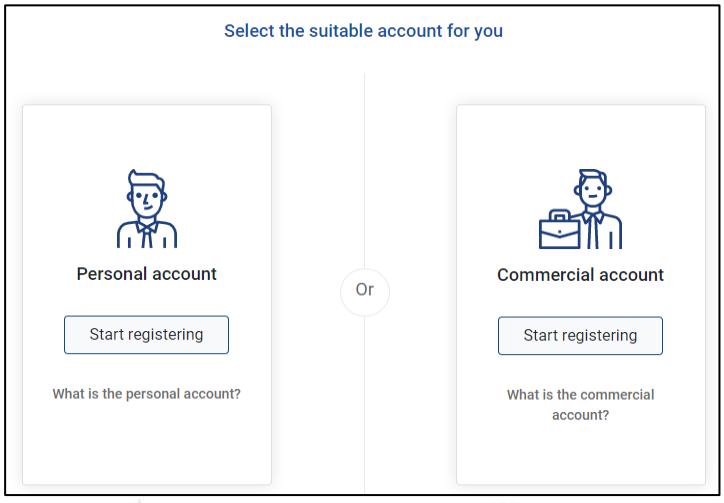
a) Registration on NAFEZA

Registration on NAFEZA is a mandatory step for the Egyptian local importers to be able to extract the ACID number for each shipment and to communicate with the exporters as well.

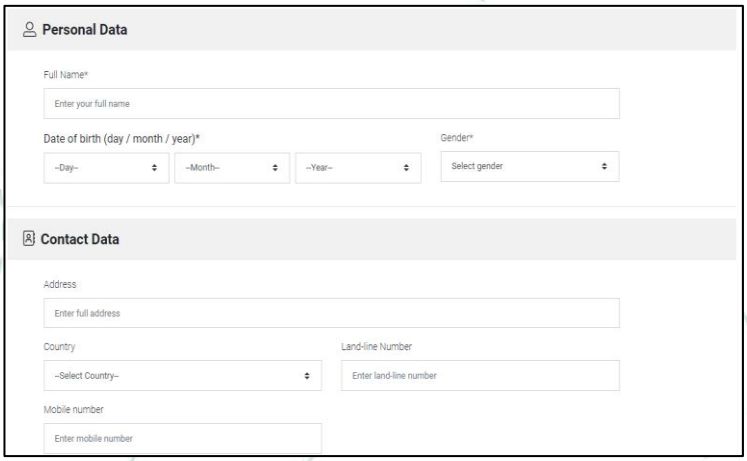
For the importer to register, he/she will need to access the platform through the following website: https://www.nafeza.gov.eg/en/register.

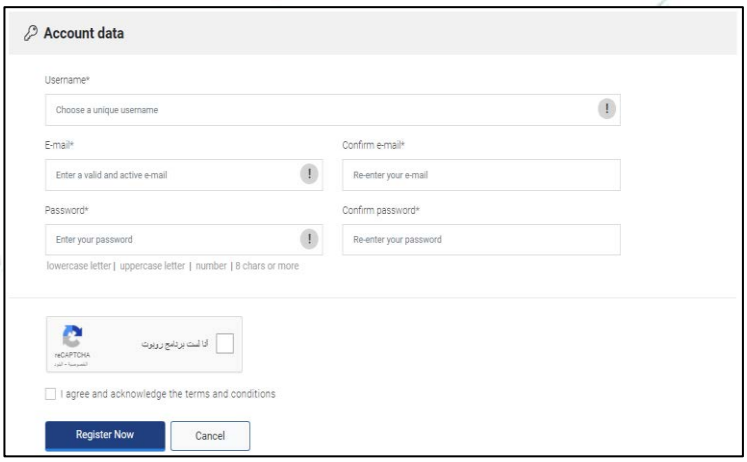
The registration steps are as follow:

1) The process of registration starts by selecting the type of account that suits the importer's activities either personal or commercial.

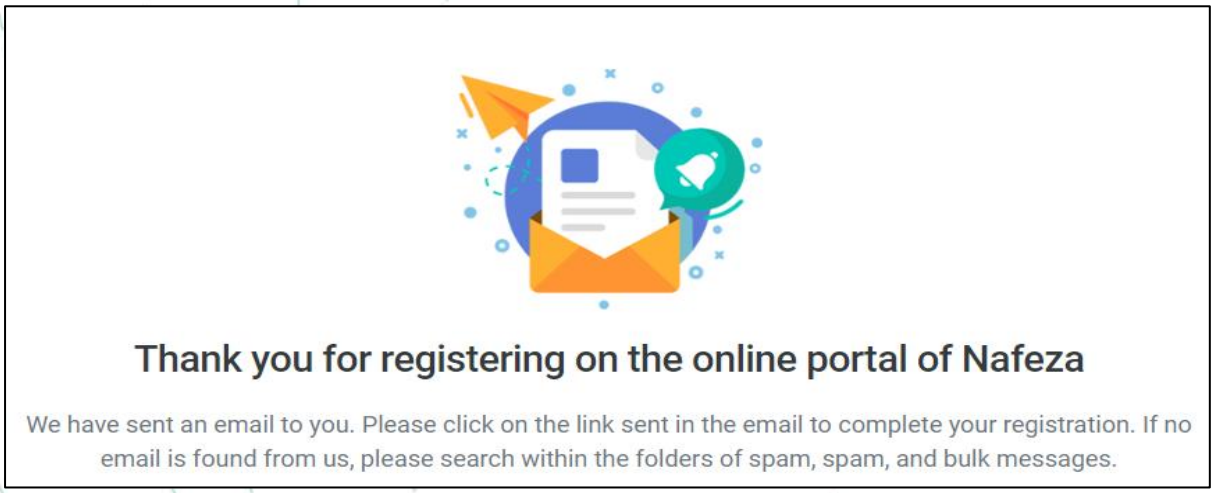


2) Having chosen the account, the importer now has to fil in some personal data **(Name, date of birth, gender)**, contact information **(Address, mobile and land line number, country)** as well as account data **(username, email, password)**





3) The final step in this regard is to verify your email address and then you'll receive an ID to log in to the portal and benefit from the packages of services available to users according to the type of account.

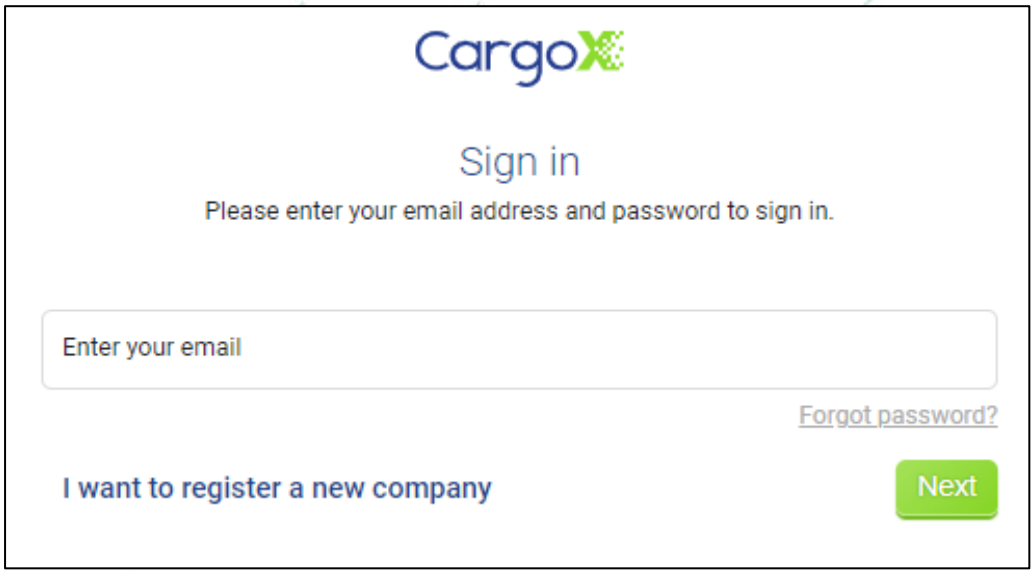


b) Registration on CargoX

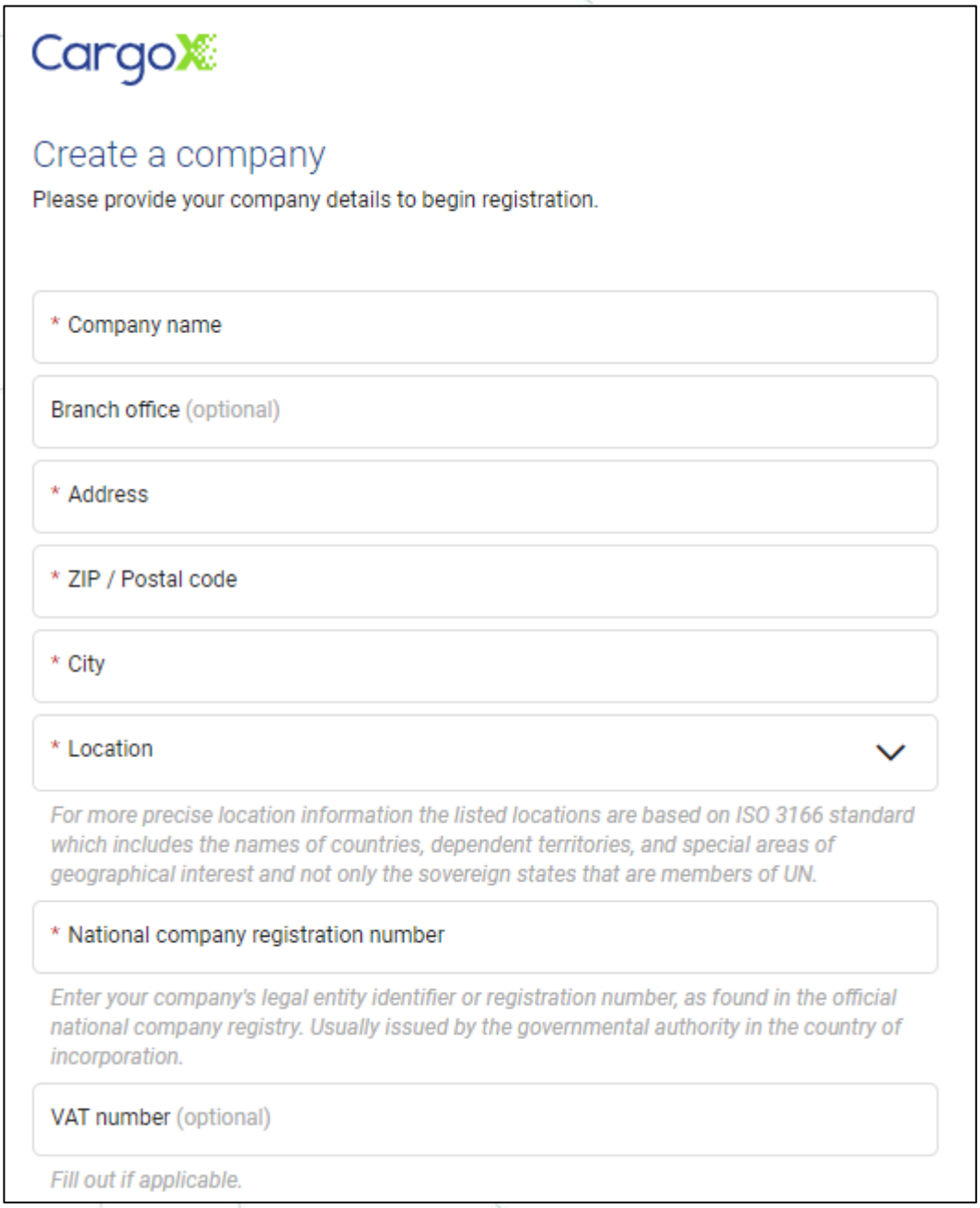
Registration on CargoX is a mandatory step for all foreign exporters. For the exporter to register, he/she will need to access the platform through the following website: https://cargox.digital/login.

The registration steps are as follow:

1) Create a free account on CargoX and then click ***I want to register a new company.***



2) The next step is filling the required information regarding the company as follows:



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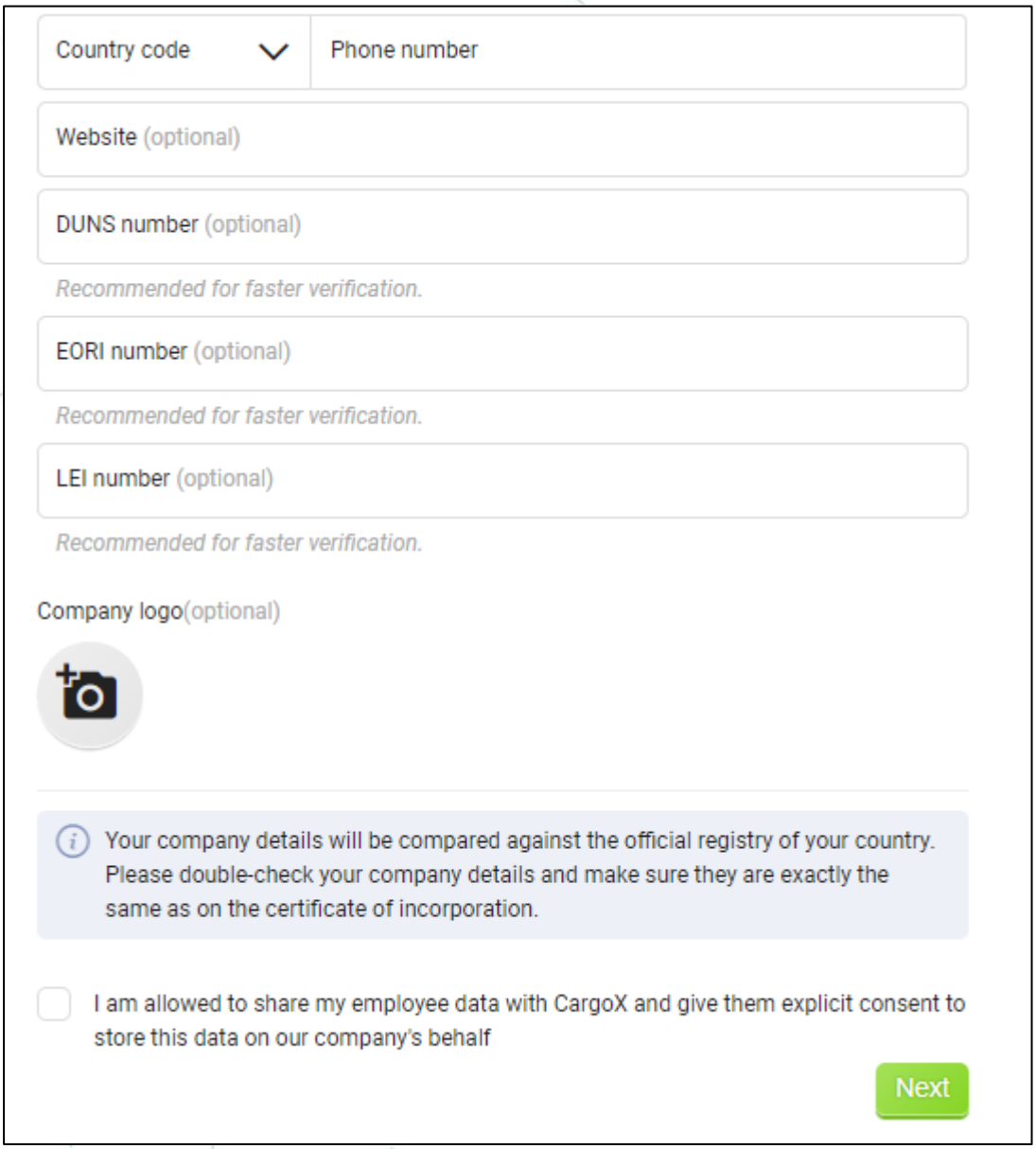
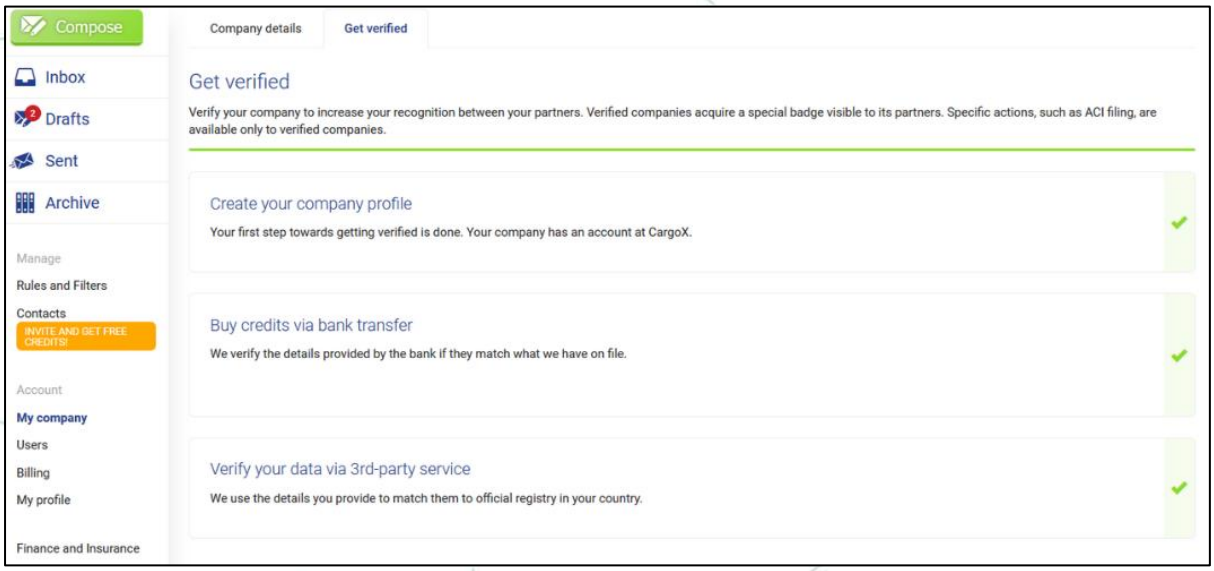


c) Account verification

Having created an account for your company, the next step is to get verified, this requires three actions:

- Create a company profile: This step is already done.
- Buying credit via bank transfer: This requires paying verification fees by transferring through the company's bank account.
- Lastly the system should now verify your data. This step can take up to 10 days (pending the money transfer)

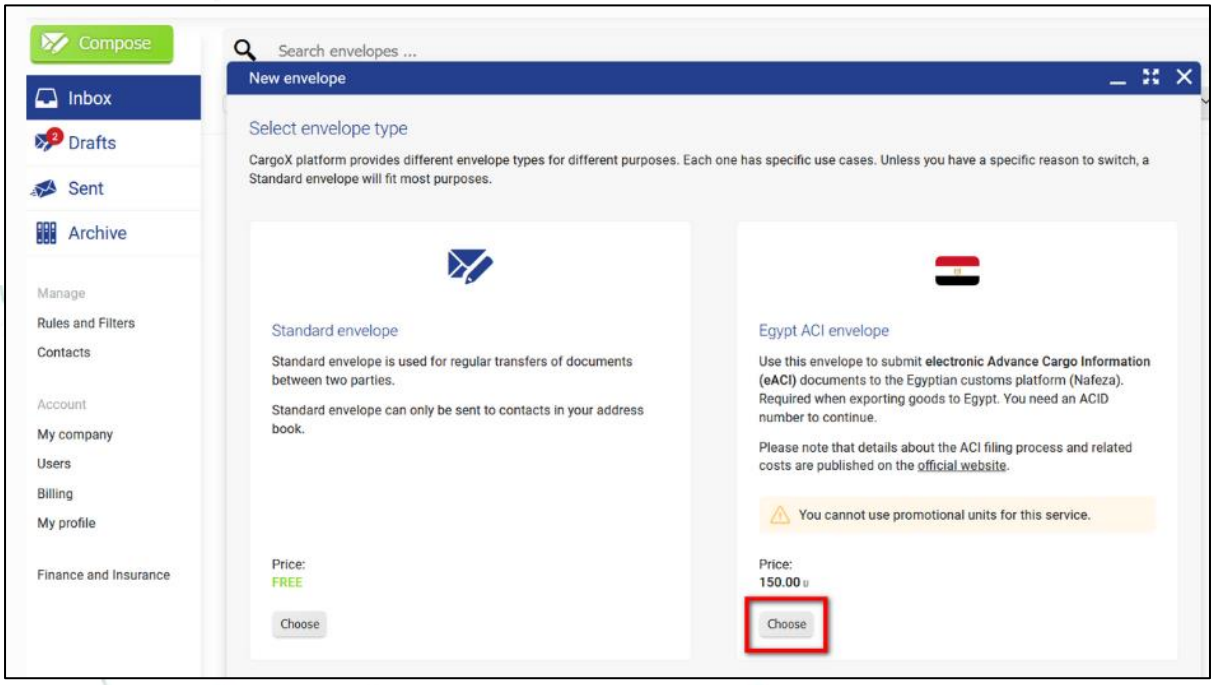
  Note: there is a help button where you can communicate the customer service through message chatting or email which is the fastest way.



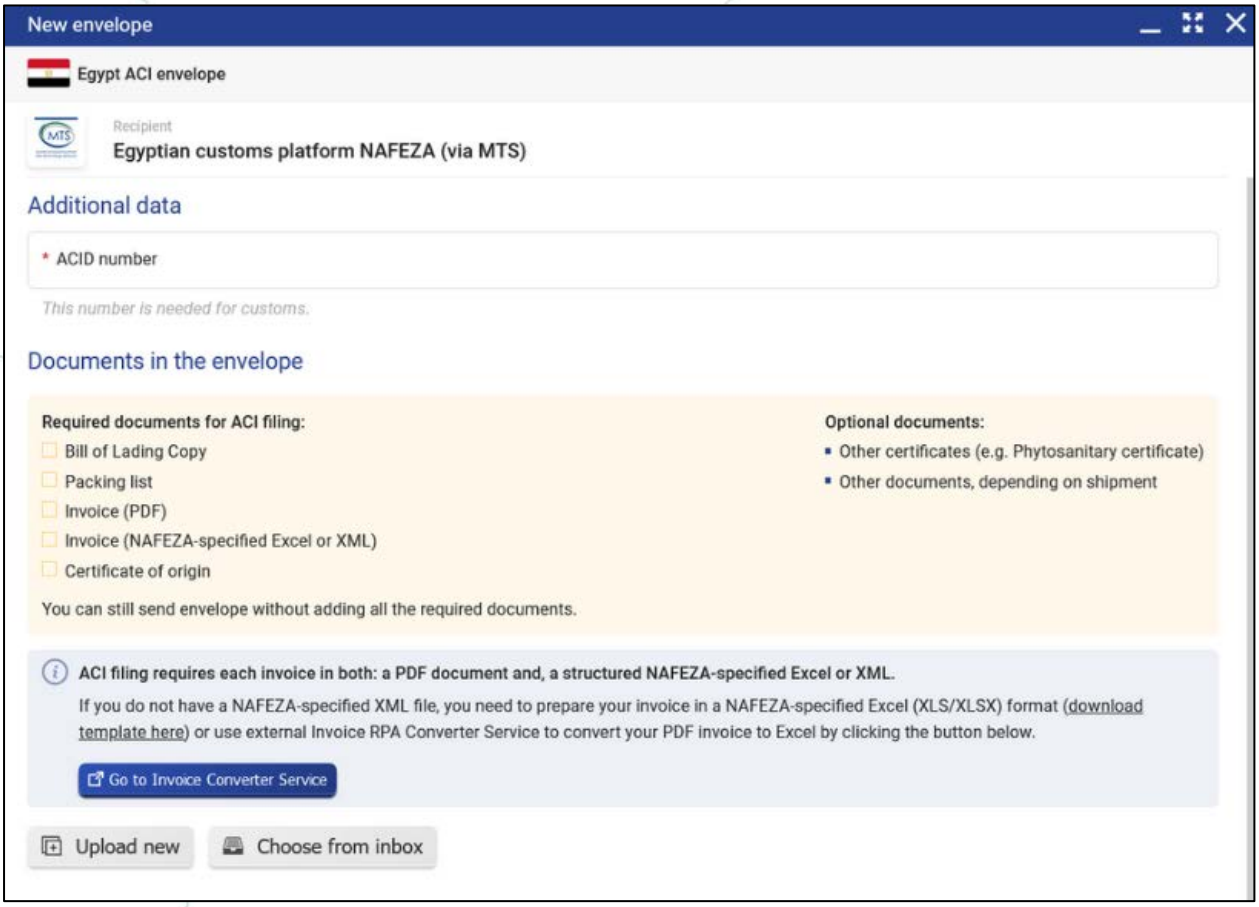
d) Composing and sending ACI filing

Now it is time to use ACI number sent by the importer to compose an envelope with the shipment documents and send it through CargoX to the importer.

- First click compose → then choose Egypt ACI envelope.



- A new envelope window would appear where you can click upload and choose from your device the required documents (invoice PDF and/or Nafeza-specified Excel, bill of lading copy, packing list, certificate of origin, other documents) to be uploaded and sent to the importer.



Once the ACI number is received from the Egyptian buyer, (which they will get from Nafeza after they register import shipment), you will use the CargoX Platform to electronically submit the required ACI documents to Egyptian customs.

Now what?

- Importer inputs the shipment data in the new ACI customs system.
- The customs authority issues the shipment identification number (ACID) within 48 hours.
- The customs authority notifies importer and exporter of the ACID.
- Exporter electronically transmits shipment documentation and data, ensuring ACID is referred to on all documentation.
- Importer certifies and acknowledges the correctness of the data sent by the exporter.
- Vessel is loaded with the shipment and departs the exporting country.
- Importer pays import taxes and fees.
- Vessel arrives at Egyptian port and shipment is offloaded.
- Joint committee at Egyptian port inspects shipment.

For an imported shipment to be accepted by the Egyptian customs authority, the shipment must have the following documents:

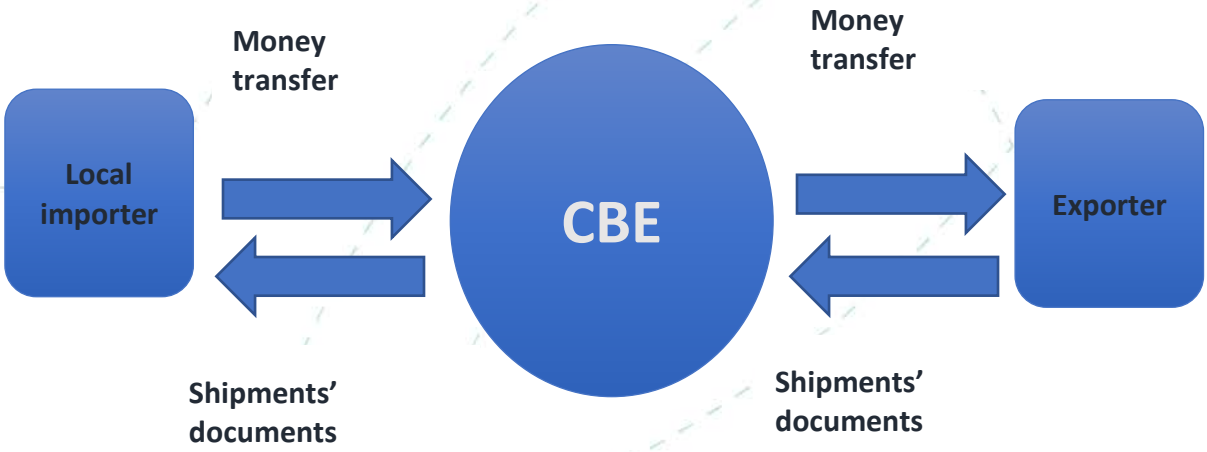
Table 2: List of Shipment Documents

Document	Description
Commercial Invoice	Two copies plus the original document are required. Legalization by the Egyptian consulate in the country of origin is required in most cases
Certificate of Origin	Two copies plus the original document are required. The Certificate of Origin must be authenticated by the Egyptian Consulate in the country of origin. Natural products are considered to originate in the country where the goods are extracted. The Certificate of Origin must bear a statement that the information given is true and correct to the best of the shipper's knowledge.
Packing List	A packing list may be required by the consignee and is recommended in most cases.
Bill of Lading	A bill of lading must show the name of the shipper, the address, and the number of bills of lading issued. There are no regulations specifying the form or number of bills of lading required for shipment. The number of bills of lading required depends upon the carrier.
Pro Forma Invoice	This is an invoice required by the importer for submission along with the import license. It must show the country where the goods were manufactured.
Letter of Credit L/Cs	A letter demanded by the Central Bank of Egypt "CBE" to allow the importing process to proceed.

2) Letter of credit

CBE announced that it must be the third-party linking exporters and local importers. Money and shipment documents must be transferred through the bank. This decision entered into force since March 2022.

Figure 1 Letter of Credit Process



The Central Bank of Egypt advises all banks operating in Egypt that L/Cs must be covered 100 percent in cash by the importer, except for some food items. This replaces the previous procedure whereby banks and their clients reached their own agreements and usually covered 10-20 percent of an L/C's value.

In general, the exporter may not ship the goods before the Egyptian bank has provided notification of the opening of an L/C. If the goods are shipped before the L/C is opened, the importer runs the risk of being fined up to a maximum value of the goods. If the importer does not bear the cost, then the exporter will have lost the value of such a shipment, and in the case of products with a limited shelf-life, the delay at customs can mean that even if the exporter (e.g., European company) wanted to take back the shipment, it is no longer of any use.

According to new regulations, the European exporter must submit the invoice as well as export documentation to his bank and the European bank should inform the Egyptian bank about a request to open the L/C. Import transactions are based on document collections.

There are some exemptions from L/Cs as follow:

- International companies that have branches in Egypt and import from their own company
- Shipments received by express mail
- Shipments up to the amount of 5 thousand US dollars or its equivalent in other currencies.
- Medicines, serums and related chemicals
- The following food commodities: tea, meat, poultry, fish, wheat, oil, milk powder, baby milk, beans, lentils, butter, corn.
- Imports of intermediary goods and raw materials.

3) Registration of factories at GOEIC

According to Decrees 43/2016 and 44/2019, all factories exporting to Egypt are required to register at GOEIC. Products exported designated for sale to final consumers will not be released from customs unless they are registered at GOEIC as per law 43 for the year 2016.

It is necessary to mention that since **15th of June 2022**, Egypt implemented a number of **new adjustments** to its registration system as follows:

- By the first of July each EU applicant that hasn't yet been registered or was suspended from registration in April 2022 must receive a written justification. This should include missing or expired documents form the applicants' side.
- Each EU applicant that submits these cancelled documents must be registered immediately while allowing them to resubmit the rest of the valid documents.
- After submission all applications shall be reviewed and confirmed immediately, and applicants shall receive a written proof of receipt including the date. For all complete files, a proof of payment of the registration fee, indicating the payer and the date of payment, will be considered proof of receipt of complete registration applications.
- A reasoned written decision shall be submitted within 15 calendar days from the applicants' submission of complete registration.
- Provide in writing via email any relevant information and change of their status to all registered, warned, suspended and cancelled EU companies.

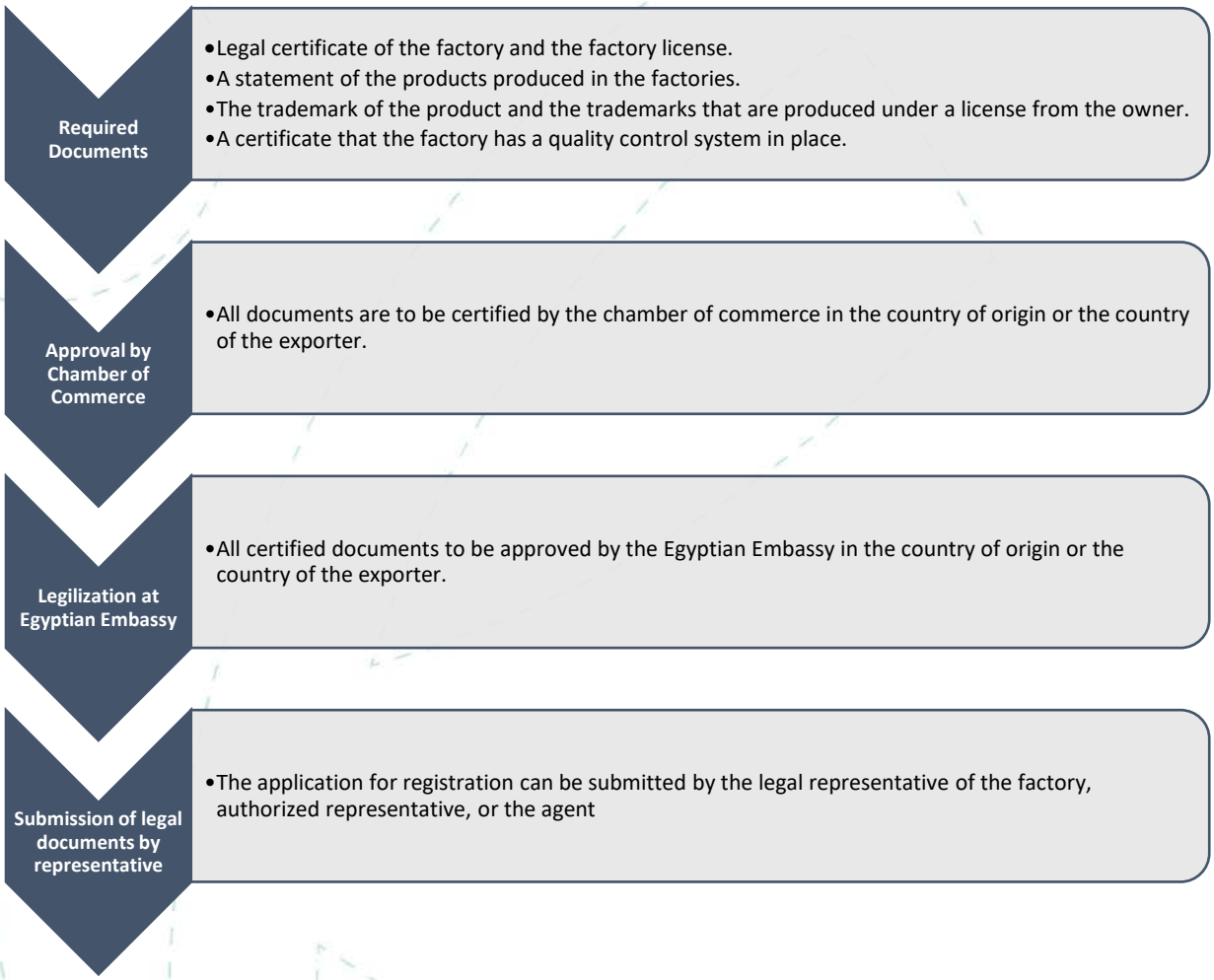
What are the documents required to register factories?

The application for registration can be submitted by the legal representative of the factory, authorized representative, or the agent, supported by the following certified documents:

i. Legal certificate of the factory and the factory license.
ii. A statement of the products produced in the factories.
iii. The trademark of the product and the trademarks that are produced under a license from the owner.
iv. A certificate that the factory has a quality control system in place issued by a body recognized in the European Union by International Laboratory Accreditation Cooperation (ILAC) or the International Accreditation Forum (IAF) or from an Egyptian or foreign governmental body approved by the Minister concerned with foreign trade.

The figure below summarizes the registration process for factories:

Figure 2: GOEIC registration for exporting factories



Note that: General Organization for Export and Import Control (GOEIC) of Egypt announced that as of 1 March a group of Dutch companies have been suspended from exporting to Egypt. GOEIC regularly publishes a list of companies that are Warned, Suspended and Cancelled, in relation to the validity of your quality certificate on which your registration as a company allowed to export to Egypt under Decree 43 of 2016.

Suspended companies are urged to work with their agents to update their certificates to be able to continue exporting. Failure to do so within a year will mean your company is cancelled and would have to renew the whole registration process under GOEIC.

The agriculture team has met with the new Interim Chairman of GOIEC, Eng. Essam Elnaggar. He informed the team that the quality certificates that are accepted by GOIEC are only the one under the Ministerial Decree No. 43. According to the decree (translated version), the quality certificates need to be approved by the international accreditation bodies ILAC or IAF.

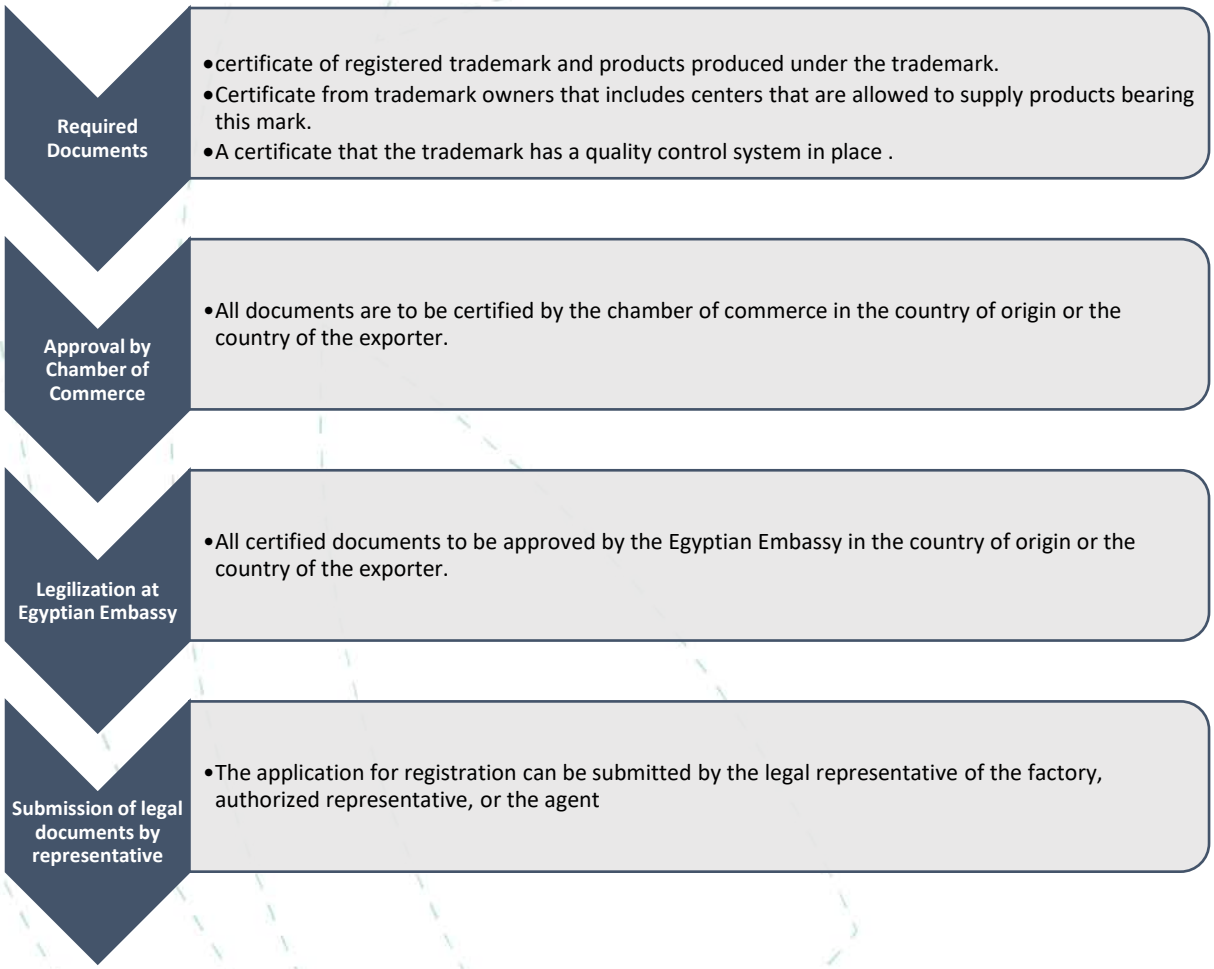
What are the documents required to register trademark?

The application for registration can be submitted by the legal representative of the trademark owner, authorized representative, or the agent, supported by the following certified documents:

i. certificate of registered trademark and products produced under the trademark.
ii. Certificate from trademark owners that includes centers that are allowed to supply products bearing this mark.
iii. A certificate that the trademark has a quality control system in place issued by a body recognized in the European Union by International Laboratory Accreditation Cooperation (ILAC) or the International Accreditation Forum (IAF) or from an Egyptian or foreign governmental body approved by the Minister concerned with foreign trade.

The figure below summarizes the registration process for trademark owners:

Figure 3: GOEIC registration for trademark owners



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Note: Multinational inspection companies can also support in the process of registration at GOEIC.

The registration is automatically approved. However, in case of doubt about the authenticity of the submitted documents, the registration will not take place until after verifying their authenticity. The entity may request from the applicant to inspect the company or factory to verify the authenticity of the documents, after the approval of the Minister concerned with foreign trade. It should be noted that until now registrations were practically finalized without conducting site visits.

The authority should give a response to exporter regarding the status of their registration within **15 working days**. However, in reality this may take longer time due to an issue of under capacity from their side.

The table below shows the list of food products that must register their exporting factories at GOEIC:

Table 3: List of food & agricultural products requiring GOEIC registration

Products that needs registration
Milk and milk products for retail sale in packages of 2 kg or less
Preserved and dried fruits for retail sale in packages of 2 kg or less
Oils and fats for retail sale in packages of 2 kg or less
Chocolate and food products containing cocoa for retail sale in packages of 2 kg or less
Sugar confectioneries
Pastries and food preparations of cereals, bread and bakery products
Fruit juices for retail sale in packages of 10 kg or less

Chapter Three

This chapter will focus on the provision of a detailed guide on exporting vegetable and potato seeds to Egypt and will also focus on analyzing the challenges which may encounter exporters throughout the process alongside shedding the light on some of the best practices used by exporting companies.

1) Importing vegetable seeds

The Netherlands is Egypt's second largest exporter of vegetable seeds. The potential of vegetable seeds relies in the fact that Egypt's vegetable seed market has evolved over the past two decades. It transformed from a public sector dominated, conventional seed market to now a private sector dominated hybrid seed market. FAS Cairo estimates the value of this market at $70-$80 million, with tomato, cucumber, squash, watermelon, melon, pepper, and green bean seed varieties being the main vegetable crops. With Egypt now adding over two million new consumers per annum, fresh vegetable consumption is on the rise. At the same time, Egypt is expanding its food processing industry's capabilities and increasing the number of modern retail outlets[1].

This section provides the detailed process of exporting and importing vegetable seeds.

a) Process

The process of exporting vegetable seeds to Egypt begins with the registration of seeds at the Agricultural Research Center. After that, the local importer must issue an import approval and import permit. Following that, the local importer will open the L/C and both the exporter and importer will register on the ACI system. Once all documents are approved, shipment will be shipped to Egypt, where inspection and customs will take place at the Customs Authority. The steps of the process are depicted in the below figure.

Figure 4 Process of exporting vegetable seeds

1) Registration of Seeds

What is the process of registration of seeds?

Seeds must be registered at the Agricultural Research Center to check their immunity against diseases (Plant Pathology Research Institute) and productivity of the variety.

[1] https://agriexchange.apeda.gov.in/MarketReport/Reports/Egypt_Planting_Seeds_Sector_Overview_A_Growing_Opportunity_for_U.S_Cairo_Egypt_3-14-2019.pdf

What are the documents needed for registration?

i. Certificate of registration in the country of origin
ii. Botanical characterization certificate
iii. Notarized certificate from the owner company
iv. Authorization from the exporter to the importer
v. Import approval
vi. Technical description
vii. Certificate of purity and germination

Registration certificate with fees amounting to ***5000 Egyptian pounds*** + ***1000 Egyptian pounds*** for annual renewal of the certificate.

If the type is already registered in Europe, then this process takes ***a year maximum***.

If not registered, then it takes ***two years.***

Why would a seed be rejected?

If seeds do not meet the standards (if productivity of one type of seeds is 25000 tons/feddan then less than this would not be registered).

2) Issuance of Import Approval

Import approval is issued by the Central Administration for Seed Testing and Certification. The Exporter must send a ***pro forma invoice*** with all types of seeds to be exported to be submitted by the local importer.

What are the documents needed?

i. Import License.
ii. Trading License.

Issuing the import approval requires ***one percent of the pro forma.***

The importer also needs to pay receiving fees of ***five percent of pro forma.***

Issuance of import approval can take up to ***a week***.

3) Issuance of Import Permit:

The importer needs to head to the Central Plant Quarantine to issue the import permit.

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Importer pays ***500 Egyptian pounds*** for each variety of seeds. For example, if three types of seeds are imported, the importer needs to issue three import permits, all costing 1500 EGP.

Renewal fees of the permit are ***250 Egyptian pounds.***

The permit is issued ***in the same day*** and is valid for ***three months.***

4) Nafeza and CargoX

Through the interlinkage between Nafeza and CargoX, the exporter needs to send the shipment's documents to the importer. This is when the importer reviews all the documents, and all the documents must be signed with the importer's electronic signature. **For more details on how to register on and Nafeza and CargoX check Chapter Two.**

5) Sample testing and inspection certificate

When the shipment arrives at the customs, both the Central administration for seed testing and certification, and the Central administration of Egyptian Plant Quarantine draw samples of the seeds and test for diseases, deficiencies, immunity, etc.

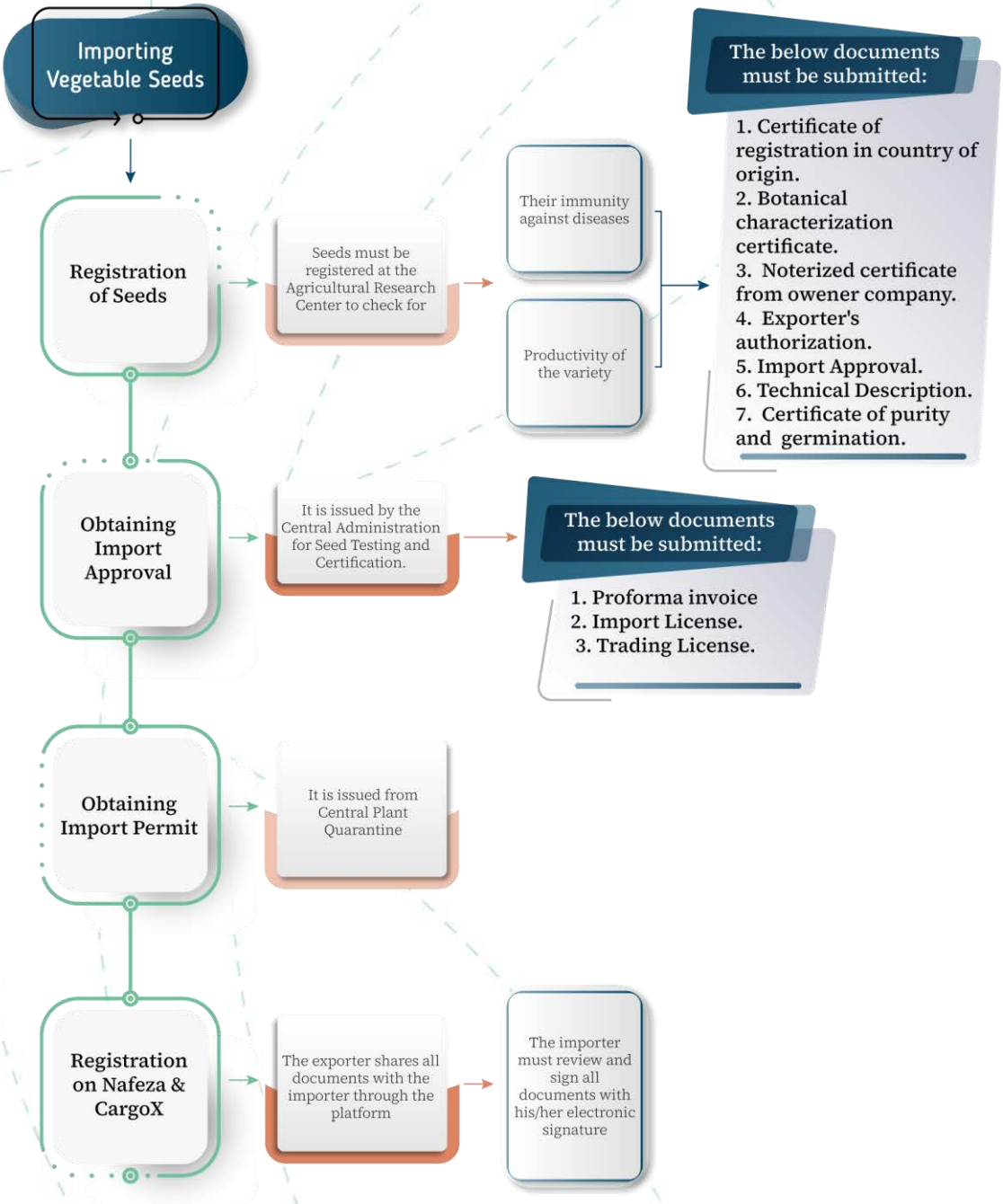
The shipment can be released once the test results reveals that it is suitable and can be safely used. If not, the shipment is returned to the exporter or executed.

b) Summary

The aim of this section is to summarize the overall process of importing vegetable seeds.

The below figure summarizes the process of importing vegetable seeds:

Figure 5 Summary of Process of Importing Vegetable Seeds



2) Importing seed potatoes

Egypt is one of the largest importers of seed potatoes. Between October 2021 and January 2022, Egypt imported 131 thousand tons of seed potatoes according to a report issued by the Egyptian Agriculture Quarantine.

This chapter focuses on identifying the requirements of importing seed potatoes to Egypt and provides a detailed guide on the process of exporting potatoes to Egypt. Moreover, the challenges which may encounter exporters and importers are assessed below.

a) General requirements

The imported seed potatoes shall meet the following conditions as per the ministerial decree No. (78) of 2019.

1) Grades

Potato seeds shall be of grade Elite "E" (or EEC2 according to EU standard) (Union Grade E), or its equivalent, or more superior. This is the grade authorized for handling in the EU or other potato seeds producing and exporting countries that are approved by the Egyptian Plant Quarantine – i.e., countries that are approved origins for importing seed potatoes.

2) Size

The size of potato tubers should be ranged between (28 mm - 55 mm). According to the natural grading of tubers size for all varieties and purposes (trade- private use-cultivation process and export), tubers shall be vigorous, fleshy and with no shrinkage. The packages shall be appropriate and homogeneous in its quantity and variety in the same lot.

Each package shall be accompanied with a fixed card stating the variety - grade - production date - country of origin and grower number. Sprout shall not exceed 2 mm - each package shall be free from varieties mix and free from tubers malformation.

3) Shipping conditions

Potato seeds shall be shipped onto means of transport fulfilling the conditions and specifications that ensure the safe arrival of the shipments and its compliance with the specifications.

b) Process

The process of exporting potato seeds to Egypt begins with the inspection of seeds in Netherlands by General Inspection Agency for seeds and seed potato. After that, seeds must be registered at the Ministry of Agriculture and Land Reclamation. Following that, the local importer must issue an import approval and import permit. There is an optional step which exporters and importers can agree on, which is the pre-shipment inspection that take place in Dutch ports. Once the shipment arrives in Egypt, they will be inspected at customs and then the shipment will be cleared.

Figure 6 Process of exporting seed potatoes

1) Inspection by Dutch General Inspection Agency for seeds and seed potato "NAK"

NAK conducts routinely lab tests through the season of growing potatoes in Netherlands (season: 120-150 days). It sends its inspectors to conduct lab testing first while the crop is in the soil, then, after harvesting, they conduct other tests to ensure that they follow European and Dutch standards.

NAK categorizes the potatoes into multiple categories, namely Super Elite "SE", Elite "E", and A/B. Elite is the category exported to Egypt.

2) Registration of seeds in the Ministry of Agriculture and Land Reclamation "MOLAR"

The varieties should be registered in the Ministry of Agriculture and Land Reclamation or recommended by the Committee of Varieties Registration.

However, it is permitted to import limited quantities of ***new unregistered varieties*** after the approval of the Agricultural Crops Seeds Committee. The indicated quantity approved should not exceed ***10 tons*** in the first year and ***50 tons*** in the two subsequent years, providing that necessary quarantine conditions for import potato seeds are met according to the enforced regulations.

It is allowed to import for private use or re-export of the production of the unregistered varieties after the supervision of the cultivations by the competent authorities.

How can the imported protect its registered imported variety from usage by other traders?

For the importer to guarantee his/her property rights over the registered variety, he/she must apply for what is called **"Protection"** at the Agriculture Crops Seeds Committee or at the Central Administration for Seed Testing and Certification depending on the type of the variety.

This "Protection" implies that it is strictly prohibited to trade the protected variety inside Egypt unless through the company which owns the registration.

3) Obtaining Import Approval and Import Permit

Importation of potato seeds shall be upon technical import approval issued by the Agricultural Crops Seeds Committee through a yearly application submitted by each importing entity to the Agricultural Crops Seeds Committee annually. The request should be submitted between ***mid-April and mid-May***, since the season for seed potatoes starts end of October till end of December or January.

What are the required documents?

i. The application shall include the quantity, variety, grade, and the country of origin.
ii. Registration Certificate.

iii. Reason for importing;
- ❖ If for trading: Company's documents must be submitted.
- ❖ If for private cultivation: Agricultural land acquisition documents must be submitted.

Then the importer applies for an import permit at the Egyptian Plant Quarantine "CAPQ". The import permit ensures that all varieties of potatoes seeds that are to be imported are compliant with CAPQ standards.

The phytosanitary import requirements of seed potatoes for cultivation purposes are shown in Annex 1.

4) Pre-shipment Inspection

This step is not a mandatory step in the process. However, sometimes local importers and exporters agree to conduct inspections of shipments before they are shipped to Egypt.

The process is as follows, the local importer requests a technical support committee, and a ministerial decree is issued in order to grant approvals for the committee to travel.

However, CAPQ is not officially obligated to inspect shipments in the country of origin and if the technical support committee did not approve the shipment, this does not imply that the shipment will be rejected in Egypt.

5) Shipment to Egypt and Customs Clearance

After obtaining all the above-mentioned approvals and documents, the exporter ships the shipment to Egypt. The exporter must ensure that potato seeds are loaded in a reefer container with the required temperature and humidity conditions to avoid any damage to the shipment during transportation.

What are the required documents for customs clearance?

For the shipment to be inspected and to be cleared by customs, the following documents should be submitted once the shipment arrives in Egypt:

i. Original Import Approval.
ii. Original phytosanitary certificate.
iii. Bill of Lading.
iv. Certificate of Origin.
v. Authorization letter.
vi. Proforma Invoice.
vii. Packing List.
viii. A copy of the identity card of the person concerned or who intends to address him with a valid power of attorney or bank authorization.
ix. A copy of the importer's record for the importing company.

Note: Potato seeds are among the high-risk categories and will be subjected to inspection at Customs.

The shipment will be inspected by CAPQ withing 48 hours of shipment arrival. Inspection of seed potatoes is very time sensitive because the more the seeds are subjected to weather and humidity factors, the higher the probability of developing different types of infections is.

What are the reasons of shipment refusal?

The refusal of potato seeds can happen for multiple reasons, and some of the reasons are shown below:

- If physical inspection detected chemical damages, brown rot or silver scurf, the shipment will be instantly refused without lab testing.
  - ❖ It should be noted that rejecting ***five percent*** of the imported quantity is within the acceptable average, however rejecting around ***25 percent*** of the imported quantity indicates a severe problem in the country of origin.
  - ❖ The total rejected quantity by CAPQ does not usually exceed ***2.5-3 percent*** of the imported quantity.
- If lab testing detected the existence of specific types of rots, or infection rates exceeded the percentages indicated in the table in Annex 1, the shipment will be rejected.

In the event of rejecting the shipment, CAPQ will officially inform the importer and **the National Plant Protection (NVWA) in the Netherlands.** Moreover, if the shipment is rejected, CAPQ assigns a second committee to further inspect the shipment. If the second committee also rejected the shipment, the importer can request a third-party committee to further inspect the shipment or experts from the country of origin. According to CAPQ, 99.9 percent of the time the third-party committee also rejected the shipment, once they detect brown rot even without lab testing.

c) Current and potential challenges

a) Restricting the duration of obtaining the import approval from mid-April to mid-May

Exporters believe that specifying the duration to apply for import approvals between May and April is very challenging. This is attributed to the fact that the crop yield is still unknown, and companies may still have no sufficient knowledge on what exactly will be exported and during April "the agriculture process may not even have started". Adding to that, if by October, the exporter wanted to add new categories depending on his yield, the import approval cannot be amended.

b) Lengthy process of registering new varieties

The process of registering new seed in the CAPQ is a relatively long process that takes around 7-8 months and can last up to a whole year. This in turn hinders the ability of the importers to keep up with the market trends and can constitute an obstacle regarding the agricultural process of the different crops depending on their seasonality.

c) Controversy over new mechanism for seed potato imports.

CAPQ is currently studying a proposal to conduct field visits in the countries of origin for inspection purposes during the 60^{th} or 70^{th} day of the potato cycle. This decision mainly stemmed from the fact that between 2018-2019, CAPQ received multiple complains from different farmers through the Central Committee for Agricultural Crops indicating the spread of viruses in their crops. Hence, CAPQ suggested such decision to ensure the safety of the

seeds imported and in order not to destruct the agricultural yield in Egypt. This decision is currently in the trail period.

On the other hand, Exporters strongly oppose such suggestion because they are afraid of the spread of contamination when inspectors conduct multiple visits to different fields. Moreover, they are complaining as they will have to incur additional costs to cover the stay of inspectors. EU member states such as the Netherlands and France insist their certification process is robust enough to minimize risk of virus in imports. A more significant risk is a lack local protocols on seed potato growing and certification of quality.

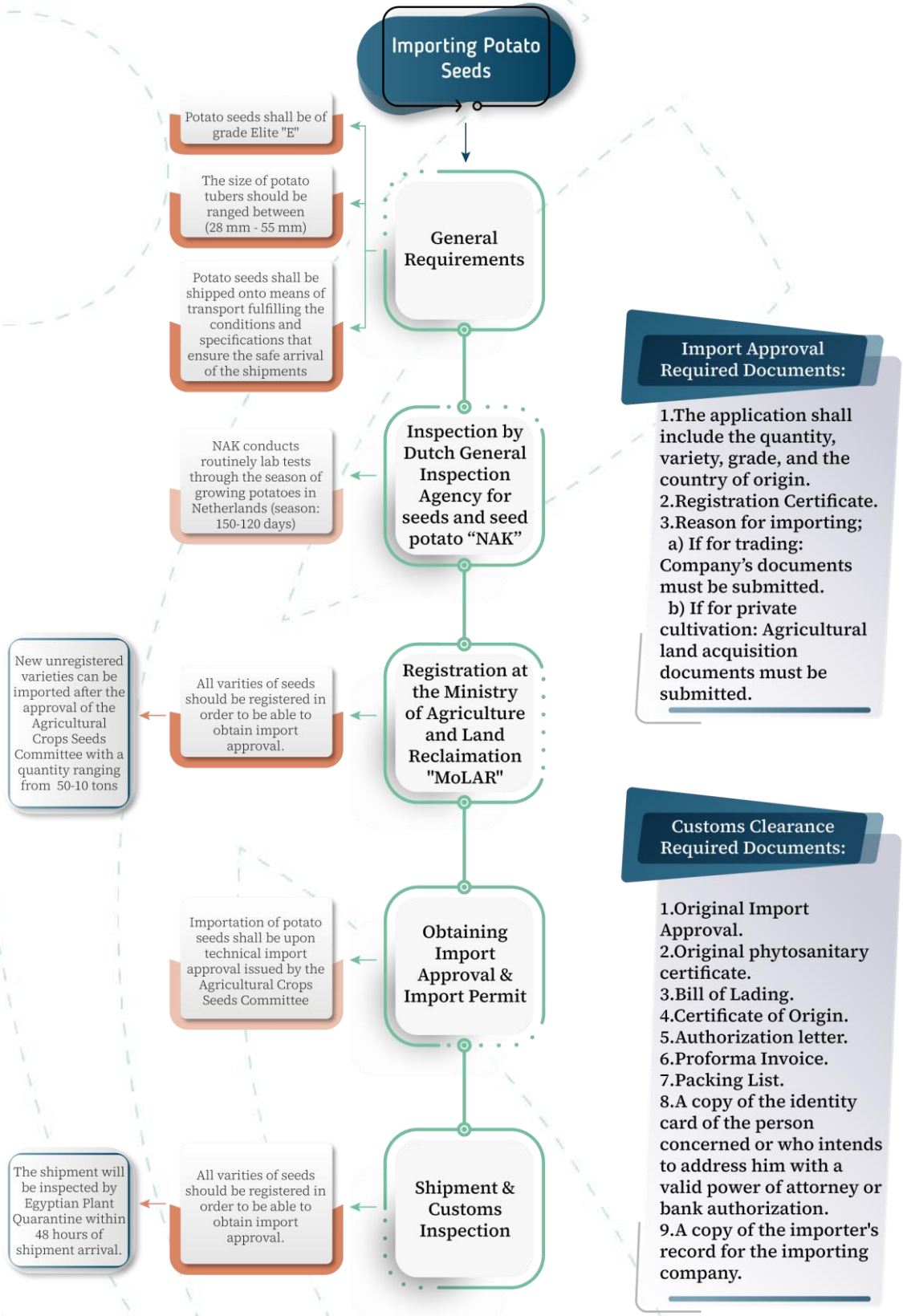
CAPQ assures that inspectors who will be sent to the Netherlands will be efficiently trained. And regarding the costs of inspectors' stay, it will be covered from the cost paid for import approval – i.e., CAPQ will take one Egyptian pound on each ton from the fees paid for the import approval. This proves that no additional costs will be incurred by the importer or the exporter.

d) Summary

The aim of this section is to summarize the overall process of importing potato seeds.

The below figure summarizes the process of importing potato seeds:

Figure 7 Summary of Process of Importing Potato Seeds



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Chapter Four

1) Importing crop protection products

The aim of this section is to provide an overview of the process that should be followed by Dutch exporters and Egyptian importers of pesticides. Moreover, challenges across different steps of the process will be assessed alongside some of the best practices that companies used to overcome such challenges.

a) Process

There are different government entities involved in the process of trade in crop protection products – i.e., pesticides. Two of the highly important entities are shown below:

- The Agriculture Pesticides Committee "APC" located in Ministry of Agriculture.
  - ❖ It implements all the rules and regulations guiding the registration process in Egypt.
- The Central Laboratory of Pesticides

1) Official Trail Program "OTP"

This is a mandatory step even if the formulation/ compound is registered in EU. To register the pesticide, the formula must be tested in the field, and such tests are conducted in specialized institutions.

What are the entities responsible for testing and certification?

- For trails related to "Pest Control Compound" the trails are conducted in **Researches Institute of Plants Protection.**
- **For** plant pathology related to fungicide and nematicides, the trails are conducted in **Agriculture Research Institute**,
- For herbicide, trails are conducted in the **"Central Weed Research Lab" located in Agriculture Research Institute"**

- laboratory analysis is conducted in the Central Laboratory of Pesticides.

  - ❖ To start the registration process, an application must be submitted the Agriculture Pesticide rapporteur or whoever is authorized to act on his behalf along with the primary dossier of technical data and a receipt indicating the payment of the registration fee for each technical grade or formulated pesticide for which registration is requested.

What are the documents required for Dossier submission?

i. Label and Certificate of registration in the country-of-origin (Legalized Doc.)
   - ❖ Formulation and active substances should be registered in one of (EPA"US" – EU – Japan – Australia – Canada) to be accepted in Egypt.

Note: It should be noted that the country of origin and the country of manufacturing must be the same. The government implemented that law in order to ensure that the product being exported to Egypt is actively used in the exporting country to ensure safety and

quality standards. Even if the product is registered in another EU Country, this will not be accepted, it must be manufactured in the country of Origin.

ii. Authorization letter (Legalized document).
iii. Letter of packing quality guarantee (original document enclosed to the Dossier/Legalized).
iv. Methods of analysis (Soft copy).
v. Toxicological Studies - Acute toxicity studies (Soft copy).
vi. Toxicological Studies - Chronic toxicity studies for the active ingredients (Soft copy).
vii. Ecotoxicological Studies - Environmental toxicity studies for the formulation – Risk assessment (Soft copy).
viii. Residues studies (Soft copy).
ix. Classification in EC/EPA (Soft copy).
x. MSDS for formulation (Soft copy).
xi. Certificate of composition CoC and Certificate of Analysis CoA (Soft copy).
xii. Minimum residual limit MRL (Soft copy).
xiii. Fingerprint and impurities analysis from Central Agriculture Pesticide Laboratory (original document enclosed to the Dossier).
xiv. Bio-assessment certificate (Recommendation sheets) (Soft copy).
xv. PHI certificate/Fees (Soft copy).
xvi. Payments of official trials program (Soft copy).
xvii. Official trial program documents (Soft copy).
xviii. Technical data sheet (TDS) (Soft copy).
xix. Manufacturing declaration (Legalized Doc.).
xx. Manufacturing sites documents – (Letter of Manufacture of Supply and Manufacturing license) (Legalized Doc.).

The responsible for trails books the field and assigns those who will be responsible for testing the formulation. If the company applied for registration in Q2 2022, results will be delivered in Q2/3 2023. And then in Q2 23 the company applies for the second year of trails. In the second year, the certificate of origin, composition or analysis are not submitted. The company must submit the passing certificate of the formulation in the tests in the first year and the success of the lab in the first year. **(Trail and Lab Results).**

Note: There are 2 seasons (Summer & Winter) some formulations are tested on summer crops and others on winter crops. Winter is submitted in Q2 and summer in Q3.

When APC accepts primary dossier of technical data of the pesticide for which a registration application is submitted, the applicant must provide samples of the active ingredient(s) and the major impurities that may co-exist with it from accredited sources for use as reference standards and any other substances required for analysis. The applicant must also submit - free of charge- samples, in quantities determined by APC, for analyzing and experimenting the pesticide for which a registration application is submitted. A custom release "free of charge" of the required samples is issued based on an official letter signed by the APC Rapporteur or whoever is authorized to act on his behalf.

What are the documents required to obtain technical approvals for importing samples for testing?

i. A copy of initial invoice.
ii. The local company must have a pilot program or have a pesticide testing plant to import.

What are the documents required to release samples of pesticides from customs?

i. The company's letter signed by the experimenting official in charge of approving the required amount of pesticide.
ii. Bill of lading including the required pesticides.
iii. Invoice.
iv. Official Trail Program (OTP).

Note: If the formulation is accepted and registered and after that the company decided to add another recommendation such as to add that it can be used on other crops, it will need to be tested again for 2 years, but the company do no resubmit the dossier, it only updates the registration certificate and add the new recommendation.

Figure 8: OTP Sheet

البرنامج التجريبي لموسم (2020/2021) / (صيفى)
مبيد (حشرى)
المقدم للتجريب
(إعادة تقييم)

الشركة المحلية:
رقم التسجيل المحلى:

الاسم التجاري للمستحضر	الاسم الشائع	نوع المستحضر	تركيز المادة الفعالة	المحصول	الآفة	معدل الاستخدام	موقف المركب في EPA , EC		الشركة المحلية	إنتاج المستحضر			الموقف من التجريب		
							EC	EPA		الشركة المنتجة للخام	الشركة المنتجة للخام	مستورد الشركة المنتجة للمستحضر وعنوانها	أولى ثانية	إعادة تقييم بداية السنة الثالثة	إعادة تقييم بداية السنة السادسة
Trade Name	Active Substance	SC – EC .. etc	-- %	العنب	دودة ثمار العنب	400 سم3/فدان	Approved	Active					إعادة تقييم		
				الطماطم	المن	40 سم3/فدان	Approved	Active					سنة أولى		
				الكرنب	المن	30 سم3/فدان	Approved	Active					إنتظار نتائج سنة أولى		

توقيع مسئول الشركة | تاريخ تقديم البرنامج | توقيع مراجع البيانات | توقيع مسئول التجريب | إعتماد اللجنة

The below figure shows the cycle of OTP and registration process:

Figure 9: OTP and registration process

1st Year OTP Requirements:
GAP/Protocol for best practices
CoC – CoA – CoO – EPA/EC Approval
TDS - OTP fess – Samples
OTP sheet and application form

2nd Year OTP + OTP results Requirements:
OTP sheet – Fees – Samples – 1st year OTP analysis certificate (results) + submission for PHI analysis and fingerprint studies for proper preparation of the registration dossier

Dossier Submission

Reevaluation Requirements:
OTP sheet – Fees – Samples – soft copy from COA-COR
N.B: PHI and Fingerprint analysis submission in case of re-registration

Note: Re-evaluation is for the registered products, this process to re-evaluate the product efficacy by conducting the existing GAPs for official trails and CP product for re-analysis this just for one year OTP).

APC issues pesticide registration certificates for the technical grade or formulated pesticide valid for ***six renewable years*** as of the issuing date, after the completion of all the necessary requirements of registration. Efficacy of the formulated pesticide should be re-assessed ***at the beginning of the third and sixth years*** as of the date of issuing the registration certificate. The certificate will be renewed upon the request of the concerned person, provided that the conditions stipulated in the present decree are still applicable to the technical grade or the formulated pesticide.

The preparation for registration renewal should start a year in advance "in the 5th year"**. The required documents to renew registration are shown below:**

What are the documents required for registration renewal?

i. Country-of-origin
ii. Manufacturing license
iii. Manufacturing declaration
iv. Results of re-evaluation

2) Receive bio-assessment certificate

Upon passing field experimentation, APC issues the “Biological Assessment Approval Certificate", signed by the APC Rapporteur or whoever is authorized to act on his behalf. The certificate is then endorsed by the APC Chairman. The certificate will be issued in duplicate: one for the APC record, and the other will be securely handed over to the concerned person.

Bio-assessment Certificate is valid for ***3 years*** for each recommendation. Each recommendation must be submitted for re-evaluation ***every two years*** to receive new results in the third.

Figure 10 Sample of Bio-Assessment Certificate

Arab Republic of Egypt
Ministry of Agriculture & Land Reclamation
Agricultural Pesticide Committee (APC)

جمهورية مصر العربية
وزارة الزراعة واستصلاح الأراضي
لجنة مبيدات الآفات الزراعية

مسلسل (...../.....)

نموذج رقم (٨): شهادة إجتياز إختبار التقييم الحيوى

إسم الشركة المحلية:		إسم الشركة المنتجة:	

الإسم التجارى	الإسم النشائع	المحصول	الآفة/ المرض/ الحشائش	معدل الإستخدام	تاريخ اجتياز إختبار التقييم الحيوى	نوع التوصية

- مدة صلاحية الشهادة ثلاث سنوات من أقدم تاريخ لاجتياز اختبار التقييم الحيوى أو إنتهاء صلاحية شهادة التسجيل أيهما أقرب.
- تاريخ انتهاء هذه الشهادة: ../../....

أمين
لجنة مبيدات الآفات الزراعية

يعتمد،،،،

رئيس
لجنة مبيدات الآفات الزراعية

3) *Obtaining trade license for agriculture pesticides*

The importer must submit a request to obtain license for trade in agricultural pesticides to the Agricultural Pesticides Committee.

What are the documents that must be submitted by the importer?

i. Commercial register.
ii. A copy of tax card.
iii. A copy of the license issued by the local unit to open the shop/warehouse.

iv. A certificate from the Syndicate of Agricultural Professions stating that the person responsible for the warehouse has been registered in the Register of Agricultural Engineers.
v. A valid certificate for the person responsible for the warehouse that he/she successfully passed the training course specified by the committee.
vi. Insurance certificate for the responsible agricultural engineer.
vii. An engineering drawing for the site approved by a union engineer.
viii. A copy of the lease or ownership contract registered in the real estate registry.
ix. The receipt indicating the payment of the prescribed inspection expenses in the name of the Pesticide Analysis and Evaluation Unit at the Central Laboratory for Pesticides.
x. A government postal order in the amount of one pound in the name of the Central Laboratory for Pesticides.

4) Obtaining official label

What are the documents required to obtain the approved label?

i. A letter from the company requesting the label, indicating the size of the required packages
ii. A valid OTP pass certificate
iii. Valid registration certificate
iv. A valid pesticide trade license for the importing company.
v. The period of the harvest from the Central Laboratory for Pesticides and when it is not issued, it is possible to rely on the pre-harvest period before the temporary and written in the registration certificate
vi. If the registered pesticide has a special drug, the antidote is provided in case of poisoning (ANTIDOT).

In case the pesticide will need to be repacked when it arrives to Egypt:

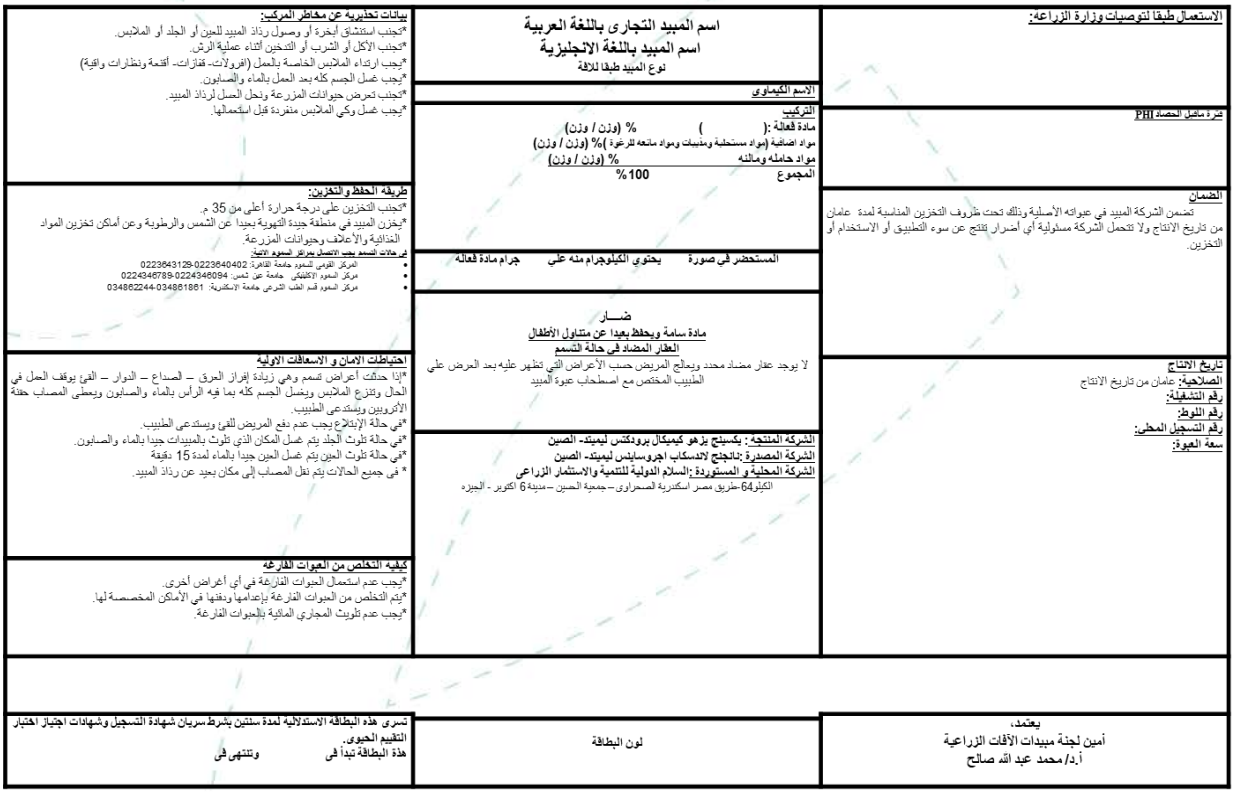
What are the required documents?

i. The approval of the producing company to re-pack its formulation in one of the factories in Egypt and to ensure the chemical and natural specifications and quality of the packaging after packing.
ii. The approval of the local factory to do the repacking.
iii. Local factory license (If the factory is in a free zone area, it can be exempted from submitting the factory license)

Note: In case of adding a logo whether for the local or producing company, the company's logo must be presented on a flash drive or CD.

After submitting the documents, the label should be written following the below format:

Figure 11 Label Sample



الاستعمال طبقا لتوصيات وزارة الزراعة:

اسم المبيد التجارى باللغة العربية
اسم المبيد باللغة الانجليزية
نوع المبيد طبقا للافة

بيانات تحذيرية عن مخاطر المركب:
*تجنب استنشاق أبخرة أو رصول رذاذ المبيد للعين أو الجلد أو الملابس.
*تجنب الأكل أو الشرب أو التدخين أثناء عملية الرش.
*يجب ارتداء الملابس الخاصة بالعمل (افرولات- قفازات- أقنعة ونظارات واقية)
*يجب غسل الجسم كله بعد العمل بالماء والصابون.
*تجنب تعرض حيوانات المزرعة ودخل العسل لرذاذ المبيد.
*يجب غسل وكي الملابس منفردة قبل استعمالها.

الاسم الكيماوي

التركيب
مادة فعالة :( ) % (وزن / وزن)
مواد اضافية (مواد مستحلبة ومذيبات ومواد ماتعه للرغوة)% (وزن / وزن)
مواد حامله ومالئه % (وزن / وزن)
المجموع 100 %

تدرة مائل الحصاد PH

الضمان
تضمن الشركة المبيد في عبواته الأصلية وذلك تحت ظروف التخزين المناسبة لمدة عامان من تاريخ الانتاج ولا تتحمل الشركة مسئولية أي أضرار تنتج عن سوء التطبيق أو الاستخدام أو التخزين.

طريقه الحفظ والتخزين:
*تجنب التخزين على درجة حرارة أعلى من 35 م.
*يخزن المبيد في منطقة جيدة التهوية بعيدا عن الشمس والرطوبة وعن أماكن تخزين المواد الغذائية والأعلاف وحيوانات المزرعة.

في حالات التسمم يجب الاتصال بمراكز السموم الاتية:
- المركز القومى للسموم جامعة القاهرة: 02223640402-02223634129
- مركز السموم الاكلينيكى جامعة عين شمس: 02243467894-02243463094
- مركز السموم قسم الطب الشرعى جامعة الاسكندرية: 034862244-034861861

المستحضر فى صورة يحتوى الكيلوجرام منه على جرام مادة فعاله

ضـــار
مادة سامة ويحفظ بعيدا عن متناول الأطفال
العقار المضاد فى حالة التسمم
لا يوجد عقار مضاد محدد ويعالج المريض حسب الأعراض التي تظهر عليه بعد العرض على الطبيب المختص مع اصطحاب عبوة المبيد

تاريخ الانتاج
الصلاحية: عامان من تاريخ الانتاج
رقم التشغيلة:
رقم اللوط:
رقم التسجيل المحلى:
سعة العبوة:

احتياطات الامان و الاسعافات الاولية
*إذا حدثت أعراض تسمم وهي زيادة إفراز العرق – لصداع – الدوار – القيء يوقف العمل في الحال وتنزع الملابس ويغسل الجسم كله بما فيه الرأس بالماء والصابون ويعطى المصاب حقنة الأتروبين ويستدعى الطبيب.
*في حالة الإبتلاع يجب عدم دفع المريض للقئ ويستدعى الطبيب.
*في حالة تلوث الجلد يتم غسل المكان الذي تلوث بالمبيدات جيدا بالماء والصابون.
*في حالة تلوث العين يتم غسل العين جيدا بالماء لمدة 15 دقيقة
* في جميع الحالات يتم نقل المصاب إلى مكان بعيد عن رذاذ المبيد.

الشركة المنتجة: يكسيلج بزهو كيميكال بروداكتس ليميتد- الصين
الشركة المصدرة: تيانجج لاندسكاب اجروسايدس ليميتد- الصين
الشركة المحلية و المستوردة: السلام الدولية للتنمية والاستثمار الزراعى
الكيلو64-طريق مصر اسكندرية الصحراوى – جمعية الصين – مدينة 6 اكتوبر - الجيزه

كيفيه التخلص من العبوات الفارغه
*يجب عدم استعمال العبوات الفارغة في أي أغراض أخرى.
*يتم التخلص من العبوات الفارغة بإعدامها ودفنها في الأماكن المخصصة لها.
*يجب عدم تلويث المجاري المائية بالعبوات الفارغة.

يعتمد،
أمين لجنة مبيدات الآفات الزراعية
أ.د/ محمد عبد الله صالح

لون البطاقة

تسرى هذه البطاقة الاستدلالية لمدة سنتين بشرط سريان شهادة التسجيل وشهادات اجتياز اختبار التقييم الحيوى.
هذه البطاقة تبدأ فى وتنتهى فى

Final steps from the Pesticides Committee to receive the label:

- The label is sent to the experimenting official to review the recommendation in terms of the type of pest, the rate of use, the crop to which the pesticide is applied, and the method of application.
- It is approved by Secretary of the Pesticides Committee and stamped with the eagle seal and handed over to the company after paying the recurring expenses.

The label is valid for ***two years***.

5) Obtaining technical approvals

The importer must request technical approval for the Import of agricultural pesticides.

It should be noted that all documents must be stamped with company seal.

What are the documents required for technical approvals for importing formulations?

i. Copy of formulation registration certificate.
ii. Copy of formulation label.
iii. Copy of proforma invoice.
iv. Copy of OTP analysis certificate.

v. Copy of the traders' license of the local company (warehouse).
vi. Copy of clearance license for the last shipment of the formulation.
vii. Copy of the route of the last shipment of the formulation.
viii. Copy of Agricultural Pesticide Lab's inspection of the Warehouse.

What are the documents required for technical approvals for importing pesticides raw materials?

i. Copy of registration certificate of the raw material.
ii. Copy of formulation registration certificate.
iii. Copy of formulation label.
iv. Copy of proforma invoice from producing company.
v. Copy of OTP analysis certificate.
vi. Copy of the traders' license of the local company (warehouse).
vii. Copy of clearance license for the last shipment of the formulation.
viii. Copy of the route of the last shipment of the formulation.
ix. Copy of Agricultural Pesticide Lab's inspection of the Warehouse.
x. Copy of registration of local factory.

What are the documents required for technical approvals for importing pesticides additives?

i. Copy of registration certificate of the raw material.
ii. Copy of formulation registration certificate.
iii. Copy of formulation label.
iv. Copy of proforma invoice from producing company.
v. Copy of OTP analysis certificate.
vi. Copy of the traders' license of the local company (warehouse).
vii. Copy of clearance license for the last shipment of the formulation.
viii. Copy of the route of the last shipment of the formulation.
ix. Copy of Agricultural Pesticide Lab's inspection of the Warehouse.
x. Copy of registration of local factory.

What are the documents required for technical approvals for importing pesticides for personal use?

i. Certified approval of the production company or importing country to use the product in the farm in Egypt and exporting the harvest to it.
ii. Copy of preliminary commercial invoice.
iii. Copy of label, showing sentence (no trade or usage).
iv. Copy of Total Dissolved Solids "TDS" for the formulation intended for usage.
v. Declaration of local companies for private use of formulation in farms in Egypt.

In case of repackaging, the required quantity must be shown in the form of the request for Technical Approval for import of total quantity of agricultural pesticide + Size of the pesticide

that will be repacked + The name of the repacking factory (in case of more than one package, each package shall be ordered with mentioned total quantity of the packaging).

0.002 percent of preliminary commercial invoice must be paid to the Ministry's treasury.

0.005 percent of preliminary commercial invoice must be paid to the Principal Bank for Development & Agricultural Credit located in El Dokki.

100 Egyptian pounds must be paid to the Ministry's treasury.

For renewal, application must be submitted to the Agricultural Pesticide Committee. ***0.002 percent*** of preliminary commercial invoice must be paid to the Ministry's treasury.

Expected time to receive technical approval from Agricultural Pesticide Committee is ***One month.***

Technical approval is valid ***6 months*** from the date of issuance.

After obtaining the original technical approval, the document is copied at least 5 copies to complete the rest of the procedures. The customs clearance is given a copy + initial invoice to extract a customs certificate from the shipping port. In case of repacking the pesticide, a customs certificate + request for dispatch from port to port.

After obtaining the Bank's papers, original documents will be handed over to the Customs Clerk for completion of the rest of the procedures for final release of the shipment.

6) ***Exports ship the shipment to Egypt***
7) ***Obtaining Sample Withdrawal File for inspection and analysis***

The file is submitted to the Central Laboratory of Pesticides in the Pesticides Control Department after obtaining technical approval and after ensuring that the container is unloaded in the shipping port, as the laboratory sends an inspection committee after 2 days from the submission of application. This is crucial because if the committee arrived at the port and the shipment is not yet delivered, the committee representative will issue a record indicating the absence of the shipment. Thus, inspection will be rescheduled at a later date, which will impose additional costs on the company in order to keep the shipment at the port until the upcoming inspection date.

The following table shows all the documents that must be submitted in the file:

Table 4: Documents required for sample withdrawal file

Required Documents	Pesticide (Final Product)	Repackaging
A transparent file is submitted and should be divided into three sections		
Section One		
Submitting original certificate of technical approval+ copy of technical approval+ copy of proforma invoice	✓	✓
A declaration indicating that all information provided is correct (This is submitted with importing company's documents and must be stamped by the company's stamp)	✓	✓
Signed commitment to bring imports representative during sample withdrawal process (This is submitted with importing company's documents and must be stamped by the company's seal)	✓	✓
Request for the analysis of the shipment of agricultural pesticides (This is submitted with importing company's documents and must be stamped by the company's seal)	✓	✓
Request for an inspection committee (This is submitted with importing company's documents and must be stamped by the company's seal)	✓	✓
Section Two		
Copy of pesticide registration certificate	✓	✓
Copy of pesticide label	✓	✓

Copy of OTP analysis certificate	✓	✓
Pre-harvest certificates	✓	✓
Copy of the traders' license of the local company	✓	✓
In case of previous importation of the pesticide: ▪ Copy of release license for the last shipment of the formulation. ▪ Copy of the route of the last shipment of the formulation.	✓	✓
Section Three **Bank Documents (The bank in which the importer opens the letter of credit)** The bank will contact the person concerned when the products are shipped from the country of origin to obtain the original documents. A copy of the bank papers is attached to the sample withdrawal file and the customs broker is given the original documents		
Commercial invoice	✓	✓
Bill of lading	✓	✓
Packing list	✓	✓
Certificate of origin	✓	✓
Request for inspection committee before repackaging. (This is submitted with importing company's documents and must be stamped by the company's seal)	-	✓
Letter from the producing company guaranteeing the quality of the pesticide after repacking	-	✓
Letter from local repacking factory stating its approval for repacking	-	✓

After withdrawal of samples, a request for payment of analysis fees is submitted, attached to a check for the value of the analysis.

Every 25 tons = one analysis, and the following fees are paid for **each analysis**.

1800 Egyptian pounds for analysis fees.

3700 Egyptian pounds in case of existence of impurities.

The analysis fees are presented with a check addressed to the head of the pesticide analysis and evaluation unit (the Central Laboratory for Agricultural Pesticides).

In the case of re-packing, ***an additional amount of 300 Egyptian pounds*** is to be paid for ***each 25 tons***.

During the sample withdrawal, the control representative goes with the customs broker and a representative from the importing company with a seal. About 11 samples are withdrawn. The control representative takes half, and the other half stays with the representative of the importing company to provide it in case of re-analysis. All samples are sealed with red wax, sealed with the seal of the laboratory and the seal of the importing company. An inspection report is written and the seals are added to it.

The original certificate of analysis is handed over to the customs broker and a copy is handed over to the importing company.

In the case of re-packing, the re-packing factory, after inspection before packing, will issue another customs certificate considering that it is a free zone and put it in the analysis file to make a new inspection request after re-packing.

The expected duration of the analysis is about ***7 to 12 days*** as a maximum in case of the existence of impurities.

8) Release of shipment from customs authority

After sample withdrawal and inspection, the below documents will need to be submitted in order to release the shipment from customs.

Table 5: Shipment documents for customs clearance

Required Documents	Pesticide (Final Product)	Repackaging

Request for a customs release of an agricultural pesticide shipment. (This is submitted with importing company's documents and must be stamped by the company's seal)	✓	✓
copy of technical approval certificate+ copy of proforma invoice.	✓	✓
Copy of pesticide registration certificate	✓	✓
Copy of pesticide label	✓	✓
Copy of OTP analysis certificate	✓	✓
Pre-harvest certificates	✓	✓
Copy of the traders' license of the local company	✓	✓
Form 4	✓	✓
A copy of the commercial invoice issued by the bank. In case it is different from the preliminary invoice, 0.007% of the value of the difference in the invoice will be paid in the final invoice.	✓	✓
Copy of bill of lading	✓	✓
Copy of packing list	✓	✓
Copy of certificate of origin	✓	✓
Sample withdrawal record from the Central Laboratory for Agricultural Pesticides	✓	✓
Customs Certificate	✓	✓
In case of previous importation of the pesticide:	✓	✓

▪ Copy of release license for the last shipment of the formulation. ▪ Copy of the route of the last shipment of the formulation.		
A receipt of two Egyptian pounds from the ministry	✓	✓
Letter from the producing company guaranteeing the quality of the pesticide after repacking	-	✓
Letter from local repacking factory stating its approval for repacking	-	✓

The original certificate of analysis and original customs release, a copy of technical approval, and the original bank documents are handed over to customs broker.

A stamp with a value of ***one Egyptian pound*** is placed on all papers in the previous table.

Technical approval issuance fees are calculated on each customs release, the value of ***200 Egyptian pounds***, to be paid in the Ministry's treasury.

b) Overview of Challenges

1) Challenges during registration process:

- If the formulation being registered consists of more than one active substance and each substance is registered on its own in the country of origin, but the formulation itself is not registered, it will not be accepted in Egypt.
- During submission of dossier, PHI test results from Egyptian labs must be submitted among the technical documents required. However, the process of issuing lab results in Egyptian labs can be lengthy. To avoid any delays, a copy of PHI test conducted in the country of origin can be submitted alongside a proof of payment for the PHI test that is to be conducted in Egypt. This will facilitate the process of submitting the dossier until Egyptian labs issue PHI results.

2) General Challenge:

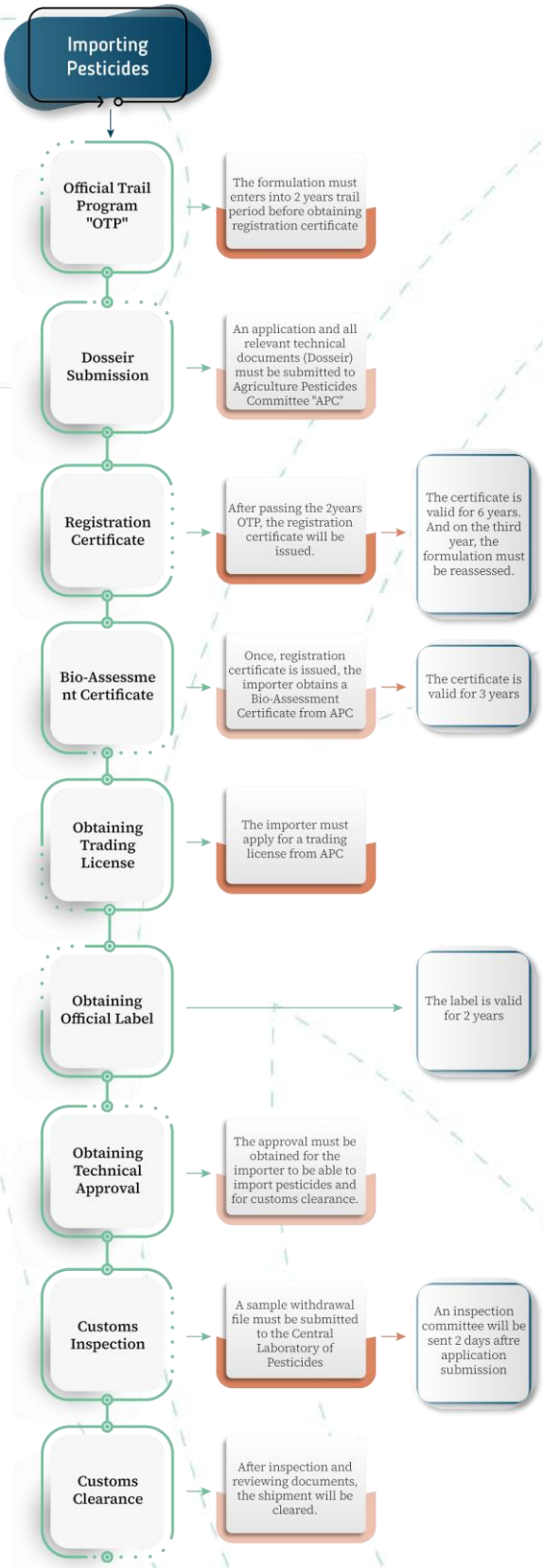
- The main challenge that exporters and importers encounter throughout the process of exporting pesticides to Egypt is the length of the process and the rigidity of some steps that hinder the process of exporting. Moreover, same documents are submitted multiple times to governmental authorities resulting in duplication of work and high levels of bureaucracy.

c) Summary

The aim of this section is to summarize the overall process of importing pesticides.

The below figure summarizes the process of importing pesticides:

Figure 12 Summary of Process of Importing Pesticides



Dosseir Documents Requirements:

1. Authorization letter.
2. Letter of packing quality gurantee.
3. Methods of analysis.
4. Toxicological Studies.
5. Ecotoxicological Studies.
6. Residues studies.
7. Classification in EC/EPA.
8. MSDS for formulation.
9. Certificate of compostion (COC) & Certificate of analysis (COA).
10. MRL.
11. Fingerprint and impurities analysis.
12. Bio-assessment certificate.
13. PHI Certificate
14. OTP payment.
15. Technical data sheet.
16. Manufacturing declaration.
17. Manufacturing site documents.

Trading License Documents Requirements:

1. Commercial register.
2. Copy of tax card.
3. Copy of warehouse/shop license.
4. Registration of warehouse engineer in the Register of Agricultural Engineers.
5. Passing of training course specified by committee.
6. Insurance certificate for the person responsible for the warehouse.
7. Drawing of site approved by a union engineer.
8. Copy of lease or ownership.
9. Receipt indicating the payment of the prescribed inspection expenses.
10. A governmentpostal order in the amount of one pound.

Official Label Documents Requirements:

1. Company Letter requesting the official label.
2. OTP certificate
3. Valid registration certificate.
4. Valid trading license.
5. Period of harvest from APC.
6. Pesticide antidote if it exists.

Technical Approval Documents Requirements:

1. Copy of registration certificate.
2. Copy of formulation label.
3. Copy of proforma invoice.
4. Copy of OTP analysis certificate.
5. Copy of the traders' license of the local company
6. Copy of clearance license for the last shipment of the formulation.
7. Copy of the route of the last shipment of the formulation.
8. Copy of Agricultural Pesticide Lab's inspection of the Warehouse

ENROOT

2) Importing Chemical Fertilizers

The aim of this section is to provide an overview of the process that should be followed by Dutch exporters and Egyptian importers of chemical fertilizers.

Note: Fertilizers don't require a letter of credit since it is a raw material and not a final end user product.

a) Process

To initiate the process of importing chemical fertilizers, local importer must apply for a trading license at the Ministry of Agriculture and Land Reclamation "MoLAR". After that, the exporter will share with the importer technical documents regarding the formulation of the fertilizers among other documents to start the registration process for fertilizers at MoLAR. The ministry will test samples of the chemical fertilizers before approving the registration. Following that, the exporter will ship the shipment and will be inspected at customs to receive the final clearance. The figure below depicts the process of importing fertilizers:

Figure 13 Process of Importing Fertilizers

1) Registration

Note: it should be noted that the importing process differs depending on the type of the importer.

If the importer is a firm that buys the fertilizer at the purpose of trading it, then the process goes as follows:

1) Obtaining Trading License

In order for the importer to be able to sell the fertilizers in the Egyptian market, a trading license must be obtained from the Ministry of Agriculture and Land Reclamation.

What are the documents required?

i. Copy of registration in the commercial register (original for review).
ii. Copy of tax card (original for review).
iii. Copy of the license issued by the concerned authority to set up the shop (original for review).
iv. Sketch of each of the places designated for the trade of fertilizers.

v. Copy of the lease, ownership contract and the company registered in the real estate registry.
vi. A certificate from the Syndicate of Agricultural Professions stating that the technical manager in charge of the store or warehouse is licensed and registered in the Engineers Register.
vii. Insurance certificate for the agricultural engineer in charge of the store or warehouse, provided that the Directorate of Agriculture takes the necessary action to ensure that the conditions for environmental protection are met in accordance with the prevailing laws.

The form for obtaining trading license is attached below:


Request for obtaining trade lice

Twenty Egyptian pounds Inspection fees to be paid in cash or by check payable to the account of the Agricultural Research Center, Analysis and Studies Unit.

Five Egyptian pounds to be paid by post to Soil, Water & Environment Research Institute.

Three Egyptian pounds and ten piasters to be paid as a quality tax and a resource development fee on the license.


Expected time to issue the license is within ***two weeks.***

2) Registration at the Ministry of Agriculture

The importer must register the fertilizer at the Ministry of Agriculture and Reclamation to be able to obtain import approval.

What are the required documents?

i. Paid registration request for a site, and in case of re-registration, a copy of the registration certificate must be attached.
   - ❖ To complete the required data in the registration application, such as the type of crop, fertilizer, dose, PH number of the compound, and the spray solution if it is added as a spray or dissolved in water.
ii. A copy of the label on the packages showing formulation components.
iii. Statement or bulletins about the formulation.

iv. The imported fertilizer formulations must have a certificate of analysis approved by the Egyptian Consulate in the country of origin, containing the specifications of the packaging and the nature and color of the fertilizer.

Note: these originals of abovementioned documents must be submitted alongside four copies of each of the documents and they should be compiled into five different files.

v. Copy of the trading license and the original for reviewing or notarized of the license.
vi. A declaration by the applicant that the compound is free of any other substances or additives, whether organic, biological or chemical, other than those mentioned in the application.
vii. Authorization letter from the exporter to allow the importer to register the Formula.
viii. Technical data sheet.
ix. Material safety data sheet (MSDS).
x. Registration certificate of the formula in the country of origin (in the Ministry of Agriculture, Nature and Food Quality in Netherlands).
xi. The address of the store mentioned in the trading license shall be written in the clause of the name of the commercial agent and the name of the authority authorized to import, in the registration application submitted by the company.

Each registration costs approximately ***350 Egyptian pounds***.

However, there are specified commercial firms in dealing with the registration process that the importer can approach, and they would handle the whole process. Their fees can reach up to ***4000 Egyptian pounds.***

This process takes from ***6 – 18 months***

Note: The Ministry of Agriculture will request samples for testing and inspection.

Reasons behind formula refusal:

- If the main elements in the formula are existing in lower than 15 percent of the formula.
- No clear specification of the source of active ingredients.
- Labeling and spelling mistakes.

The importer is notified with each of the above in the form of a note and he has to correct the refusal reason in order to be able to register the formula.

2) Shipment and customs clearance

What are the documents required for customs clearance?

ENROOT

i. Pro forma invoice
ii. Packaging list
iii. Bill of lading
iv. Technical Data Sheet
v. Material Safety Data Sheet

The ministry of agriculture draws samples for testing and the shipment is released once the test result reveals their compliance with the Egyptian standards.

- Results may differ depending on the lab in which the samples are being tested. There are two main labs in Egypt: Cairo lab and Alexandria lab. If results are not accurate in one lab, the importer can request for them to be tested in the other to assure whether the results are accurate or not.

If the importer is importing fertilizer for manufacturing purposes - or in other words as a raw material, the ministry of industry, trade and small industries issues the approval for the shipment to be released.

At customs, fertilizers are tested, and the test results take from ***7-10 days***.

If the importer is a firm that buys the fertilizer at the purpose of using it as a raw material, then the process goes as follows:

1) Registration of the Final Product at Ministry of Agriculture:

If the firm is importing the fertilizer as an intermediate good to be used in the production of a final product, the firm must register the final product at the MoLAR. In the registration certificate, all elements used for producing the final product must be stated clearly in the certificate. After that, during the importing process, the importer will be allowed to import the raw material from any country.

Registration certificate takes around ***6 months*** to be issued.

1000 Egyptian pounds are paid to MoLAR for obtaining registration. There are some firms that can facilitate the process of registration and their fees range from ***3000-6000*** Egyptian pounds.

2) *Obtaining Import Approval from Ministry of Trade, Industries and Small Industries:*

What are the documents required?

i. Form 4 (to be issued from General Authority for Investments "GAFI").
ii. Material Safety Data Sheet "MSDS"
iii. Technical Data Sheet "TDS"
iv. Proforma Invoice.
v. Packing List.
vi. Bill of Lading.
vii. Registration Certificate from MoLAR.

3) *Shipment and customs clearance*

What are the documents required for customs clearance?

i. Pro forma invoice
ii. Packaging list
iii. Bill of lading
iv. Technical Data Sheet
v. Material Safety Data Sheet

If all documents are accurate, it would take from ***2-3 days*** for the shipment to be released from customs.

b) Challenges:

- Tax rates imposed on firms importing fertilizers to be used as raw materials are much higher than the rates imposed on firms importing fertilizers for the purpose of trading. The former pays 14 percent value added taxes, while the latter pays only 5 percent.
- It takes around 6 months for the MoLAR to issue the registration certificate in case all documents are accurate. The documents pass through three committees in the ministry and each committee meets only once per month. Hence, if any amendments in the documents need to be done to the submitted documents, the importer will have to wait for minimum one month until the relevant committee meets, which is very time consuming.
- Even though, letter of credit is not required for importing intermediate goods, importers are currently facing obstacles when it comes to securing foreign currency from the banks, due to the shortage currently prevailing in Egypt.
- Some tests are not available in all Egyptian Labs. Hence, customs broker must be well-experienced to be able to request conducting certain tests in specific labs. For instance, phosphorous is allowed to enter Egypt in two forms, phosphorous pentoxide and phosphorous trioxide. Once the shipment arrives to Egyptian ports, a mythology test must be conducted. If the fertilizer contains phosphorous

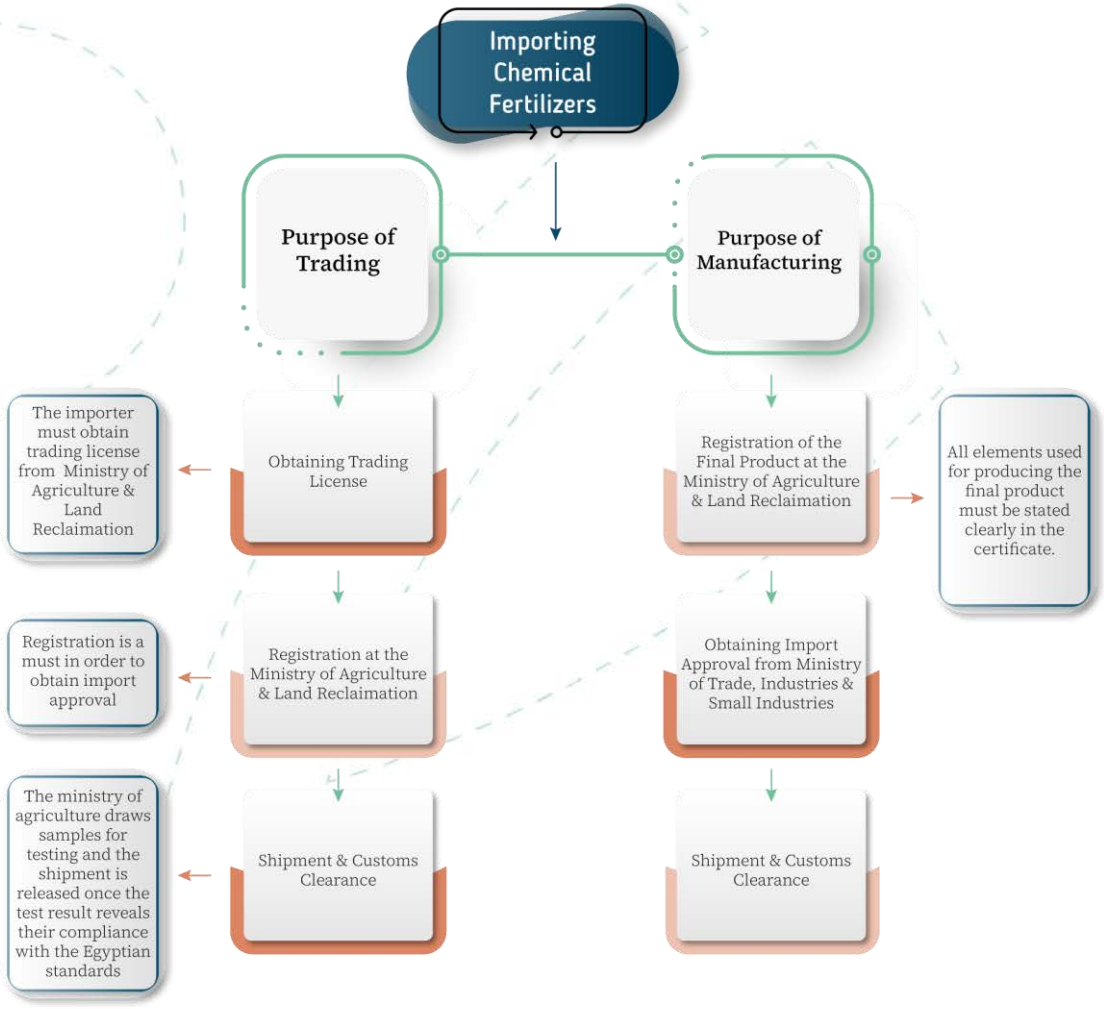
trioxide, conducting the test in labs located in Alexandria will not show accurate results as its mythology tests are not available in Alexandria's labs. Thus, the broker must request to conduct the mythology test in Cairo to avoid any obstructions related to clearance of shipment from customs.

c) Summary

The aim of this section is to summarize the overall process of importing chemical fertilizers.

The below figure summarizes the process of importing chemical fertilizers:

Figure 14 Summary of Process of Importing Chemical Fertilizers



Trading License Required Documents:

1.Copy of registration in the commercial register (original for review).
2. Copy of tax card (original for review).
3. Copy of the license issued by the concerned authority to set up the shop (original for review).
4. Sketch of each of the places designated for the trade of fertilizers.
5. Copy of the lease, ownership contract and the company registered in the real estate registry.
6. A certificate from the Syndicate of Agricultural Professions stating that the technical manager in charge of the store or warehouse is licensed and registered in the Engineers Register.
7. .Insurance certificate for the agricultural engineer in charge of the store or warehouse, provided that the Directorate of Agriculture takes the necessary action to ensure that the conditions for environmental protection are met in accordance with the prevailing laws.

Registration Required Documents:

1. Paid registration request for a site .
2. A copy of the packages showing formulation components.
3. Statement or bulletins about the formulation.
4. The imported fertilizer formulations must have a certificate of analysis approved by the Egyptian Consulate in the country of origin.
5. Copy of the trading license.
6. A declaration by the applicant that the compound is free of any other substances or additives.
Authorization letter.
7. Technical data sheet. Material safety data sheet.
8. Registration certificate of the formula in the country of origin.
9. The address of the store mentioned in the trading license shall be written in the clause of the name of the commercial agent

Import Required Documents:

1. Form 4 (to be issued from General Authority for Investments "GAFI").
2. Material Safety Data Sheet "MSDS"
3. Technical Data Sheet "TDS"
4. Proforma Invoice.
5. Packing List.
6. Bill of Lading.
7. Registration Certificate from MoLAR.

Customs Clearance Required Documents:

1. Proforma Invoice.
2. Packing List.
3. Bill of Lading.
4. Technical data sheet.
5. Material saftey data sheet.

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4) Importing Organic Fertilizers & Pesticides.

Central Laboratory of Organic Agriculture "CLOA" is affiliated to the Ministry of Agriculture and Land Reclamation. It is the entity responsible for approving imported organic or biological agricultural production inputs like organic fertilizers and pesticides.

In order to import any organic agricultural inputs, the importer will need to follow the following:

1) Request submission to Central Administration of Organic Agriculture

The importer must submit the below documents to the Central Administration of Organic Agriculture to be able to import organic agricultural inputs:

i. Organic input certificate issued from the concerned entity in the country of origin.
   - ❖ This certificate shall include type of the product, description of the product, purpose of use, reference for production standards applied in the country of origin for example ISO standards and the name of the conformity body supervising the production, if any.

ii. Technical safety data sheet issued from relevant Dutch authorities.
iii. Certificate of origin.
iv. A certificate stating that the product is traded and used in the country of origin.
v. Payment of registration fees

Note: the fees have not yet been approved by the minister. However, it will not exceed 10,000 Egyptian pounds

For an organic agricultural input to be registered, CLOA will request samples of the product to be tested.

What are the required documents for clearing samples from customs?

i. The company's letter signed by the experimenting official in charge of approving the required amount of organic input.
ii. Bill of lading including the required sample from the organic input.
iii. Invoice.

Sample testing will take ***60 days*** and registration certificate is renewed ***annually*** to ensure tractability of inputs and to monitor their efficacy.

After registration, the importer is given the label for the organic input to be added to the packaging and it costs around ***10,000 Egyptian pounds***.

What are the reasons for rejecting organic agricultural inputs?

CLOA rejects specific types of inputs as follows:

- Synthetic pesticides.
- Genetically modified inputs, as their usage is prohibited in organic agriculture.

Chapter Five

1) Importing meat & chicken products:

The aim of this section is to provide an overview of the process that should be followed by the Dutch exporters and the Egyptian importers of meat and chicken products. Moreover, challenges across different steps of the process will be assessed alongside some of the best prevailing practices of companies to mitigate such challenges.

a) Process:

The process of exporting meat and chicken products to Egypt begins first with the approval of manufacturing facilities at the Ministry of agriculture and land reclamation (MoLAR). After that, the local importer must issue an import permit from GAVS. Thirdly, the exporter will initiate production and will issue Halal Certification. Then, both exporter and local importer will register on the ACI system. Once all documents are approved, shipment will be shipped to Egypt, where inspection and customs will take place at the Customs Authority. The steps of the process are depicted in the below figure.

Figure 15 Process of importing meat and chicken products

1) Approval of Facilities by Egyptian Ministry of Agriculture and Land Reclamation

The ministry of agriculture and land reclamation is the main entity responsible for issuing approvals to facilities importing meat and chicken products in Egypt. Facilities in that context include boiling factories and the filling manufacturing factory.

Facilities are assessed based on the factories themselves, the technology used and the mechanism of processing meat and chicken products.

How does the assessment take place?

The importer applies for a visit to the government, and they send doctors to conduct facility checks and depending on their report, they either grant approvals or not.

Note: Approvals must be renewed every one-three year. However, the Ministry of Agriculture and Land Reclamation is not definite regarding this time period. Sometimes validity will be extended and other times, exporters will need to apply for a revisit and reevaluation of the facility to get the approval.

2) Apply for import permits at General Authority of Veterinary Services "GAVS".

Upon the receival of approvals from MoLAR, importers and exporters apply for import permits at GAVS - the entity responsible for assessing exporters and importers of meat and chicken products compliance with Egyptian requirements in order to grant them import permits.

Who applies for the import permits at GAVS?

GAVS requests documents from both Dutch exporters and local importers. **The list of requested documents is as follows:**

i. Performa invoice (to be provided by Dutch exporter)
ii. Application letter (to be provided by local importer)
iii. Notarized "Epidemiological situation" from Ministry of Agriculture (to be provided by local importer)
   - ❖ Epidemiological situation refers to a map that the main diseases and viruses prevailing in each country. It is published by the World Organization for Animal Health "OIE", however this document needs to be notarized from the Ministry of Agriculture to be accepted by government entities.

How long does this process take?

Generally speaking, the duration of obtaining an import permit is supposed to take around **one-two weeks.** However, in practical this may reach a year or more according to the direction of the government.

Estimated cost for issuing the import permit is around ***one percent of the proforma invoice.***

Duration for obtaining the import permit ranges between ***one to two weeks*** and the permit is valid for ***two months.***

3) Exporters initiate the production process.

Once the import permit is received, exporters initiate production. Production cannot be initiated before obtaining the permit, as if for any reason the permit is rejected, producer will incur huge losses.

4) Obtaining Halal Certificate

Before ISEG, Halal offices in the exporting country used to issue halal certificates and legalize it from the Egyptian embassy. However, now the ISEG Halal is the only entity exclusively authorized by the Government of Egypt to certify Halal exports worldwide. The process of obtaining Halal Certificate consists of four main stages as shown below:

1. **Evaluation:**

An inspector from the entity will be sent to evaluate the exporters facilities to confirm that animal slaughtering is conducted in adherence with Islamic rules and practices.

What are the required documents for Halal certification?

i. Application for Halal certification form (can be obtained from the following website: https://iseghalal-eg.net/documentation/)
ii. Product description
iii. Ingredients statement
iv. Production flowchart
v. Sanitation procedures
vi. Halal certificate for raw materials (if applicable)
vii. Statement of objectives (SOO)
viii. Certificate of acceptability (COA)
   - ❖ A COA is a certificate that is issued out by the local health authority whereby an inspector will carry out an inspection to ensure the food establishment meets the requirements set out.

ix. Material Safety Data Sheet (MSDS)
   - ❖ A material safety data sheet is a technical document which provides detailed and comprehensive information on a controlled product related to:
     - health effects of exposure to the product
     - hazard evaluation related to the product's handling, storage or use
     - measure to protect workers at risk of exposure
     - emergency procedures.

2. **Inspection:**

As soon as the facility is approved, a supervisor from ISEG is assigned to continue monitoring the facility. The supervisor will ensure that all products produced follow the Halal requirements.

3. **Certification:**

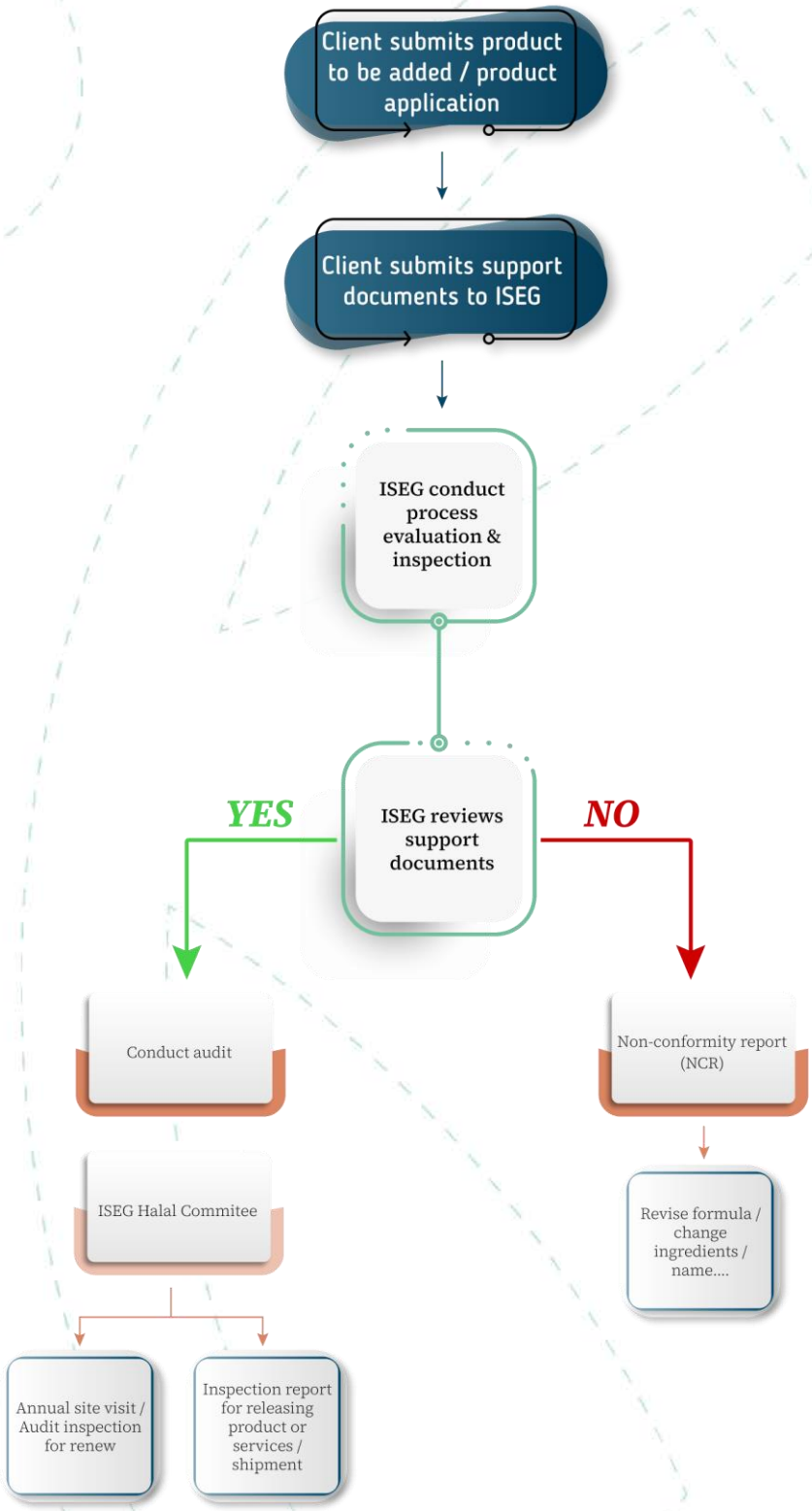
Once the inspector gives his approval, Halal certification will be issued.

4. **Deliver and Support:**

Once the exporter obtains Halal certification for his/her products, an account manager will be designated to process the documents needed for the transportation of the exported products.

The figure below summarizes the process of obtaining Halal Certification.

Figure 16 Halal Certification Process



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5. Product inspection in the Netherlands

Products should be inspected by multinational inspection companies at the country of origin, and they issue an inspection certificate and grant approvals for exporting firms to ship their products to Egypt.

This certification will be checked by National Food Safety Authority "NFSA" alongside labelling and health release during customs clearance and without it the shipment will not be cleared.

The list of authorized inspection companies by NFSA is shown in the table below:

Table 6 Authorized inspection companies by NFSA

Companies
INTERTEK
TUV Nord Egypt
SGS Société Générale de Surveillance
COTECNA

6. Shipment of products

For the exporter to be able to ship the shipment to Egypt, he/she alongside the local importer must register on NAFEZA and CargoX. Refer to chapter two for more details regarding registration and the required documents.

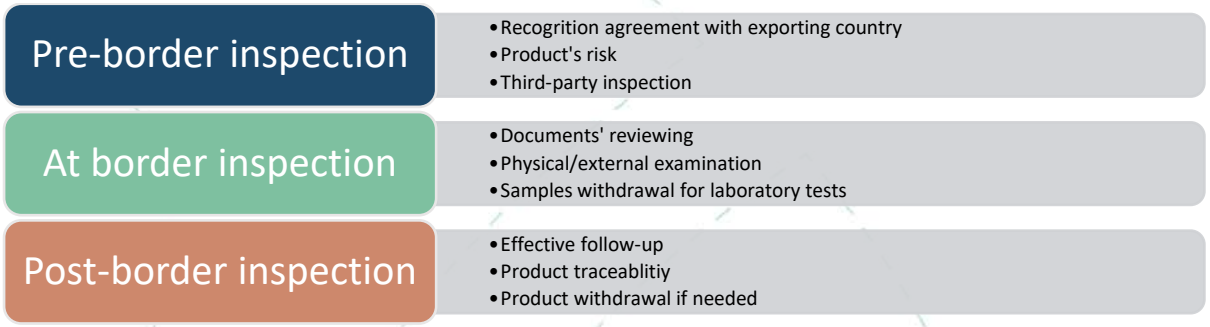
Note: It should be noted that meat products are excluded from the letter of credit requirement – which is one of the documents that are usually required during registration on NAFEZA. Thus, this document will not be submitted on Nafeza.

1. Inspection of products at Egyptian Customs:

Once the shipment arrives to Egypt, Samples from the shipment is taken to be tested by NFSA to ensure that the products are produced in accordance with Egyptian standards. During inspection period, the shipment is conditionally released from customs. In other words, the shipment cannot be used or traded until receival of final clearance.

NFSA's system of import control consists of three main phases as shown in the figure below:

Figure 17 NFSA's system of import control



Food importers must prove that shipments destined for Egypt comply with the requirements of the National Food Safety Authority (NFSA) through certificates issued by NFSA-registered inspection and certification companies. In addition, the competent authority of the exporting country may also certify compliance verification if it has a recognition agreement with the National Food Safety Authority. It should be noted that shipments accompanied by a recognized certification or compliance certificate will be subject to a reduced random sampling rate as well as rapid release.

NFSA creates a risk profile for the shipment based on three main factors:

i. Recognition Agreement with the exporting country:

- Egypt must have a recognition agreement with the exporting country which means that the country's system is complying with Egypt's standards and requirements.
- Product's risk.
- Risk of the products vary according to the categories of food. Meat and animals would be classified as high-risk products while dry bean would be classified as low risk products.

ii. Product categorization according to the risk:

- Tables 2,3 and 4 in the **Annex** lists all high, medium and low risk.

iii. Accreditation through third-party inspection:

- For a shipment to get import approval there must be an inspection in the country of origin from an authorized third-party firm that is registered at NFSA to verify that the exporter's facilities and manufacturing conditions are complying with Egypt's standards.

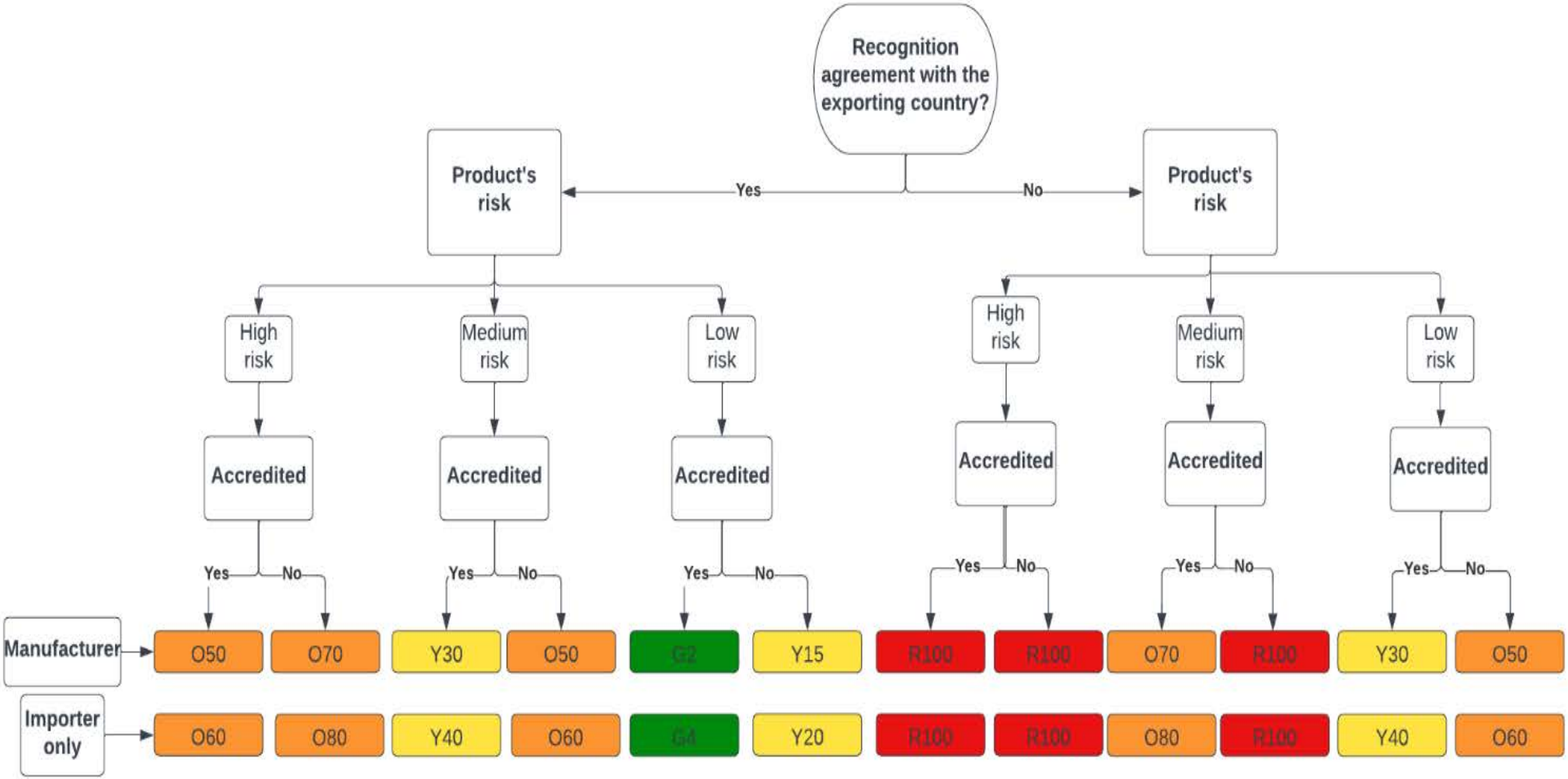
Note: Another factor is proposed to be added which is the importer's compliance history. This is to be applied given the fact that all importers must be registered at NFSA. If an importer has a good history of compliance, this would provide him with the privilege of ease and facilitation of processes, while an importer with a history of violation to the stated regulations (either food safety or paperwork) would be put under additional rounds of inspection to assure the shipment's compliance with the procedures.

NFSA's import control committee adopts a lane system where it sets four release lanes for imported food shipments: **green**, **yellow**, **orange** **and** **red.** Release pathways will determine the rate of random inspection and sampling as well as the release criteria for imported food shipments. Adding to that, shipments for white-list manufacturers or importers will be subject

to a lower rate of withdrawal of samples from such shipments than for non-registered shipments.

The following flowchart depicts the process of determining the lane through which the shipment would be examined:

Figure 18 NFSA'S lane system


Recognition agreement with the exporting country?
Yes
No
Product's risk
Product's risk
High risk
Medium risk
Low risk
High risk
Medium risk
Low risk
Accredited
Accredited
Accredited
Accredited
Accredited
Accredited
Yes
No
Yes
No
Yes
No
Yes
No
Yes
No
Yes
No
Manufacturer
Importer only
O50
O70
Y30
O50
G2
Y15
R100
R100
O70
R100
Y30
O50
O60
O80
Y40
O60
G4
Y20
R100
R100
O80
R100
Y40
O60

Depending on the three main factors abovementioned, the lane through which the shipment would be examined is determined as follows:

For countries that Egypt has a recognition agreement with:

If Egypt has a **recognition agreement** with the exporting country and **high-risk products**, then:

- When the product is **accredited** from a third-party inspector → it would go through an orange lane where it would get a 50 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 60 percent inspection.
- When the product is **not accredited** from a third-party inspector → it would go through an orange lane where it would get a 70 percent inspection if the importer is also registered at NFSA as a manufacturer. If not, then it would get an 80 percent inspection.

If Egypt has a **recognition agreement** with the exporting country and **medium-risk products**, then:

- When the product is **accredited** from a third-party inspector → it would go through a yellow lane where it would get a 30 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 40 percent inspection.
- When the product is **not accredited** from a third-party inspector → it would go through an orange lane where it would get a 50 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 60 percent inspection.

If Egypt has a **recognition agreement** with the exporting country and **low-risk products**, then:

- When the product is **accredited** from a third-party inspector → it would go through a green lane where it would get a 2 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 4 percent inspection.
- When the product is **not accredited** from a third-party inspector → it would go through a yellow lane where it would get a 15 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 20 percent inspection.

For countries that Egypt has no recognition agreement with:

If Egypt has **no recognition agreement** with the exporting country and **high-risk products**, then:

- Either the product is **accredited** from a third-party inspector **or not** → it would go through a red lane where it would get a 100 percent inspection if the importer is also registered at NFSA as a manufacturer or registered only as an importer.

If Egypt has **no recognition agreement** with the exporting country and **medium-risk products**, then:

- When the product is **accredited** from a third-party inspector → it would go through an orange lane where it would get a 70 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get an 80 percent inspection.
- When the product is **not accredited** from a third-party inspector → it would go through a red lane where it would get a 100 percent inspection if the importer is also registered at NFSA as a **manufacturer** or registered only as an importer.

If Egypt has **no recognition agreement** with the exporting country and **low-risk products**, then:

- When the product is **accredited** from a third-party inspector → it would go through a yellow lane where it would get a 30 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 40 percent inspection

When the product is **accredited** from a third-party inspector → it would go through an orange lane where it would get a 50 percent inspection if the importer is also registered at NFSA as a **manufacturer**. If not, then it would get a 60 percent inspection.

It should be noted that the Ministry of Health's implementation of Egyptian National Standard 7135 (2010) and its amendments requires ***100 percent*** sampling and testing of meat and offal imports for certain drug residues. Even though NFSA has taken on the responsibility of all Egyptian food imports, the 100 percent sample on beef and beef products remains in place. Imported Commodities Registered with NFSA eligible for the Application Certificates of Conformity). These products, if obtained certificate of conformity, will have reduced sampling.

Beef and beef products are not included in the list.

Other rules governing the importing of meat and chicken products:

- The Ministry of Agriculture and Land Reclamation in Ministerial Decree 448 (2012) banned the import of heat-treated feather meal. Egypt cites avian influenza (AI) contamination and nutritional value concerns as a justification for the ban. Although Egypt has notified the World Trade Organization (WTO), its notification omits references to it having similar concerns with its own domestic feather meal production. This ban contradicts World Organization for Animal Health (OIE) findings and is inconsistent with Egypt's WTO obligations. However, contacts indicate that the ban currently applies only to animal feed. Imports of treated feather for industrial uses are permitted upon the approval of GAVS technical committee on a case-by-case basis.
- Egypt requires that beef come from cattle that are less than 48-months old for deboned meat, and less than 30-months of age for bone-in meat only for special cuts. These standards are not in line with OIE guidelines.

- An import ban was placed on poultry parts in 2003. In 2006, Egypt relaxed the ban after an outbreak of avian influenza, but limited imports to whole birds. The basis for the exclusion of poultry parts and offal is linked to unfounded concerns with halal slaughter.
- Prohibited goods to import: poultry guts and limbs. Liver birds. Tuna containing genetically treated oils.

b) Refusal of Shipments & Egyptian Regulations:

The fundamental reason for rejecting shipments is the lack of conformity with Egyptian standards. These standards are issued by Egyptian Organization for Standardization & Quality and can be accessed through the following link: https://www.eos.org.eg/ar.

Where can I find changes in rules and regulations?

Changes in rules and regulations are published in "Garidat al-Waqā'i'".

c) Effects of COVID on Meat Exporters:

COVID was not the reason that hindered exporting meat or chicken products to Egypt, but rather putting the issuance of import permits on hold was the main obstacle that encountered Dutch exporters. Egypt stopped granting import permits to canned, fresh and frozen meat importers several years before COVID 19.

d) Challenges Overview:

1) challenges during registration of facilities at MoLAR:

- The checklist upon which the companies are being assessed for registration at MoLAR is not shared with the companies. This makes the inspection process problematic for companies, as they do not have information regarding the KPIs upon which they are being assessed.

- Evaluating each facility takes around one day and usually manufacturers have more than one facility and after the visit is over, reporting takes around ten days and then the process of issuing an import permit is initiated. This is very time consuming and will delay the process of producing and shipping the products to Egypt. Thus, instead of evaluating the facility every one-three year, exporters believe that it will be more efficient if the ministry requests a set of documents to renew the approval.

2) Obtaining Import Permits from GAVS:

- One of the problems that encountered one of the meat exporters is that over the past four years, they have not been granted any import permits and the Ministry of Agriculture did not give them any concrete reasons. And usually, the exporters are told that the committee did not meet, and no solid justification is given for this delay and if they meet, imports permits are more likely to be given to fish importers, but not meat importers. However, Connections with the Dutch Embassy can be used to speed up the process and, in some cases, if the embassy has good connections and relationship with the Ministry of Agriculture, import permits will be granted.
- Time constraint is a major obstacle that encounters producers, as they need to squeeze production and delivery to Egypt within two months' time before the expiry of their import permit. In case the producer could not deliver the product within the abovementioned time-period, the local importer will have to go through the process of re-obtaining an import permit. An extension of 30 days can be requested and with the intervention of the embassy, this period can be further extended.

3) Halal Certification:

- Given that the Halal certification is currently issued by a private entity, the process is supposed to be flexible and less bureaucratic. However, despite this and despite the theoretical clarity of the process, exporters have been experiencing various challenges. For instance, one of the exporters working in canned meat has been waiting for six months to issue a Halal certificate and the exporter has also been struggling to know the required on-ground procedures to issue the certification.

4) Egyptian Regulations:

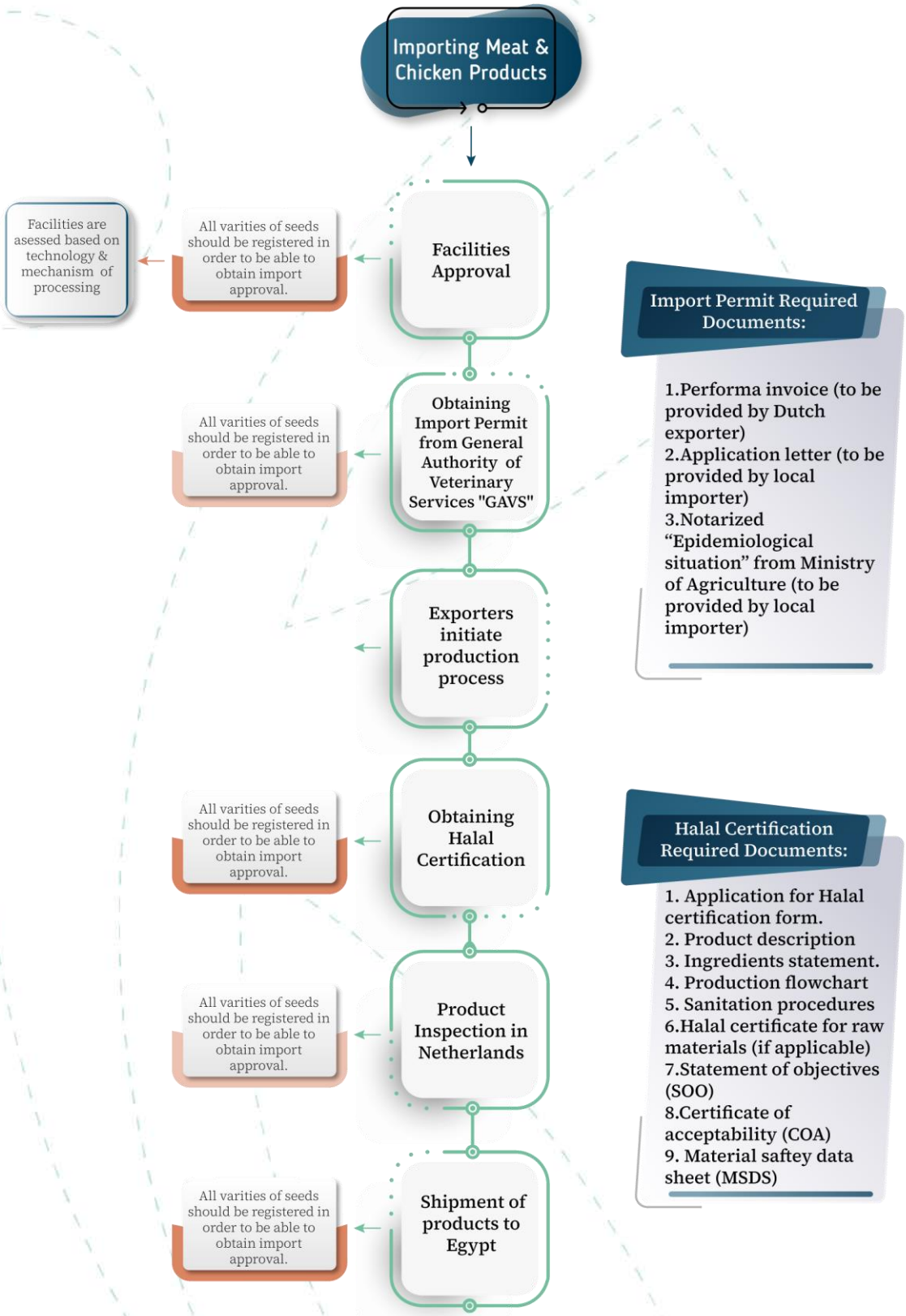
- No regular updates regarding the changes in rules and regulations governing the process of meat trade is shared with exporters or importers and they get notified only when they are processing new shipments.
- Standards are usually issued in Arabic and to facilitate the exporters conformity with the standards, it will be very beneficial for the local importer to send translated updates to the exporter.

e) Summary

The aim of this section is to summarize the overall process of importing meat and chicken products.

The below figure summarizes the process of importing meat and chicken products:

Figure 19 Summary of Process of Importing Meat & Chicken Products



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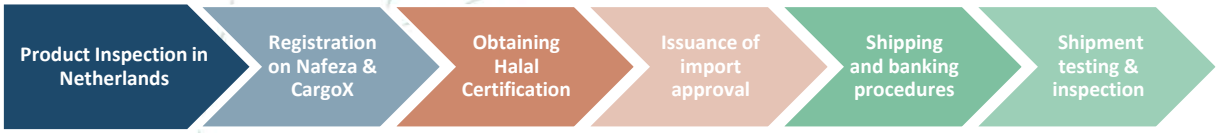
2) Importing Dairy Products

The aim of this section is to provide an overview of the process that should be followed by Dutch exporters and Egyptian importers of dairy products. Moreover, challenges across different steps of the process will be assessed alongside some of the best practices that companies used to overcome such challenges.

a) Process:

The process of exporting dairy products to Egypt begins with products inspection in the Netherlands. Following that, the local importer must open a letter of credit and then that the exporter and local importer must register and upload shipment documents on NAFEZA and CargoX. The exporter must also obtain Halal Certification. fourthly, the importer has to issue an import approval. After obtaining the approval, the exporter ships the shipment to Egypt and the importer must finalize the banking documents. Once, the shipment arrives it will be inspected by NFSA and GAVS to be cleared from customs. The steps of the process are depicted in the below figure.



1) Product inspection in Netherlands

Products should be inspected by multinational inspection companies at the country of origin, and they issue an inspection certificate and grant approvals for exporting firms to ship their products to Egypt.

Who checks the issued certification?

This certification will be checked by NFSA alongside labelling and health release during customs clearance and without it the shipment will not be cleared.

The list of authorized inspection companies by NFSA is shown in the table below:

Table 7 Authorized inspection companies by NFSA

Companies
INTERTEK
TUV Nord Egypt
SGS Société Générale de Surveillance

2) Registration on NAFEZA & CargoX

For the exporter to be able to ship the shipment to Egypt, he/she alongside the local importer must register on Nafeza and CargoX. Refer to chapter two for more details regarding registration and the required documents.

Exporters and importers did not mention any specific challenges related to registration on the platform. They believe that it is a useful platform that aim to digitalize the process, which will contribute to efficiency. However, documents in paper form still need to be sent to the importer, as they must be submitted to the bank, so this part of the process needs digitalization.

3) *Obtaining Halal Certification*

The process mentioned above in the Meat Importing Section is to be followed.

The problem with Halal Certification is that the system is not clear for traders. This is attributed to making ISEG Halal the only authorized entity to issue Halal certifications. Given the fact that the company is still new to the market, the company is lacking the needed capacity and human resources to process the requests of all importers and exporters taking into consideration that Egypt imports large volumes of dairy products and multiple companies are involved in the process.

In line with these challenges encountering the entity, some exceptions were made, and certifications were issued but with some deviations from the theoretical process mentioned previously. For instance, no facility visits were conducted, and approvals were given depending on the international certificates provided by exporters and importers.

Exporters believe that if the company established an efficient system for registration and certification similar to the ACID system, the process will be considerably simplified.

Halal certification will impose higher costs on importers and exporters; however, it will ensure the safety of imported food products.

4) Importer's Documents:

What are the documents that importers should have?

The importers should have the below documents:

i. The local importer should have a valid import card.
ii. Local importer should issue import approval (this is like the initial approval for importing) from GAVS.
iii. The exact quantity that is to be imported should be clearly indicated in the import approval, in order for the authorities to ensure that no fraud happens, or no excess quantities are to be imported.

iv. The importer will need a Performa invoice from the exporter and then go to GAVS to obtain the import approval. Moreover, ACID *number* for the shipment must be provided in proforma invoice for import approval to be granted.
v. The importer also needs to obtain "Health certificate/approval", this approval indicates that the importer has storage capacity for the imported shipments.

Note: The importer cannot wait for the exporter to send copies from the invoice, as this will mean that the shipment has been already shipped from Netherlands and there will be a high probability of rejection once the shipment arrives in Egypt. Hence, it is of crucial importance to first take the import approval and then to inform exporters to start the shipping process.

Duration for obtaining the import approval ranges between **seven *to ten days*** and the approval is valid for ***three months.***

However, due to the current direction of enhancing local production, issuing of import approvals for some products like milk and cheese may be to some extent constrained. Other factors like the devaluation of the Egyptian pound and shortages in foreign currency may further constraint import approvals.

5) Shipping and Banking Procedures

After obtaining import approval, products are shipped to Egypt.

What are the documents that must be sent to the importer?

i. Commercial Invoice.
ii. Certificate of Origin.
iii. Packing List.
iv. Bill of Lading.
v. Proforma Invoice.

The importer submits the abovementioned documents to his/her bank alongside ***"Form Four"*** (This form is obtained from the bank) and the import approval.

- Form Four indicates that the designated bank will be responsible for overseeing the payments of the importer and will be responsible for securing foreign currency needed to complete transactions with the exporter.

6) Shipment Testing and Inspection by GAVS

Once documents are submitted on the portal and physical documents are submitted by the importer/distributor to customs, inspection will be initiated.

Both GAVS and GOEIC have the right to conduct tests on the shipment. Usually, GAVS checks that the products comply with Egyptian Food and Safety Standards and GOEIC checks the labelling and other requirements.

Based on the import approval obtained, inspection and testing to the shipment will take place once it reaches Egyptian Customs. The testing will be carried out by the Ministry of Health's laboratories under the supervision of GAVS and will be approved by NAFSA. GAVS will be present at the Customs during withdrawal of samples.

Shipment is conditionally released from customs. In other words, the shipment cannot be used or traded until receival of final clearance. The shipment will be stored in importer/distributor's warehouses.

Note: There is a newly established system called "The Whitelist" which states that companies that regularly ship products to Egypt can be exempted from customs inspection, and shipments are to be released from customs. (This is explained into details in the section of importing meat and chicken products).

The final clearance will be given once test results prove that products are in line with Egyptian Food Standards and without the clearance it's illegal to sell or distribute the products.

Note: The shipments cannot be cleared from customs unless "Form Four" and "Health Approval" is available. Moreover, ACID number must be written on all the documents submitted to customs.

Reasons for rejecting shipments:

i. Inaccuracy in required shipment documents, ACID number and labelling. This problem is not very common among companies that have mass production.
   - ❖ Sometimes companies may send shipments to Egypt, but with labelling according to other countries requirements. This case can be sorted with the customs committee through adding a new label in line with Egyptian requirements to the shipment and the customs committee will inspect the shipment after adjusting the label and then they can grant the final clearance.

ii. Food Safety Measures: if shipment does not comply with Egyptian Food and Health Standards, it will be rejected and must be executed.
   - ❖ Sometimes the shipment may not be accepted because it got damaged due to poor transportation practices for instance or storage of the sample withdrawn in poor conditions.

- Hence, the importer can request to repeat the tests up to three times before executing the shipment to ensure that no lab errors happened.
- It should be noted that the probability of rejecting a shipment coming from European Union countries because of lack of conformity with quality standards is relatively low.

Note: In case of rejection of shipment, Egyptian law mandates that the shipment is to be returned to the country of origin. However, according to European law, it is forbidden to return products to countries of origin post shipment. Thus, exporters can redirect the shipment to other clients in different countries or the shipment can be executed.

b) Challenges Overview:

1) *Obtaining Halal Certification*

- Given that the Halal certification is currently issued by a private entity, the process is supposed to be flexible and less bureaucratic. However, despite this and despite the theoretical clarity of the process, exporters have been experiencing various challenges. For instance, one of the exporters working in canned meat has been waiting for six months to issue a Halal certificate and the exporter has also been struggling to know the required on-ground procedures to issue the certification.

2) *Obtaining Import Approvals*

- Importers need to apply for multiple import approvals if they are importing a large quantity. For instance, if they are importing 10 containers, they may need to apply for an import approval for each 2 containers. This is challenging as it duplicates the work. Moreover, the changing regulations also complicates the process of obtaining import approvals. For example, by October 2022, proforma invoices for all dairy products imported to Egypt will have to have "under the supervision of halal" on it. In other words, exporters of dairy products will need to obtain halal certification from ISEG.

3) *Egyptian Regulations*

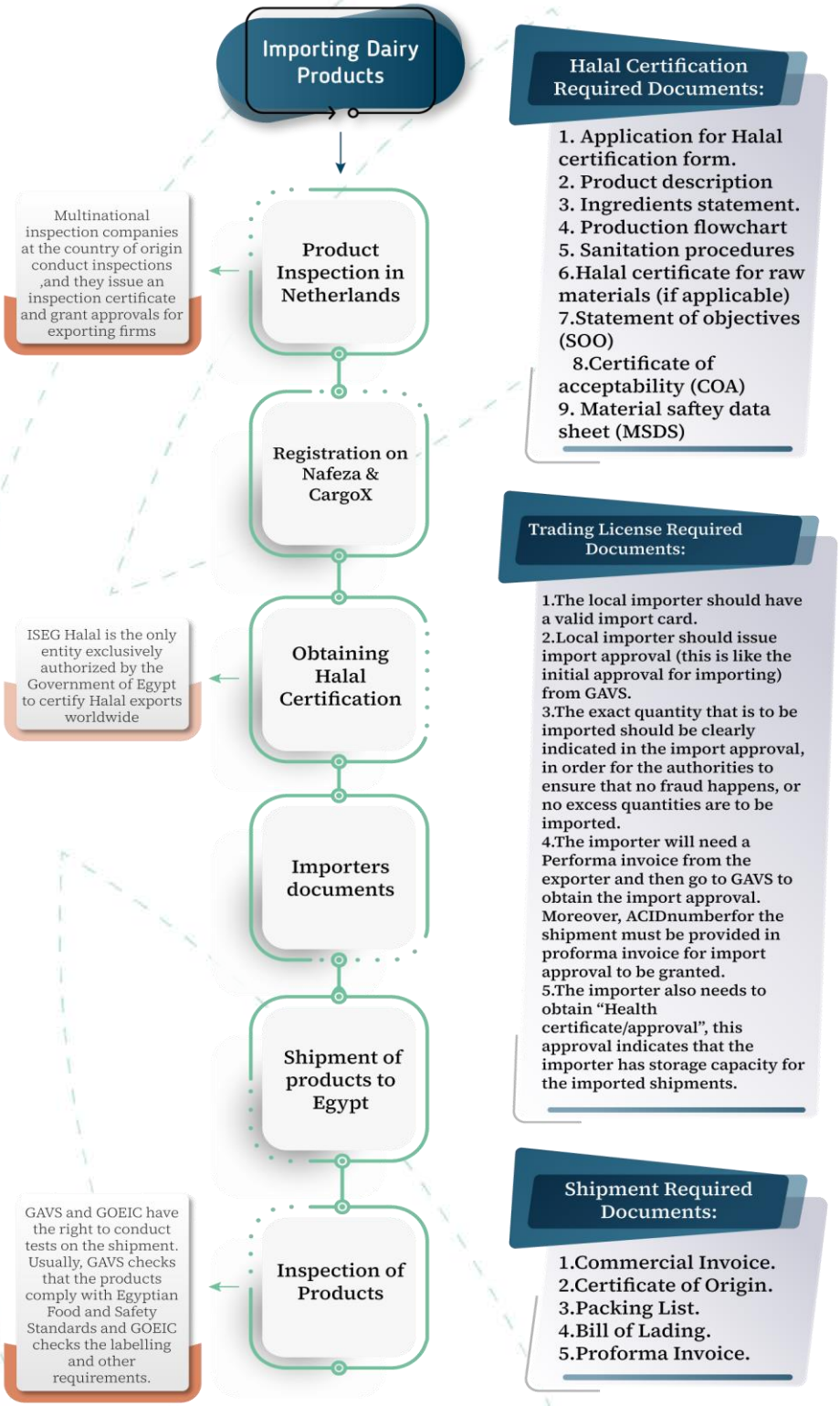
- Devaluation of Egyptian currency and shortage of foreign currency hinders business operations.
- Letter of credit (LC) requirements puts pressure on the importer, as it obliges the importer to deposit the cost of products in advance and this may not be applicable for companies depending on their financial situation. Sudden changes in rules, regulations, and practices.
    - Usually, exporters are informed with such changes through their local partners or in case of large companies from their regulatory affairs.

c) Summary

The aim of this section is to summarize the overall process of importing dairy products.

The below figure summarizes the process of importing dairy products:

Figure 20 Summary of Process of Importing Dairy Products



“For further updates on the recent regulations, please contact the agricultural team of the Netherlands embassy through

Kai-Inv@minbuza.nl”

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Annex

Annex 1

Annex 1 Phytosanitary import requirements for seed potato

Category	Disease
1) Insects: The imported potatoes seed shall be totally free from infestation of the following insects or any of its stages.	▪ Leptinotars decemlineata (Say) ▪ Phthorimaea operculella (Zeller) ▪ Euzophera osseatella (Treitscke) ▪ Premnotrypes spp ▪ Epitrix cucumeris (Harris) ▪ Epitrix subcrinita (Le conte) ▪ Limonius canus ▪ Limonius californicus ▪ Ctenicera pruinina ▪ Epicauta spp. ▪ Phyllophaga spp. ▪ Hydraecia micacea (Esp)
2) Diseases **Imported potato seeds shall be originated in pest free production sites free from the following diseases and its pathogens, these places should be established according to the relevant international standards of phytosanitary measures.**	
2.1 Fungi	▪ Synchytium endobioticum
2.2 Nematodes	▪ Globodera spp ▪ Trichodorusspp and Paratichodorusspp
2.3 Bacteria	▪ Clavibacter michiganensissub sp. Sepdonicus. ▪ Ralstonia solanacearum. ▪ Dickeya spp. ▪ Candidatus Liberibacter solanacearum
2.4 Phytoplasma	▪ Potato Yellow Dwarf and Phytoplasma
The imported potatoes seed shall be totally free from infection with the following diseases	
2.5 Nematodes	▪ Ditylenchus destructor. ▪ Meloidogyne spp.

2.6 Virus and Viroid	▪ Potato Spindle Tuber Viroid ▪ Tobacco Necrosis Virus (TNV) ▪ Tobacco ring spot nepo virus (TRSV)
2.7 Physiological diseases/ other	▪ Frost Injury
Infection of the following diseases shall not exceed the indicated percentage opposite to each disease in the sample representing the lot:	
2.8 Bacteria	▪ Pectobacterium carotovorum (it is prohibited to enter tubers with infection percentage exceeding ***0.2%).*** ▪ Pectobacterium atrosepticum (it is prohibited to enter tubers with infection percentage exceeding ***0.2%).***
2.9 Fungi	▪ Phytophthora erythoseptica (it is prohibited to enter tubers with infection percentage exceeding ***0.2%).*** ▪ Phytophthora infestans (it is prohibited to enter tubers with infection percentage exceeding ***0.2%).*** ▪ Colletorichum atramentarium- Black dot ▪ (it is prohibited to enter tubers with infection rate exceeding **20%).** ▪ Alternaria solani (it is prohibited to enter tubers with infection rate exceeding ***0.5%).*** ▪ Verticillium spp solani (it is prohibited to enter tubers with infection rate exceeding ***0.5%).***
2.10 Virus	It is prohibited to enter tubers with infection percentage exceeding ***0.1%*** for the following virus: ▪ Corky Ring sport (Tobacco Ratte Virus) ▪ Potato Leaf Roll Virus ▪ Mop Top Virus (MTV)

	It is prohibited to enter tubers with infection percentage exceeding ***0.4%*** for the following virus: ▪ Alfa Alfa Mosaic Virus ▪ PVY ▪ PVX ***Note: the total count of the abovementioned viruses shall not exceed 0.8%.***
2.11 Fungi and Physiological Diseases	Infection with the following diseases shall not exceed the indicated percentage opposite to each disease and the total percentage for all of them shall not exceed ***5%***: ▪ Fusarium spp ***(1%)*** ▪ Phoma spp ***(0.5%)*** ▪ Pythium spp ***(0.5%)*** ▪ Internal brown spot and browning or black spot and vascular discoloration ***(0.5%)*** ▪ Hollow heart ***(0.5%)*** ▪ Black Heat ***(0.5%)*** ▪ Skin necrosis ***(0.5%)*** ▪ Mechanical damage ***(3%)***
2.12 Other Diseases	Infection with the following diseases shall not exceed the indicated percentage opposite to each disease in the sample: ▪ Songospora subterranean (it is not allowed to enter infected tubers with infection rate exceeding ***1%***; the amount of pimples shall not exceed ***10%*** of tuber surface area). ▪ Streptomyces scabies (infected tubers with common scab are being allowed to enter according to the Dutch standard scale number (1.5) ▪ Black scurf and all different symptoms of infection (it is not allowed to enter infected tubers with infection rate

	exceeding ***5%*** and the infected part of the tuber surface shall not exceed ***10%***) ▪ Helminthosporium solani (it is not allowed to enter infected tubers with infection rate exceeding ***20%*** and the infected part of the tuber surface shall not exceed ***20%***)

Annex 2:

Table 8 High risk products according to NFSA's classification

HS Chapter Heading (2 digit)	**HS Code** (4 digits)	**HS Heading Description**	**Preservation** (raw/fresh, chilled, frozen, salted, dried or smoked) or **processing type (WS** = where specified**)**
Meat and Edible Offal (02)	0201	Meat of bovine animals	Raw or Chilled
	0203	Pig meat	Raw or Chilled
	0204	Lamb meat	Raw or Chilled
	0205	Horse meat, mules and donkeys	Raw or Chilled
	0206	Edible offal of bovine animals, swine, sheep, goats, horses, asses, mules or hinnies	Raw or Chilled
	0207	Poultry	Raw or Chilled
	0208	Other meats	Raw or Chilled
	0209	Pig or Poultry Fat	Chilled or Salted or Dried or Smoked

Fish and crustaceans, molluscs and other aquatic invertebrates (03)	0302	Fish	Raw or Chilled
	0304	Fish	Raw or Chilled
	0305	Fish	Smoked or Salted
	0306	Crustacea	Raw or Chilled or Dried or Smoked or Salted
	0307	Oysters and molluscs	Raw or Chilled or Dried or Smoked or Salted
	0308	Oysters and molluscs	Raw or Chilled
Dairy produce birds' eggs natural honey edible products of animal origin,not elsewhere specified or included (04)	0401	Milk and cream, not concentrated nor containing added sugar or other sweetening matter	WS
	0402	Milk and cream, concentrated or containing added sugar or other sweetening matter	WS
	0403	Buttermilk, curdled milk and cream, yogurt, kephir and other fermented or acidified milk and cream, whether or not concentrated or flavoured or containing added sugar or other sweetening matter, fruits, nuts or cocoa	WS
	0404	Whey, whether or not concentrated or containing added sugar or other sweetening matter; products consisting of natural milk constituents, whether or not containing added sugar or other sweetening matter	WS
	0406	Cheese and curd	WS

	0407	Birds' eggs, in shell, fresh, preserved or cooked	WS
	0408	Birds' eggs, not in shell, and egg yolks, fresh, dried, cooked by steaming or by boiling in water, moulded, frozen or otherwise preserved, whether or not containing added sugar or other sweetening matter	WS
	0410	Turtles' eggs, birds' nests and other edible products of animal origin, n.e.s.	WS
Products of animal origin, not elsewhere specified or included (05)	0504	Guts, bladders and stomachs of animals (other than fish), whole and pieces thereof, fresh, chilled, frozen, salted, in brine, dried or smoked	Raw or Chilled
Edible vegetables and certain roots and tubers (07)	0702	Tomatoes	Raw or Chilled
	0703	Onions, shallots, garlic, leeks and other alliaceous vegetables	Raw or Chilled
	0704	Cabbages, cauliflowers, kohlrabi, kale and similar edible brassicas	Raw or Chilled
	0705	Lettuce "Lactuca sativa" and chicory "Cichorium spp."	Raw or Chilled
	0709	Other vegetables, fresh or chilled (excl. potatoes, tomatoes, alliaceous vegetables, edible brassicas, lettuce "Lactuca sativa" and chicory "Cichorium spp.", carrots, turnips, salad beetroot, salsify, celeriac, radishes and similar edible roots, cucumbers and gherkins, and leguminous vegatables)	Raw or Chilled
	0714	Roots and tubers of manioc, arrowroot, salep, Jerusalem artichokes, sweet potatoes and similar roots and tubers with high starch or	Raw or Chilled

		inulin content, fresh, chilled, frozen or dried, whether or not sliced or in the form of pellets; sago pith	
Edible fruit and nuts; peel of citrus fruit or melons (08)	0801	Coconuts, Brazil nuts and cashew nuts, fresh or dried, whether or not shelled or peeled	Raw or Chilled
	0804	Dates, figs, pineapples, avocados, guavas, mangoes and mangosteens	Fresh or Dried
	0805	Citrus fruit	Fresh or Dried
	0806	Grapes	Fresh or Dried
	0808	Apples, pears and quinces	Fresh
	0809	Apricots, cherries, peaches incl. nectarines, plums and sloes	Fresh
	0810	strawberries, raspberries, blackberries, back, white or red currants, gooseberries and other edible fruits (excl. nuts, bananas, dates, figs, pineapples, avocados, guavas, mangoes, mangosteens, papaws "papayas", citrus fruit, grapes, melons, apples, pears, quinces, apricots, cherries, peaches, plums and sloes)	Fresh
	0814	Peel of citrus fruit or melons, incl. watermelons, fresh, frozen, dried or provisionally preserved in brine, or in water with other additives	WS
Preparations of meat, of fish or of crustaceans, molluscs or other aquatic invertebrates (16)	1601	Sausages and similar products, of meat, offal or blood; food preparations based on these products	Chilled
	1602	Prepared or preserved meat, offal or blood (excl. sausages and similar products, and meat extracts and juices)	WS

	1603	Extracts and juices of meat, fish or crustaceans, molluscs and other aquatic invertebrates	WS
	1604	Prepared or preserved fish; caviar and caviar substitutes prepared from fish eggs	WS
	1605	Crustaceans, molluscs and other aquatic invertebrates, prepared or preserved (excl. smoked)	WS
Preparations of cereals, flour, starch or milk; pastrycooks' products (19)	1901	Preparations of cereals, flour, starch or milk; pastrycooks' products (19)	WS
	1905	Bread, pastry, cakes, biscuits and other bakers' wares, whether or not containing cocoa; communion wafers, empty cachets of a kind suitable for pharmaceutical use, sealing wafers, rice paper and similar products	WS
Preparations of vegetables, fruit, nuts or other parts of plants (20)	2005	Other vegetables prepared or preserved otherwise than by vinegar or acetic acid, not frozen (excl. preserved by sugar, and tomatoes, mushrooms and truffles)	WS
Miscellaneous edible preparations (21)	2103	Sauce and preparations therefor; mixed condiments and mixed seasonings; mustard flour and meal, whether or not prepared, and mustard	WS
	2105	Ice cream and other edible ice, whether or not containing cocoa	WS
	2106	Food preparations	WS
Beverages, spirits and vinegar (22)	2202	Waters, incl. mineral waters and aerated waters, containing added sugar or other sweetening matter or flavoured, and other non-alcoholic beverages (excl. fruit or vegetable juices and milk)	WS

Table 9 Medium risk products according to NFSA's classification

HS Chapter Heading (2 digit)	**HS Code** (4 digits)	**HS Heading Description**	**Preservation** (raw/fresh, chilled, frozen, salted, dried or smoked) or **processing type (WS** = where specified**)**
Meat and Edible Offal (02)	0202	Meat of bovine animals	Frozen
	0203	Meat of swine	Frozen
	0204	Meat of sheep or goats,	Frozen
	0205	Meat of horses, asses, mules or hinnies	Frozen
	0206	Edible offal of bovine animals, swine, sheep, goats, horses, asses, mules or hinnies	Frozen
	0207	Meat and edible offal of fowls of the species Gallus domesticus, ducks, geese, turkeys and guinea fowls,	Frozen
	0208	Meat and edible offal of rabbits, hares, pigeons and other animals, fresh, chilled or frozen (excl. of bovine animals, swine, sheep, goats, horses, asses, mules, hinnies, poultry "fowls of the species Gallus domesticus", ducks, geese, turkeys and guinea fowls)	Frozen
	0209	Pig fat, free of lean meat, and poultry fat, not rendered or otherwise extracted	Fresh, chilled, frozen, salted, in brine, dried or smoked
	0210	Meat and edible offal	Salted or Dried or Smoked

Fish and crustaceans, molluscs and other aquatic invertebrates (03)	0303	Fish (excl. fish fillets and other fish meat of heading 030	Frozen
	0304	Fish fillets and other fish meat, whether or not minced	Frozen
	0305	Fish, fit for human consumption, dried, salted or in brine; smoked fish, fit for human consumption, whether or not cooked before or during the smoking process; flours, meals and pellets of fish, fit for human consumption	Dried, salted or in brine; smoked
	0306	Crustaceans, whether in shell or not, live, fresh, chilled, frozen, dried, salted or in brine, even smoked, incl. crustaceans in shell cooked by steaming or by boiling in water; flours, meals and pellets of crustaceans, fit for human consumption	Frozen
	0307	Molluscs, fit for human consumption, even smoked, whether in shell or not, live, fresh, chilled, frozen, dried, salted or in brine; flours, meals and pellets of molluscs, fit for human consumption	Frozen
	0308	Aquatic invertebrates other than crustaceans and molluscs, live, fresh, chilled, frozen, dried, salted or in brine, even smoked; flours, meals and pellets of aquatic invertebrates other than crustaceans and molluscs, fit for human consumption	Frozen
Dairy produce birds' eggs natural honey edible products of animal origin,not elsewhere	0402	Milk and cream, concentrated or containing added sugar or other sweetening matter	WS
	0403	Buttermilk, curdled milk and cream, yogurt, kephir and other fermented or	WS

specified or included (04)		acidified milk and cream, whether or not concentrated or flavoured or containing added sugar or other sweetening matter, fruits, nuts or cocoa	
	0405	Butter, incl. dehydrated butter and ghee, and other fats and oils derived from milk; dairy spreads	WS
Products of animal origin, not elsewhere specified or included (05)	0504	Guts, bladders and stomachs of animals (other than fish), whole and pieces thereof, fresh, chilled, frozen, salted, in brine, dried or smoked	Frozen / Salted
Edible vegetables and certain roots and tubers (07)	0701	Potatoes	Raw or Chilled
	0703	Onions, shallots, garlic, leeks and other alliaceous vegetables, fresh or chilled	Raw or Chilled
	0706	Carrots, turnips, salad beetroot, salsify, celeriac, radishes and similar edible roots, fresh or chilled	Raw or Chilled
	0707	Cucumbers and gherkins	Raw or Chilled
	0708	Leguminous vegetables, shelled or unshelled, fresh or chilled	Raw or Chilled
	0709	Other vegetables, fresh or chilled (excl. potatoes, tomatoes, alliaceous vegetables, edible brassicas, lettuce "Lactuca sativa" and chicory "Cichorium spp.", carrots, turnips, salad beetroot, salsify, celeriac, radishes and similar edible roots, cucumbers and gherkins, and leguminous vegatables)	Raw or Chilled
	0710	Vegetables, uncooked or cooked by steaming or boiling in water, frozen	WS
	0712	Dried vegetables, whole, cut, sliced, broken or in powder, but not further prepared	WS

	0713	Dried leguminous vegetables, shelled, whether or not skinned or split	WS
	0714	Roots and tubers of manioc, arrowroot, salep, Jerusalem artichokes, sweet potatoes and similar roots and tubers with high starch or inulin content, fresh, chilled, frozen or dried, whether or not sliced or in the form of pellets; sago pith	WS
Edible fruit and nuts; peel of citrus fruit or melons (08)	0801	Coconuts, Brazil nuts and cashew nuts, fresh or dried, whether or not shelled or peeled	WS
	0804	Dates, figs, pineapples, avocados, guavas, mangoes and mangosteens, fresh or dried	WS
	0805	Citrus fruit, fresh or dried	WS
	0806	Grapes, fresh or dried	WS
	0811	Fruit and nuts, uncooked or cooked by steaming or boiling in water, frozen, whether or not containing added sugar or other sweetening matter	WS
	0813	Dried apricots, prunes, apples, peaches, pears, papaws "papayas", tamarinds and other edible fruits, and mixtures of edible and dried fruits or of edible nuts (excl. nuts, bananas, dates, figs, pineapples, avocados, guavas, mangoes, mangosteens, citrus fruit and grapes, unmixed)	WS
	0814	Peel of citrus fruit or melons, incl. watermelons, fresh, frozen, dried or provisionally preserved in brine, or in water with other additives	WS
Coffee, tea, mate and spices (09)	0902	Tea, whether or not flavoured	WS
	0909	Seeds of anis, badian, fennel, coriander, cumin or caraway; juniper berries	WS

Oil seeds and oleaginous fruits miscellaneous grains, seeds and fruits industrial or medicinal plants straw and fodder (12)	1208	Flours and meals of oil seeds or oleaginous fruits (excl. mustard)	WS
Animal or vegetable fats and oils and their cleavage products prepared edible fats animal or vegetable waxes (15)	1517	Margarine, other edible mixtures or preparations of animal or vegetable fats or oils and edible fractions of different fats or oils (excl. fats, oils and their fractions, partly or wholly hydrogenated, inter-esterified, re-esterified or elaidinised, whether or not refined, but not further prepared, and mixtures of olive oils and their fractions)	WS
Preparations of meat, of fish or of crustaceans, molluscs or other aquatic invertebrates (16)	1601	Sausages and similar products, of meat, offal or blood; food preparations based on these products	Frozen
	1602	Prepared or preserved meat, offal or blood (excl. sausages and similar products, and meat extracts and juices)	WS
Preparations of cereals, flour, starch or milk; pastrycooks' products (19)	1902	Pasta, whether or not cooked or stuffed with meat or other substances or otherwise prepared, such as spaghetti, macaroni, noodles, lasagne, gnocchi, ravioli, cannelloni; couscous, whether or not prepared	WS
Preparations of vegetables, fruit, nuts or other parts of plants (20)	2001	Vegetables, fruit, nuts and other edible parts of plants, prepared or preserved by vinegar or acetic acid	WS
	2002	Tomatoes, prepared or preserved otherwise than by vinegar or acetic acid	WS

	2003	Mushrooms and truffles, prepared or preserved otherwise than by vinegar or acetic acid	WS
	2004	Vegetables prepared or preserved otherwise than by vinegar or acetic acid, frozen (excl. preserved by sugar, and tomatoes, mushrooms and truffles)	WS
	2005	Other vegetables prepared or preserved otherwise than by vinegar or acetic acid, not frozen (excl. preserved by sugar, and tomatoes, mushrooms and truffles)	WS
	2006	Vegetables, fruit, nuts, fruit-peel and other edible parts of plants, preserved by sugar "drained, glacé or crystallised"	WS
	2007	Jams, fruit jellies, marmalades, fruit or nut purée and fruit or nut pastes, obtained by cooking, whether or not containing added sugar or other sweetening matter	WS
	2008	Fruits, nuts and other edible parts of plants, prepared or preserved, whether or not containing added sugar or other sweetening matter or spirit (excl. prepared or preserved with vinegar, preserved with sugar but not laid in syrup, and jams, fruit jellies, marmalades, fruit purée and pastes, obtained by cooking)	WS
	2009	Fruit juices, incl. grape must, and vegetable juices, unfermented, not containing added spirit, whether or not containing added sugar or other sweetening matter	WS
Miscellaneous edible preparations (21)	2101	Extracts, essences and concentrates, of coffee, tea or maté and preparations with a basis of these products or with a basis of coffee, tea or mate; roasted chicory and other roasted coffee	WS

		substitutes, and extracts, essences and concentrates thereof	
	2102	Yeasts, active or inactive; other dead single-cell micro-organisms, prepared baking powders (excl. single-cell micro-organisms packaged as medicaments)	WS
	2103	Sauce and preparations therefor; mixed condiments and mixed seasonings; mustard flour and meal, whether or not prepared, and mustard	WS
	2106	Food preparations, n.e.s.	WS
Beverages, spirits and vinegar (22)	2201	Waters, incl. natural or artificial mineral waters and aerated waters, not containing added sugar, other sweetening matter or flavoured; ice and snow	WS
	2202	Waters, incl. mineral waters and aerated waters, containing added sugar or other sweetening matter or flavoured, and other non-alcoholic beverages (excl. fruit or vegetable juices and milk)	WS
Organic chemicals (29)	2938	Glycosides, natural or reproduced by synthesis, and their salts, ethers, esters and other derivatives	WS
Albuminoidal substances modified starches glues enzymes (35)	3501	Casein, caseinates and other casein derivatives; casein glues (excl. those packaged as glue for retail sale and weighing net <= 1 kg)	WS
	3502	Albumins, incl. concentrates of two or more whey proteins containing by weight > 80% whey proteins, calculated on the dry matter, albuminates and other albumin derivatives	WS

Table 10 Low risk products according to NFSA's classification

HS Chapter Heading (2 digit)	**HS Code** (4 digits)	**HS Heading Description**	**Preservation** (raw/fresh, chilled, frozen, salted, dried or smoked) or **processing type (WS** = where specified**)**
Dairy produce birds' eggs natural honey edible products of animal origin,not elsewhere specified or included (04)	0409	Natural honey	WS
Edible vegetables and certain roots and tubers (07)	0711	Vegetables provisionally preserved, e.g. by sulphur dioxide gas, in brine, in sulphur water or in other preservative solutions, but unsuitable in that state for immediate consumption	WS
	0712	Dried vegetables, whole, cut, sliced, broken or in powder, but not further prepared	WS
	0713	Dried leguminous vegetables, shelled, whether or not skinned or split	WS
Edible fruit and nuts; peel of citrus fruit or melons (08)	0801	Coconuts, Brazil nuts and cashew nuts, fresh or dried, whether or not shelled or peeled	Raw or Chilled
	0802	Other nuts, fresh or dried, whether or not shelled or peeled (excl. coconuts, Brazil nuts and cashew nuts)	Raw or Chilled

	0803	Bananas, incl. plantains, fresh or dried	Raw or Chilled
	0804	Dates, figs, pineapples, avocados, guavas, mangoes and mangosteens, fresh or dried	Raw or Chilled
	0810	Fresh strawberries, raspberries, blackberries, back, white or red currants, gooseberries and other edible fruits (excl. nuts, bananas, dates, figs, pineapples, avocados, guavas, mangoes, mangosteens, papaws "papayas", citrus fruit, grapes, melons, apples, pears, quinces, apricots, cherries, peaches, plums and sloes)	Raw or Chilled
	0812	Fruit and nuts, provisionally preserved, e.g. by sulphur dioxide gas, in brine, in sulphur water or in other preservative solutions, but unsuitable in that state for immediate consumption	WS
Coffee, tea, mate and spices (09)	0901	Coffee, whether or not roasted or decaffeinated; coffee husks and skins; coffee substitutes containing coffee in any proportion	WS
	0903	Maté	WS
	0904	Pepper of the genus Piper; dried or crushed or ground fruits of the genus Capsicum or of the genus Pimenta	WS
	0905	Vanilla	WS
	0906	Cinnamon and cinnamon-tree flowers	WS
	0907	Cloves, whole fruit, cloves and stems	WS
	0908	Nutmeg, mace and cardamoms	WS
	0909	Seeds of anis, badian, fennel, coriander, cumin or caraway; juniper berries	WS
	0910	Ginger, saffron, turmeric "curcuma", thyme, bay leaves, curry and other spices (excl. pepper of the genus Piper, fruit of the genus Capsicum or of the genus Pimenta, vanilla, cinnamon, cinnamontree flowers, cloves [wholefruit], clove stems, nutmeg, mace, cardamoms, seeds of anise, badian, fennel, coriander, cumin and caraway, and juniper berries)	WS
Cereals (10)	1001	Wheat and meslin	WS

	1002	Rye	WS
	1003	Barley	WS
	1004	Oats	WS
	1005	Maize or cotton	WS
	1006	Rice	WS
	1007	Sorghum	WS
	1008	Buckwheat, millet, canary seed and other cereals (excl. wheat and meslin, rye, barley, oats, maize, rice and grain sorghum)	WS
Products of the milling industry malt starches inulin wheat gluten (11)	1101	Wheat or meslin flour	WS
	1102	Cereal flours (excl. wheat or meslin)	WS
	1103	Cereal groats, meal and pellets	WS
	1104	Cereal grains otherwise worked, e.g. hulled, rolled, flaked, pearled, sliced or kibbled; germ of cereals, whole, rolled, flaked or ground (excl. cereal flours, and husked and semi- or wholly milled rice and broken rice)	WS
	1105	Flour, meal, powder, flakes, granules and pellets of potatoes	WS
	1106	Flour, meal and powder of peas, beans, lentils and other dried leguminous vegetables of heading 0713, of sago and manioc, arrowroot and salep, Jerusalem artichoke, sweet potatoes and similar roots and tubers with high starch or inulin content of heading 0714, produce of chapter 8 "Edible fruit and nuts; peel of citrus fruits or melons"	WS
	1107	Malt, whether or not roasted	WS
	1108	Starches; inulin	WS

	1109	Wheat gluten, whether or not dried	WS
Oil seeds and oleaginous fruits miscellaneous grains, seeds and fruits industrial or medicinal plants straw and fodder (12)	1201	Soya beans, whether or not broken	WS
	1201	فول الصويا	WS
	1202	Groundnuts, whether or not shelled or broken (excl. roasted or otherwise cooked)	WS
	1203	Copra	WS
	1204	Linseed, whether or not broken	WS
	1205	Rape or colza seeds, whether or not broken	WS
	1206	Sunflower seeds, whether or not broken	WS
	1207	Other oil seeds and oleaginous fruits, whether or not broken (excl. edible nuts, olives, soya beans, groundnuts, copra, linseed, rape or colza seeds and sunflower seeds)	WS
	1208	Flours and meals of oil seeds or oleaginous fruits (excl. mustard)	WS
	1210	Hop cones, fresh or dried, whether or not ground, powdered or in the form of pellets; lupulin	WS
	1211	Plants and parts of plants, incl. seeds and fruits, of a kind used primarily in perfumery, in pharmacy or for insecticidal, fungicidal or similar purposes, fresh, chilled, frozen or dried, whether or not cut, crushed or powdered	WS

	1212	Locust beans, seaweeds and other algae, sugar beet and sugar cane, fresh, chilled, frozen or dried, whether or not ground; fruit stones and kernels and other vegetable products, incl. unroasted chicory roots of the variety Cichorium intybus sativum, of a kind used primarily for human consumption, n.e.s.	WS
Lac gums, resins and other vegetable saps and extracts (13)	1301	Lac; natural gums, resins, gum-resins, balsams and other natural oleoresins	WS
	1302	Vegetable saps and extracts; pectic substances, pectinates and pectates; agar-agar and other mucilages and thickeners derived from vegetable products, whether or not modified,	WS
Animal or vegetable fats and oils and their cleavage products prepared edible fats animal or vegetable waxes (15)	1501	Pig fat, incl. lard, and poultry fat, rendered or otherwise extracted (excl. lard stearin and lard oil)	WS
	1502	Fats of bovine animals, sheep or goats (excl. oil and oleostearin)	WS
	1503	Lard stearin, lard oil, oleostearin, oleo-oil and tallow oil (excl. emulsified, mixed or otherwise prepared)	WS
	1504	Fats and oils and their fractions of fish or marine mammals, whether or not refined (excl. chemically modified)	WS
	1505	Wool grease and fatty substances derived therefrom, incl. lanolin	WS
	1506	Other animal fats and oils and their fractions, albeit refined but not chemically modified, put up for retail sale	WS

	1507	Soya-bean oil and its fractions, whether or not refined (excl. chemically modified)	WS
	1508	Groundnut oil and its fractions, whether or not refined, but not chemically modified	WS
	1509	Olive oil and its fractions obtained from the fruit of the olive tree solely by mechanical or other physical means under conditions that do not lead to deterioration of the oil, whether or not refined, but not chemically modified	WS
	1510	Other oils and their fractions, obtained solely from olives, whether or not refined, but not chemically modified, incl. blends of these oils or fractions with oils or fractions of heading 1509	WS
	1511	Palm oil and its fractions, whether or not refined (excl. chemically modified)	WS
	1512	Sunflower-seed, safflower or cotton-seed oil and fractions thereof, whether or not refined, but not chemically modified	WS
	1513	Coconut "copra", palm kernel or babassu oil and fractions thereof, whether or not refined, but not chemically modified	WS
	1514	Rape, colza or mustard oil and fractions thereof, whether or not refined, but not chemically modified	WS
	1515	Fixed vegetable fats and oils, incl. jojoba oil, and their fractions, whether or not refined, but not chemically modified (excl. soya-bean, groundnut, olive, palm, sunflower-seed, safflower, cotton-seed, coconut, palm kernel, babassu, rape, colza and mustard oil)	WS
	1516	Animal or vegetable fats and oils and their fractions, partly or wholly hydrogenated, inter-esterified, re-esterified or elaidinised, whether or not refined, but not further prepared	WS

	1517	Margarine, other edible mixtures or preparations of animal or vegetable fats or oils and edible fractions of different fats or oils (excl. fats, oils and their fractions, partly or wholly hydrogenated, inter-esterified, re-esterified or elaidinised, whether or not refined, but not further prepared, and mixtures of olive oils and their fractions)	WS
	1520	Glycerol, crude; glycerol waters and glycerol lyes	WS
	1521	Vegetable waxes, beeswax, other insect waxes and spermaceti, whether or not refined or coloured (excl. triglycerides)	WS
Preparations of meat, of fish or of crustaceans, molluscs or other aquatic invertebrates (16)	1604	Prepared or preserved fish; caviar and caviar substitutes prepared from fish eggs	WS
Sugars and sugar confectionery (17)	1701	Cane or beet sugar and chemically pure sucrose, in solid form	WS
	1702	Other sugars, incl. chemically pure lactose, maltose, glucose and fructose, in solid form; sugar syrups not containing added flavouring or colouring matter; artificial honey, whether or not mixed with natural honey; caramel	WS
	1703	Molasses resulting from the extraction or refining of sugar	WS
	1704	Sugar confectionery not containing cocoa, incl. white chocolate	WS
Cocoa and cocoa preparations (18)	1801	Cocoa beans, whole or broken, raw or roasted	WS
	1802	Cocoa shells, husks, skins and other cocoa waste	WS

	1803	Cocoa paste, whether or not defatted	WS
	1804	Cocoa butter, fat and oil	WS
	1805	Cocoa powder, not containing added sugar or other sweetening matter	WS
	1806	Chocolate and other food preparations containing cocoa	WS
Preparations of cereals, flour, starch or milk; pastrycooks' products (19)	1901	Malt extract; food preparations of flour, groats, meal, starch or malt extract, not containing cocoa or containing < 40% by weight of cocoa calculated on a totally defatted basis, n.e.s.; food preparations of milk, cream, butter milk, sour milk, sour cream, whey, yogurt, kephir, and similar goods of heading 0401 to 0404, not containing cocoa or containing < 5% by weight of cocoa calculated on a totally defatted basis, n.e.s.	WS
	1902	Pasta, whether or not cooked or stuffed with meat or other substances or otherwise prepared, such as spaghetti, macaroni, noodles, lasagne, gnocchi, ravioli, cannelloni; couscous, whether or not prepared	WS
	1903	Tapioca and substitutes therefor prepared from starch, in the form of flakes, grains, pearls, siftings or similar forms	WS
	1904	Prepared foods obtained by the swelling or roasting of cereals or cereal products, e.g. corn flakes; cereals (other than maize "corn") in grain form or in the form of flakes or other worked grains (except flour, groats and meal), pre-cooked or otherwise prepared, n.e.s.	WS
	1905	Bread, pastry, cakes, biscuits and other bakers' wares, whether or not containing cocoa; communion wafers, empty cachets of a kind suitable for pharmaceutical use, sealing wafers, rice paper and similar products	WS
Preparations of vegetables, fruit, nuts or other parts of plants (20)	2008	Fruits, nuts and other edible parts of plants, prepared or preserved, whether or not containing added sugar or other sweetening matter or spirit (excl. prepared or preserved with vinegar, preserved with sugar but not laid in syrup, and jams, fruit jellies, marmalades, fruit purée and pastes, obtained by cooking)	WS

Miscellaneous edible preparations (21)	2101	Extracts, essences and concentrates, of coffee, tea or maté and preparations with a basis of these products or with a basis of coffee, tea or mate; roasted chicory and other roasted coffee substitutes, and extracts, essences and concentrates thereof	WS
	2103	Sauce and preparations therefor; mixed condiments and mixed seasonings; mustard flour and meal, whether or not prepared, and mustard	WS
	2104	Soups and broths and preparations therefor; food preparations consisting of finely homogenised mixtures of two or more basic ingredients such as meat, fish, vegetables or fruit, put up for retail sale as infant food or for dietetic purposes, in containers of <= 250 g	WS
	2106	Food preparations, n.e.s.	WS
Beverages, spirits and vinegar (22)	2201	Waters, incl. natural or artificial mineral waters and aerated waters, not containing added sugar, other sweetening matter or flavoured; ice and snow	WS
	2202	Waters, incl. mineral waters and aerated waters, containing added sugar or other sweetening matter or flavoured, and other non-alcoholic beverages (excl. fruit or vegetable juices and milk)	WS
	2203	Beer made from malt	WS
	2204	Wine of fresh grapes, incl. fortified wines; grape must, partly fermented and of an actual alcoholic strength of > 0,5% vol or grape must with added alcohol of an actual alcoholic strength of > 0,5% vol	WS
	2205	Vermouth and other wine of fresh grapes, flavoured with plants or aromatic substances	WS
	2206	Cider, perry, mead, saké and other fermented beverages and mixtures of fermented beverages and non-alcoholic beverages, n.e.s. (excl. beer, wine or fresh grapes, grape must, vermouth and other wine of fresh grapes flavoured with plants or aromatic substances)	WS

	2207	Undenatured ethyl alcohol of an alcoholic strength of >= 80%; ethyl alcohol and other spirits, denatured, of any strength	WS
	2208	Undenatured ethyl alcohol of an alcoholic strength of < 80%; spirits, liqueurs and other spirituous beverages (excl. compound alcoholic preparations of a kind used for the manufacture of beverages)	WS
	2209	Vinegar, fermented vinegar and substitutes for vinegar obtained from acetic acid	WS
Salt sulfur earths and stone plastering materials, lime and cement (25)	2501	Salts, incl. table salt and denatured salt, and pure sodium chloride, whether or not in aqueous solution or containing added anti-caking or free-flowing agents; sea water	WS
Inorganic chemicals; organic or inorganic compounds of precious metals, of rare-earth metals, of radioactive elements or of isotopes (28)	2809	Diphosphorus pentaoxide; phosphoric acid; polyphosphoric acids, whether or not chemically defined	WS
	2811	Inorganic acids and inorganic oxygen compounds of non-metals (excl. hydrogen chloride "hydrochloric acid", chlorosulphuric acid, sulphuric acid, oleum, nitric acid, sulphonitric acids, diphosphorus pentaoxide, phosphoric acid, polyphosphoric acids, oxides of boron and boric acids)	WS
	2823	Titanium oxides	WS
	2827	Chlorides, chloride oxides and chloride hydroxides; bromides and bromide oxides; iodides and iodide oxides	WS

	2835	Phosphinates "hypophosphites", phosphonates "phosphites" and phosphates; polyphosphates, whether or not chemically defined	WS
	2836	Carbonates; peroxocarbonates "percarbonates"; commercial ammonium carbonate containing ammonium carbamate	WS
	2839	Silicates; commercial alkali metal silicates (excl. inorganic or organic compounds of mercury)	WS
Organic chemicals (29)	2905		WS
	2905	Acyclic alcohols and their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2906	Cyclic alcohols and their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2914	Ketones and quinones, whether or not with other oxygen function, and their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2915	Saturated acyclic monocarboxylic acids and their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2916	Unsaturated acyclic monocarboxylic acids, cyclic monocarboxylic acids, their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2917	Polycarboxylic acids, their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2918	Carboxylic acids with additional oxygen function and their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulphonated, nitrated or nitrosated derivatives	WS
	2922	Oxygen-function amino-compounds	WS

	2923	Quaternary ammonium salts and hydroxides; lecithins and other phosphoaminolipids, whether or not chemically defined	WS
	2924	Carboxyamide-function compounds; amide-function compounds of carbonic acid	WS
	2932	Heterocyclic compounds with oxygen hetero-atom[s] only	WS
	2934	Nucleic acids and their salts, whether or not chemically defined; heterocyclic compounds (excl. with oxygen only or with nitrogen hetero-atom[s] only)	WS
	2936	Provitamins and vitamins, natural or reproduced by synthesis, incl. natural concentrates, derivatives thereof used primarily as vitamins, and intermixtures of the foregoing, whether or not in any solvent	WS
	2937	Hormones, prostaglandins, thromboxanes and leukotrienes, natural or reproduced by synthesis; derivatives and structural analogues thereof "incl. chain modified polypeptides", used primarily as hormones	WS
	2940	Chemically pure sugar, except for sucrose, lactose, maltose, glucose and fructose; Ethers, acetylates, sugar stearates and their salts, other than the products mentioned in sections 2937, 2938 or 2939	WS
Essential oils and resinoids; perfumery, cosmetic or toilet preparations (33)	3301	Essential oils, whether or not terpeneless, incl. concretes and absolutes; resinoids; extracted oleoresins; concentrates of essential oils in fats, fixed oils, waxes or the like, obtained by enfleurage or maceration; terpenic by-products of the deterpenation of essential oils; aqueous distillates and aqueous solutions of essential oils	WS
	3302	Mixtures of odoriferous substances and mixtures, incl. alcoholic solutions, based on one or more of these substances, of a kind used as raw materials in industry; other preparations based on odoriferous substances, of a kind used for the manufacture of beverages	WS

Soap, organic surface-active agents, washing preparations, lubricating preparations, artificial waxes, prepared waxes, polishing or scouring preparations, candles and similar articles, modelling pastes, 'dental waxes' and dental preparations with a basis of plastersoap, organic surface-active agents, washing preparations, lubricating preparations, artificial waxes, prepared waxes, polishing or scouring preparations, candles and similar articles, modelling pastes, 'dental waxes' and dental preparations	3402	Organic surface-active agents (excl. soap); surface-active preparations, washing preparations, incl. auxiliary washing preparations, and cleaning preparations, whether or not containing soap (excl. those of heading 3401)	WS

with a basis of plaster (34)			
	3402		WS
Albuminoidal substances; modified starches; glues; enzymes (35)	3502	Albumins, incl. concentrates of two or more whey proteins containing by weight > 80% whey proteins, calculated on the dry matter, albuminates and other albumin derivatives	WS
	3503	Gelatin, whether or not in square or rectangular sheets, whether or not surface-worked or coloured, and gelatin derivatives; isinglass; other glues of animal origin (excl. those packaged as glue for retail sale and weighing net <= 1 kg, and casein glues of heading 3501)	WS

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