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Global Agricultural Information Network

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Saudi Arabia

Food and Agricultural Import Regulations and Standards - Narrative

FAIRS Country Report

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Report Highlights:

This FAIRS Country Report contains regulatory requirements and procedures for importing food and agricultural products into Saudi Arabia. The Food Laws Section of this report provides an update on Saudi policy changes that affect food and agricultural trade such as the import ban on U.S. beef and beef products as well as related restriction on the imports of pet foods containing beef products. The report also contains the Saudi requirements for nutritional labeling, health benefit statements on labels of prepackaged food products, food allergens labeling, biotech labeling and the approved procedures in dealing with pesticide residues limits in foodstuffs.

Disclaimer

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in (Riyadh, Saudi Arabia) for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate either because policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped. FINAL IMPORT APPROVAL OF ANY PRODUCT IS SUBJECT TO THE IMPORTING COUNTRY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY.

Section I. Food Laws:

At the present time, Saudi Arabia does not have a national food law. The Saudi Food and Drug Authority (SFDA) is the government agency that is responsible for establishing laws concerning food and agricultural products and ensuring that established standards are implemented for both locally produced as well as imported processed food and animal feed products. The SFDA is an autonomous agency chaired by the Crown Prince and reports directly to the King. SFDA has a Board of Directors that consists of eight Ministers, including Health, Commerce and Industry, Agriculture, Water & Electricity and Finance. The Board of Directors also includes the Executive President of SFDA and members from other organizations, such as Saudi Arabia Standards Organization (SASO), the Council of Saudi Chambers of Commerce and Industry, and food and drugs experts. All food, drinks and edible agricultural products, including food ingredients and processed animal feed whether locally manufactured or imported to Saudi Arabia are required to comply with regulations and standards laid down by SFDA or the Gulf Standardizations Organization (GSO). Since 1972, Saudi Arabia has issued more than 1,000 production and testing standards for food and agricultural products. The SFDA is currently in the final stages of drafting a comprehensive national food law that is expected to be completed within a year.

SFDA works with the Environmental Protection Department at the Ministry of Municipality and Rural Affairs (MOMRA) to issue nationwide food sanitation laws and guidelines. MOMRA's inspectors at the municipality levels are responsible for monitoring of food products already in the market. They inspect retailers, wholesalers, restaurants, bakeries, fast food chains, vegetable and meat markets for expiration dates, sanitary and storage conditions as well as product handling. Outlets found selling unhygienic or expired products are exposed to stiff financial fines, temporary closure or both.

Imported and locally produced food products are subject to the same food safety regulations and labeling requirements. The SFDA inspects food and processed feed products at Saudi ports of entry and at domestic production facilities. It conducts tests on imported as well as domestically produced foods, processed feed and animal products mostly at SFDA own laboratories, but it uses other government agencies laboratories or accredited domestic private laboratories when needed. The SFDA will take over inspection of imported unprocessed animal feed, fruits, and vegetables from the Ministry of Agriculture by the end of 2014. Fines are levied and products are destroyed for severe violations. U.S. exporters are encouraged to consult closely with Saudi importers on product requirements prior to shipment.

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

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

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

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

Non-Tariff Barriers

There are few important regulatory and non-tariff barriers currently facing U.S. food product exporters in the Saudi market listed below

1. Saudi Ban on U.S. beef Exports:

A temporary ban on imports of U.S. beef and beef products that was imposed by SFDA on May 9, 2012 is still effective despite several exchanges of official letters between USDA\USTR and the SFDA. Some progress has been made with the SFDA accepting a U.S. epidemiological report concerning the BSE situation in lieu of its requirement for an audit of the overall animal health situation and risk assessment in the U.S. However, the SFDA has stipulated that it will effectively open the Saudi market for U.S. beef and beef products subject to two conditions:

- The SFDA inspection, approval and registration of U.S. beef establishments that want to export to Saudi Arabia. The SFDA will charge about \$48,000 inspection cost per facility.
- Limit exports to boneless beef cuts that must come from cattle less than 30 month-old. The SFDA, however, has indicated that it would review this requirements in light of the recent OIE's re-classification of the BSE situation in the U.S. as "Negligible risk."

2. Ban on U.S. Pet Food Containing Bovine Meat and Products

In December 2012, SFDA banned imports of U.S. pet food containing bovine meat and fat without a prior announcement or a notification to Saudi Arabia's trading partners via the proper WTO channels. Saudi importers learned about the ban when their U.S. pet food containers arrived at Saudi ports of entry and refused Customs clearance. SFDA later stated that the import ban on U.S. beef and beef products also applies to pet food products containing beef products or ingredients as well as fats.

3. Ban on Ruminant Animal Feed in Poultry Production

The SFDA regulations for poultry meat production require that health certificate accompanying shipments of poultry meat must clearly indicate that the birds slaughtered had not been fed with animal protein, animal fats, or any animal byproducts. On July 5, 2012, FSIS updated its Export Library entry for Saudi Arabia to include the new SFDA requirements. In order for FSIS to issue the required animal protein free certification, U.S. exports of poultry and poultry products to the Kingdom should come from slaughter facilities that participate in the Agricultural Marketing Service's (AMS) Animal Protein Free Verification (APFV) Program for Poultry. Information about this program can be found at [AMS' Website](#).

4. Other Bans

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

Section II. Labeling Requirements:

As a member of GCC countries, Saudi Arabia has implemented Gulf standards GSO 9/2007.

A. General Requirements

All imported and locally produced prepackaged food products must meet labeling requirements as indicated in GSO 9/2007. According to this GCC-wide standard, prepackaged food product labels should be in Arabic or include an Arabic language translation of the label. Labels must contain at a minimum: product name, packer's name, country of origin or manufacture, listing of ingredients, instructions where applicable, for the end use of the product, and the shelf-life of the product.

The SFDA has started a strict implementation of all labeling requirements specified in GSO 9/2007. For example, section 7/2 the GSO 9/2007 requires that food manufacturers must affix Arabic language stickers on labels of exported prepackaged food products. In the past, Saudi Arabia has allowed importers or consolidators to place Arabic language stickers on prepackaged products at their warehouses. SFDA has also started strict implementation of Section 5/4 of GSO 9/2007 that calls for a clear declaration of the name and address of the manufacturer, packer, distributor, importer, exporter or vendor of pre-packed food products. In the past, SFDA has not required the names of foreign manufacturers or their Saudi importers included on products labels and it was acceptable to only declare the names of foreign exporters or distributors.

B. Requirements for Nutritional Labeling

On May 15, 2013, the SFDA announced its intention to enforce the implementation of the GCC regulations concerning disclosing nutritional information on food product labels that was issued in 2012. The SFDA announcement stated that Saudi Arabia will enforce the GSO regulation 2233/2012, which requires the disclosure of nutritional information on the labels of imported as well as

domestically produced prepackaged food products such as the amount of calories, carbohydrates, proteins, fats and other components that may affect the product's nutritional value or consumers' health or safety.

The SFDA has advised the Saudi Chambers of Commerce to inform their members of food importers and domestic producers of to strictly follow pertinent regulations GSO 9/2007 "Labeling of Prepackaged Food Products and GSO 2233/2012 "Requirements of Nutritional Labeling ." The SFDA has given the Saudi food importers and local producers a grace period of six months to comply with the new GSO regulations in order to avoid the product's rejection or preventing its sale in the market. The SFDA indicated that the reason for enforcing the GSO nutritional labeling requirements is to provide the Saudi consumers with the needed nutritional information to make an informed buying decision and to protect the commercial interest of Saudi food industry.

C. Rejection of Health Benefit Statements on Labels of Prepackaged Food Products

In the second half of 2013, the SFDA started to vigorously implement its April 2011 regulations that bans what is called "misleading health benefits claims" on labels of prepackaged food products. Accordingly, SFDA will not allow Customs clearance of prepackaged food products with such statements on their labels:

Claims Referring to Reduction of Diseases Risk

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

Claims Referring to Children's Development and Health

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

Claims Referring to Children’s Development and Health-continued

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

Other Claims

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

Other Claims-continued

	Food Product	Claim
11	Black tea extracted from <i>Camellia sinensis</i>	<ul style="list-style-type: none"> • Helps to promote attentive and concentration
12	Using Docosahexaenoic Acid (DHA) as a raw material for foods/food supplements	<ul style="list-style-type: none"> • Promotes antioxidants in the cells of the human body.
13	Tea	<ul style="list-style-type: none"> • Rich natural source of flavonoids (Antioxidants). • Stimulates mental clarity. • Increase vitality. • Rich in antioxidants and thiamine which helps protecting the body. • Helps stimulating the mind and the body. • Considered one of healthiest types of tea. • Healthy.
14	Products of potassium salts and ammonium salts	<ul style="list-style-type: none"> • Used for diet. • Doesn't cause high blood pressure.
15	Coffee	<ul style="list-style-type: none"> • For mental clarity and mood-altering • Stimulates vitality
16	Peanut butter	<ul style="list-style-type: none"> • Energy, strength and smartness

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

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

E. Additional Labeling Requirements

In addition to requirements per GSO 9/1995 (which was replaced by GSO 9/2007), the following labeling information must be declared for food additives and antioxidants used in foodstuffs:

- For coloring matters, their mixtures, preparations and diluents used in foodstuffs, the following additional information must be declared:

1. Common name
2. Color index number
3. Name of solvent or diluent
4. Production and expiration dates in a non-coded manner (day-month-year)
5. Dye purity
6. The statement "Free from alcohol"
7. The statement "Color matter for use in foodstuffs."

- For Flavors permitted for use in Foodstuffs common name and code number (if found) must be declared on food products containers contained flavors.

- For preservatives permitted for use in food products, common name or EEC number and a statement "Preservative for Use in Food Products" in case of preservatives containers.

- For emulsifiers, stabilizers and thickeners permitted for use in foodstuffs, the following additional information must be declared:

1. Common name or EEC no.
2. In case of gelatin, lecithin and mono and diglycerides the source shall be mentioned.

- For Sweeteners Permitted for Use in Food Products:

1. The name of sweeteners or INS numbers
2. Food products formulated specifically for use by diabetics or for other special nutritional uses shall contain the statement "Food for special dietary use or food for diabetic."
3. The amount of sweeteners matter, mg/liter or kg in case of using combination of sweeteners, the amount of each in combination shall be declared.

- The following warning must be declared:

4. In case of aspartame, "Not to be used by persons who have phenyl ketonuria."
5. In case of saccharine, "Use of this product may be hazardous to your health because it contains saccharin which has been determined to cause cancer in laboratory animals."
6. In the case of sugar alcohol "Excess of consumed quantity may cause diarrhea."

- The following additional labeling information must be declared for antioxidants permitted for use in foodstuffs:

1. Common name or EEC number
2. A statement "Antioxidants permitted for use in foodstuffs" in case of

antioxidant containers.

E. Labeling Requirements for Prepackaged Foods for Special Dietary Use

In addition to the general labeling requirements as stated in GSO 9/2007, further information must be declared for prepackaged foods for special dietary use per GSO Standard No. 654/1996. This standard is concerned with the general requirements for prepackaged foods for special dietary uses. It includes foods for infants and children sold only in pharmacies. It does not apply to foods sold supermarkets and other retailers.

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

The following requirements shall be met in prepackaged foods for special dietary uses:

- The product shall be completely free from pork products or their derivatives.
- It shall be registered by the Saudi Ministry of Health (MOH). Note that infant formulas and baby foods such as Similac, ready-made soft and wet foods, breakfast cereals, dry finger foods including biscuits, snacks are not considered foods for special dietary uses and there are registration requirements for them. All imported baby foods and formulas are inspected by SFDA at Saudi ports of entry and must comply with pertinent GSO or Saudi quality regulations and standards.
- It shall not be pharmaceutically packaged in a way suggesting that it is a drug.
- It shall be offered for sale in places separated from the ordinary foods in supermarkets. Foods for special dietary uses for infants and children shall be dispensed only by pharmacies, hospitals and children care centers.
- Artificial sweeteners are not permitted to be used in all baby and infant foods.

F. Food Allergens Labeling

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

- As per article 5/2/4 and 5/27 of Saudi Standard No 1/2007, the label should indicate the raw materials used in the processing of food products and their allergenic ingredients such as cereals (wheat, barley, oat and rye) containing gelatin whether natural or halogenated and their products (such as bread, rusk and cake) crustaceous and their products (such as shrimps, crabs, lobsters

and oysters) eggs and their products (such as pies, cakes, biscuits, custards, and noodles), fish and their products, nuts, peanuts soybeans, walnuts and their products (such as peanut butter, sauces and creams), milk and their products because of their protein contents (such as yogurt, cheese, chocolate, creams, pudding, milk sauce, and custard), sulphites when added at a concentration of less than 10 ppm (example: raisin, dried fruit and beverages).

- If a product is obtained by means of biotechnology, it must be clearly stated on the label. This technology causes allergens to be carried over to the products mentioned in article 1.

G. Biotech Labeling

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

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

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

2. Bilingual labeling: Labeling and adjoining explanatory statements shall be in Arabic and, where another language is used, it shall be alongside the Arabic. All information that is provided in another language shall be identical with those written in Arabic. The biotech statement must be clearly written in Arabic and English languages, in the same font size and different color from that of the main product label.

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

- Composition
 - Mode of storage and packing
 - Nutritional value or nutritional effects.
 - Intended use of product.
 - Any implication on certain group of people, or certain animals or the environment.
 - Physical characteristic (color, taste, odor, and the touch).
 - Methods for the safe handling, storage, transport and use.
- If the food product does not have a conventional counterpart, the labeling shall contain appropriate information about the nature and characteristics of the food product concerned.
 - If the mode of storage, preparation or cooking of the product is no longer equivalent to or differs significantly from the corresponding conventional food, a clear instructions as to how to use must be given on the label of the product.

3. Health certificate: Biotech agricultural products exported to Saudi Arabia and GCC countries must have been approved in the country of origin for human or animal or consumption or planting seeds. Each shipment must be accompanied by a health certificate issued by competent government agency stating that the GE ingredient used in the foodstuff and grains is approved in the country of origin for human or animal consumption or for planting seeds.

4. Real Time Polymerase Chain Reaction (PCR) Method: Saudi Arabia implements PCR Real Time Method for GE testing. Samples for laboratory analysis are taken according to GSO ISO standards numbers 21098, 21569, 21570, 21571, 21572 and 24276. Currently it costs \$400 per sample to conduct PCR GE test in Saudi Arabia.

5. Biotech health certificate: SFDA accepts health certificates issued by FDA, federal or state departments of agriculture for high value and processed feed products. Health certificates issued by exporting companies or other private organizations, including notary public statements are not recognized.

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

Section III. Packaging and Container Regulations:

In 1997, Saudi Arabia issued standard No. SSA 1149/1997 entitled Food Packages-part 1-General Requirements. Some of the main requirements are listed below:

- All packaging materials used in fabricating, forming, or treating packages shall be of food grade for contact with foods and in compliance with relevant Saudi standards.
- They shall be clean and in a condition that does not allow any contamination probabilities of the

contained material.

- They shall maintain the properties of the packaged material and protect it from gaining undesirable odors, flavors and tastes.
- They shall offer protection to the product against contamination with microorganisms, insect, rodents, and dirt in the cases of products that requires it.
- They shall be impermeable to moisture in the cases of food products that require it.
- They shall offer necessary protection against environmental conditions and mechanical hazards such as impacts, vibration, static stresses, and they shall be in an intact appearance during handling.
- They shall not affect the container as a result of migration of some of their constituents that may react or be mixed with the food materials.
- It shall not be in a pharmaceutical shape.

Saudi standard No. SASO 1301/1997 deals with specifications for the general requirements of plastic packages used for packaging food materials. The three page regulations require limits among other things that the concentration of a vinyl chloride monomer not to exceed 1 mg per kg of the plastic material, or 0.01 mg per kg of the packaged food material if the packages are made of polyvinyl chloride (PVC).

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

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

Section IV. Food Additives Regulations:

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

- An eight-page GSO Standard No. 23/1998 entitled “Coloring Matter Used in Food Stuff.” This standard is concerned with natural and synthetic coloring matter added to foodstuffs prepared for human consumption.

In June 2011, the GSO Standards Committee decided not to implement the ban on E102 and E122. In 2010, Saudi Arabia banned the use of Red 2G in foodstuffs.

Note that SFDA and GSO have removed E128 from allowable coloring matters used. As such, E128 is

not allowed for use as a coloring matter in foodstuffs.

A. Preservatives Permitted for Use in Food Products per Gulf Standard No. 356/1994

1- Scope and Field of Application

This standard is concerned with preservatives permitted for use in food products.

2- Complementary References

2.1 GS 9/2007 “Labeling of Prepackaged Foods”.

3- Definition

3.1 Preservatives: Any additives which inhibit, or arrest decomposition of foodstuffs by micro-organism.

- 4.1 No preservatives other than those mentioned in the Table, shall be used in food products.
- 4.2 Use of sulfite compounds is not permitted in fresh vegetables and fruits.

D. GSO standard number 381, defines Emulsifiers, Stabilizers and Thickeners Permitted for use in Food Products as follows:

- **Emulsifiers:** Substances which, when added to a foodstuff, aid the formation of uniform dispersion of two or more immiscible substances.
- **Stabilizers:** Substances which, when added to a foodstuff, aid the maintenance of a uniform dispersion of two or more immiscible substances.
- **Emulsifiers, Stabilizers and Thickeners Permitted for use in Food Products**
- **Thickeners:** Substances which, when added to a foodstuff, increase its viscosity.

Section V. Pesticides and Other Contaminants:

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

Gulf Standard No. 382/1994 “Maximum Limits for Pesticide Residues in Agricultural Food Products-

Part 1” established the maximum limits for ten pesticide residues in foods and agricultural commodities or animal feed: Malathion, Bromophos, Diquat, Fenchlorfos, Pyrethrins, Quintozense, Parathion, Orthophenyl Phenol, Methidathion and Fentin.

Gulf Standard No. 422/1994 “Maximum Limits for Pesticide Residues in Agricultural Food Products-Part 2” establishes the maximum limits for nine pesticide residues in agricultural and food products intended for human consumption. The residues are: dimethoate, chlorfenvinphos, crufomate, diazinon, dioxathion, diphenyl, diphenylamine, ethoxyquin and folpet.

Gulf Standard No. 357/1994 “Antioxidants Permitted for use in Foodstuffs” lists antioxidants and antioxidants synergists permitted for use in food products. Refer to appendix II for permitted antioxidants.

Gulf Standard No. 841/1997 regulates the maximum limits aflatoxins permitted in foods and animal feeds.

Gulf Standard No. 988/1998 is concerned with limits of radioactivity levels (gemma rays, cesium 134, 137) permitted in foodstuffs, drinking water and animal feeding stuffs.

Gulf Standard No. 382/1994 “Maximum Limits for Pesticide Residues in Agricultural Food Products-Part 1”.

Requirements

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

Maximum Limits of Pesticide Residues Permitted in Agricultural and Food Products – Part 2 (GSO 383/1994). **Also refer to the recent SFDA circulars on pesticide MRLs in food products number 3965 and 1418 discussed earlier.**

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

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

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

1. Mandatory Compliance with Pesticide MRLs in Food Products

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

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

Section VI. Other Regulations and Requirements:

A. Product Registration

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

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

- 1. Table of contents
- 2. An Authenticated copy of the agency registration certificate at the Saudi Ministry of Commerce and Industry.
- 3. When registering for herbal products, a copy of pharmaceutical wholesale license should be submitted by the local agent.
- 4. Certificate (s) issued by the health authorities in the country of origin clearly stating that the following should be provided:

The company is licensed to manufacture the products in the country of origin (state license number and date).

The company is permitted to sell the product in the country of origin (certificate of free sale)

The company follows good manufacturing practice.

Coloring agents, diluents and other incorporate substances in the product formula are permitted in the country of origin (if the free sale certificate states such information it will be sufficient).

Package insert and applicable information stated on the pack are the same as that approved and currently marketed in the country of origin. Package insert shall be in Arabic and English languages. The company is obliged to add and/or delete any information required for handling the product in the Kingdom as determined by the registration committee.

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

Registration number and date and date of marketing in the country of origin.

Trade and/or generic name.

Full composition (the scientific name of active and inactive ingredients and their quantities)

Therapeutic category (if any).

The composition of product to be exported to the kingdom is the same as that market in the country of origin.

Names of countries where the product is currently marketed.

A certificate of analysis indicating the results of completed analyses for the submitted samples.

If the product contains ingredients of animal source the kind of animal must be specified.

Percentage of alcohol in the finished product, if present, should be indicated with justification of that percentage.

- 6. Full specifications and methods of analyses of the finished product, as well as stability study and data including storage conditions.
- 7. Six samples of the product as well as samples of the outer package and product's label.
- 8. Abstracts of scientific references brochures and international scientific periodicals testifying to the efficacy and safety of the product.

B. Products Inspection

With the exception of herbal preparations, health and supplementary foods (inspected by the Ministry of Health) and live animals, plants, seeds and grain animal feed (inspected by the Ministry of Agriculture), all imported foodstuffs are inspected by the SFDA at the port of entry.

SFDA's Border Inspection Posts (BIPs)

Imported foods are inspected independently by SFDA inspectors at a Saudi port of entry without any interference from the SFDA headquarters in Riyadh. If imported consignment is in compliance with pertinent Saudi or GCC standards and regulations, it is cleared. Otherwise, it is rejected. The domestic importer has no access to SFDA internal report during the process. SFDA informs the importer its final decision whether to clear the product for sale in Saudi Arabia or reject it due to lack of compliance with established standards or regulations. Reject products have to re-exported or destroyed domestically under SFDA's supervision.

SFDA's mandatory a four stage verification process at BIPs involves the following:

- Required documents verification
- Identity check
- Physical examination
- Laboratory test

Failure to comply with pertinent Saudi or GCC standards and regulations at any of the above stage may result in a rejection of the imported food product.

If a product is rejected by one of SFDA's BIPs for alleged lack of adherence to established specifications at any of the above four stages, the local importer has the right to appeal the decision in writing to the Executive Department of the Imported Food Control (EDIFC) at the SFDA headquarters and ask for reconsideration of the inspection results. In such cases, EDIFC forwards appeal to SFDA's special committee that studies shipment documentation and the BIP test results to verify compliance with established rules and regulations. If the BIP action was found to be in compliance with the rules and regulations pertain to the rejected product, then EDIFC considers the BIP findings and decision as final. If, for any reason, there was a misjudgment by the BIP inspectors, EDIFC repeals the decision and inform the importer to clear the consignment cleared from Customs.

C. Imports of Samples

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

D. Foodstuff Monitoring

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

E. Certification and Documents Requirements

All food products, whether imported for commercial purpose, or for display, or for sampling, must be fit for human consumption and should be within the shelf life set. The products must have a label or sticker showing the statutory information such as product name, country of origin, producer's name and address, production and expiry dates, etc. Bilingual labeling (Arabic/English) is required if the products are commercially imported. English labeling is sufficient for foodstuffs imported for display or sampling purposes.

For commercial importation, the following documents are required:

- Commercial invoice showing FOB price, freight and CFR value
- Certificate of origin
- Halal slaughter certificate for meat and meat products. Halal certificate is also required for cheese and cheese products if they contain rennet of animal origin.
- Health certificate from the country of origin
- Phytosanitary certificate for grain, grain products, edible nuts, fruits, vegetables, etc,
- Bill of lading or airway bill.
- Packing list (highly recommended to expedite product inspection and clearing process)
- Weight list (for grain)

Saudi Customs accepts the original commercial invoice and country of origin certificate attested by a local chamber of commerce and industry located in a city or area where the foodstuffs are purchased and shipped. Certificates number three to five listed above must be attested by any of the Saudi missions located in the States. Before taking the certificates to a Saudi mission, U.S. exporters must make sure that the certificates were first authenticated by any U.S./Arab Chamber of Commerce, U.S. Saudi Arabian Business Council or U.S. Chamber of Commerce located in the city or area where the exporting firm is based.

For small samples, simple documentation as follows is required:

- Invoice, showing consignee's name and address, details of product/s and also origin of goods.
- Packing list, if there are many items.

The above documents do not require legalization by the Saudi mission. An exporting company stamp and signature are sufficient. It is advisable to show on the invoice a nominal value of \$5 -\$10 for Customs purpose, with a statement that the goods are "Not For Sale – No Commercial Value"

For clearance of sea or airfreight cargo, a full set of documentation is required while for cargo sent by courier which do not require special certifications such as Halal, an invoice and country of origin certificate will be sufficient, provided the value is not more than \$3,000.

Section VII. Other Specific Standards:

A. Shelf Life

In December 2005, Saudi Arabia implemented a voluntary shelf life standard (manufacturer-determined use-by dates) for most foodstuffs with the exception of selected perishable foods (fresh or chilled meat and poultry; fresh milk and fresh milk based products; margarine; fresh fruit juice; table eggs, and baby foods) that must meet SASO's established mandatory expiration periods. The revised standard (SASO 457/2005) will no longer ban imports of food product with less than half of its shelf life remaining. In 2007, the SASO 457/2005 was converted to GSO standard number 150/2007.

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

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

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

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

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

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

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

A. Certificate of Islamic Slaughter

Per Saudi Arabia Standard No. SSA 630/1990 (Animal Slaughtering Requirements According to Islamic Law), a Certificate of Islamic Slaughter must be issued for all meat and poultry products entering the Kingdom of Saudi Arabia. This certificate issued by Islamic institutions recognized by the Saudi Embassy or Consulates in the United States. Information related to the approved Islamic institutions may be obtained from the Saudi Embassy in Washington or the nearest Saudi Consulate (New York, Houston, or Los Angeles). Such certificates contain language certifying Islamic slaughter. The following language was taken from a recently issued Islamic Slaughtering certificate issued in the United States:

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

A. Halal Certificate

Poultry and livestock slaughtering has to take place in an officially licensed slaughterhouse and in accordance with Islamic slaughtering procedures: GS 993/1998 “Animal slaughtering Requirements According to Islamic Law”.

C. Certificate of Islamic Slaughter

A certificate of Islamic slaughter must be issued for all poultry and livestock meat and products entering the Kingdom of Saudi Arabia. This certificate is issued by Islamic Centers in the United States approved by the Saudi Embassy or Consulates. The certificate must be attested by the Saudi Embassy or Consulate in the U.S. before the poultry meat is shipped to Saudi Arabia.

A. Baby Foods

There are two Saudi Arabian standards that establish quality specification for baby foods. Canned baby foods and infant foods based on milk are regulated by SSA 676/1992 and SSA 675/1994 respectively.

F. Hazard Analysis and Critical Control Point (HACCP)

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

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

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

Based on the need to protect consumer safety and health, it is required to implement the HACCP regime in all abattoirs producing meat and meat products. To facilitate this, a further Ministerial decree number

2436 was issued on February 8, 2003. The decision requires the insertion of a new clause, referred to as number 13, to the general regulations and condition to be followed when meat and meat products are imported to Saudi Arabia. The text of the clause # 13 should read as follows:

“The abattoir (s) implements HACCP procedures in all stages of meat and meat”

G. Animal Quarantine Regulations

Over the years, Saudi Arabia has banned cattle, meat and meat products imports for health reasons. Cattle imports from countries affected by Mad Cow disease, or Bovine Spongiform Encephalopathy (BSE), Foot and Mouth, and Cattle Plaque diseases have been banned for several years. Cattle imports from countries not affected by the diseases are subjected to strict quarantine regulations on arrival at Saudi ports. The country also bans meat and meat derivatives from countries affected by BSE (the Kingdom banned live cattle and cattle meat imports from Washington State, Alabama and Texas due to confirmed cases of BSE in those states). Saudi Arabia also banned transshipped livestock meat through countries banned from exporting meat and meat products because of infestation by BSE, FMD and other animal diseases. In addition it requested additional statements on the health certificate accompanying livestock and poultry meat shipment to indicate that the animals slaughtered for export to the Kingdom were not fed animal ruminants and were not treated with growth hormones.

Imports of live poultry, poultry meat (mostly from developing countries) and hatching eggs are banned from countries affected by bird flu. Imports of live poultry are also banned from countries with the West Nile Virus epidemic.

Section VIII. Copyright and/or Trademark Laws:

Royal Decree No. M/5 and Resolution of Council of Ministers No. 75 dated 1984 regulate trademark registration laws in the Kingdom. According to the decree, trademarks are registered with the Trademark Registration Department of the Saudi Ministry of Commerce and Industry through a local agent or lawyer.

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

Section IX. Import Procedures:

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

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

Customs Clearance

As stated earlier, foodstuff shipments must be accompanied by commercial invoice, health certificates and other documents listed in Section VI (Certification and Documents Requirements). An importer translates the commercial invoice into Arabic language (per Saudi customs requirements) and hands it to his customs clearing agent along with the other required documents in order to start customs clearing process. Containers can be cleared in less than ten days provided all required documents are in order and imported products meet Saudi Arabian/Gulf specifications. Lab officials pull samples from full consignments and testing is done fairly. If there is any dispute about test results or products are rejected by one of SFDA laboratories at a port of entry, importers can appeal for re-test to the Director General of the Quality Control and Inspections Department of the Ministry. If an appeal is accepted, the Director General orders a sample (s) sent and re-tested by another SFDA's laboratory located in a different port (city). If the second test authenticates the initial results, the exporter is ordered to re-export or destroy the product.

Appendix I. Government Regulatory Agency Contacts:

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

Dr. Salah Al-Maiman
Vice President Food Affairs
Saudi Food & Drug Authority
Tel: 966-11-203-8222 ext. 202
Fax: 966-1-275-1788
www.sfda.gov.sa

Mr. Mohammed Al-Issa
Director General
Environmental Protection
Ministry of Municipality and Rural Affairs (tests food products at points of sale make sure product meet safety standards)
Tel: 966-11-442-1593
Fax: 966-11-441-6748

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

Live animals & plants and animal feed are inspected by the Saudi Ministry of Agriculture (MOA). Following are coordinates of some the important departments.

Dr. Abdul Ghaniy Al-Fadhil
Director General
Plant and Animal Quarantine Department
MOA
Tel: 966-11-404-4292
Fax: 966-11-401-1323

Dr. Zohair Mulla
Executive Director
Feed Department
SFDA
Tel: 966-11-203-8222 Ext. 2208
Fax: 966-11-275-1367

Mr. Mohammed Al-Mazroa
Director General (registers and testes seeds as well as pesticides used in foodstuff)
Agricultural Research Department
MOA
Tel: 966-11-405-5848
Fax: 966-11-405-5848

Appendix II. Other Import Specialist Contacts:

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

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

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