

Voluntary Report – Voluntary - Public Distribution

Date: September 29, 2025

Report Number: IS2025-0020

Report Name: Israel Seeks Public Comments on Implementation of Changes to EU Regulations 10 2011 and 1925 2006 Related to Plastic Materials in Contact with Food

Country: Israel

Post: Tel Aviv

Report Category: WTO Notifications, Trade Policy Monitoring, Country/Regional FTA's, Policy and Program Announcements

Prepared By: Hila Zakay

Approved By: Jenny Morgan

Report Highlights:

On September 10, 2025, the Israeli Ministry of Health published a request for public comments on proposed amendments to European Union Regulations 10/2011 and 1925/2006. These amendments address plastic materials in contact with food and the addition of vitamins, minerals, and other substances to food. The publication, which has not yet been notified to the World Trade Organization, is open for public comment until September 24, 2025, 23:59 (Israel Standard Time).

A. The Purpose of Publication

Israel adopted European Union (EU) Regulations and Directives as part of Israel's "Food Reform" initiative (for more on the information see GAIN report: IS2024-0022: Israel Adopts Additional European Union Standards for Agricultural Imports). The Ministry of Health first published proposed changes to EU Regulation 10/2011 and Regulation 1925/2006 for public comments on February 26, 2025. Under the "Adoption by Reference" mechanism, Israel aligns its food regulations with updates made by the EU. **Regulatory changes are issued for public comment before being formally incorporated into Israeli food legislation.**

A. Submission of Comments

This publication (which has yet to be notified to the World Trade Organization) is open for **public comments until September 24, 2025, 23:59 (Israel Standard Time)**.

- To submit comments, users must first register on the [Tazkirim](#) website.
- Click the "Comment" button next to the document summary.
- Submit your response and attach up to three support files.
- Choose whether to make your comment public or private.
- Privacy settings can be modified at any time.

Commenters must specify their affiliation when submitting a response. The Israel Ministry of Health (MoH) National Food Service (NFS) reserves the right to invite submitters to present their positions before the professional team in the NFS or before the Director of the NFS. The National Food Service may utilize the content of the submitted documents to shape its position before publishing the NFS director's announcement in the records and may also publish them on the NFS website. Please note that the submission of a position paper in response to this request implies consent for publication, as explained above.

B. Amendment to EU Regulation (EU) No 10/2011 and Annex II to Regulation (EC) No 1925/2006

The listed regulations impact food products that may have additions of vitamins, minerals, and certain other substances, as well as plastic materials and articles intended to come into contact with food. A description of the modifications to EU regulation, which Israel plans to adopt, are found in Table 1.

Food imported or produced in Israel before the update takes effect may continue to be sold under the previous regulations until the shelf life expires, unless a different transitional rule is specified. The date upon which the "release certificate application" is submitted to the quarantine station will be considered the food's import date.

All modifications will be subject to the exclusions outlined in Israeli legislation¹ and the final draft notice once adopted. For more details, please see all related attachments for each amended regulation.

¹ https://www.nevo.co.il/law_html/law01/049_062.htm

Table 1: Details of EU regulation modification adoption into the Israeli Legislation

Name of EU Regulation Amending EU Regulation (EU) No 10/2011 ^{2,3}	General Description of Amendments	Implementation Date for EU Amended Regulation	Implementation Date for Israeli Legislation	Transitional Provision
Group 4 – Materials in Contact with Food - FCM:				
Commission Regulation (EU) 2025/351 of February 21, 2025, amending Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food, amending Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with food, repealing Regulation (EC) No. 282/2008, and amending Regulation (EC) No. 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food as regards recycled plastic and other matters related to quality control and manufacturing of plastic materials and articles intended to come into contact with food⁴	<p>Detailed amendments to various sections and annexes of Regulation 10/2011, including updates to definitions, purity standards, authorized substances, recycled and reprocessed plastic, labeling requirements, documentation and compliance, testing and amendments to related regulations.</p> <p>Exceptions to Adoption of EU Regulation: Amendment (4) adds subsection (f) to Article 4 of Regulation 2011/10, requiring compliance with EU Regulation 2022/1616 on recycling plastic materials that come into contact with food. However, under Israeli law (Section 3a(a1)(1)), EU regulations that are not explicitly adopted do not automatically apply unless specifically stated in Annex II A. Israeli Standard 5113 provides businesses with two options for using recycled materials:</p>	March 14, 2025	October 15, 2025	<p>(1) It will be possible to continue marketing plastic materials and products until stock is depleted, provided they were marketed before September 16, 2026.</p> <p>(2) In cases involving intermediate products used in the production of plastic materials and products, or materials intended for the production of such materials or products, which comply with Regulation 10/2011 as it was prior to the effective date of the update in Israel, and were first marketed after December 16, 2025 but do not comply with Regulation 2025/351, a declaration of compliance must be attached. This declaration must state that the product does not comply with the</p>

²Link to consolidated text: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02011R0010-20250316>

³ **Entities Affected according to the exceptions listed in Column A of Item 16 in the Second Addendum A (Public Health Protection Order (Food))**

Importers: Importers who bring food into Israel *under the European compliance pathway* must ensure that the plastic materials and products in contact with food meet the updated requirements.

Manufacturers: Manufacturers holding a "Good Manufacturing Practice" certification or a commitment approval under Section 321a of the Public Health Protection Law (Food) must comply with the updated standards for plastic materials used in food-contact applications.

Distributors/Retailers: Distributors and retailers who purchase or receive food from *compliant importers or manufacturers* must ensure that the packaging and food-contact materials meet the new regulations.

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32025R0351>

	<p>Follow the updated European legislation, including Regulation (EU) 2022/1616.</p> <p>Follow U.S. legislation. The decision is left to the business operator's discretion.</p> <p>Reference to Additional Changes:</p> <p>For the detailed changes listed in item 1 of the annex to the order (Regulation 2025/351), a reference to their publication in European legislation in English has been provided. For convenience, a link to the updated consolidated text in English, which includes the changes incorporated into EU Regulation 10/2011, is referenced.</p> <p>It is important to note that this consolidated text also includes an additional amendment (Regulation 2024/3190), which has not yet been adopted in Israel. This amendment further modifies Regulation 10/2011.</p> <p>Link to consolidated text</p>			<p>provisions of Regulation 2025/351 and that it may only be used in the production of plastic materials and products intended to be marketed before September 16, 2026.</p>
--	--	--	--	--

Name of EU Regulation Amending EU Regulation (EC) No 1925/2006 ^{5,6}	General Description of Amendments	Implementation Date for EU amended Regulation	Implementation Date for Israeli Legislation	
Group 2 – Labeling, Including Messages and Prohibited/Restricted Substances in Food:				
Commission Regulation (EU) 2024/1821 of 25 June 2024 amending Annex II to Regulation (EC) No 1925/2006 of the European Parliament and of the Council and Annex II to Directive 2002/46/EC of the European Parliament and of the Council as regards iron milk caseinate added to foods and used in the manufacture of food supplements⁷	Addition of iron milk caseinate as a source of iron. ⁸	July 17, 2024 Until June 4, 2028, only Société des Produits Nestlé S.A. is allowed to market iron milk caseinate in the European Union. This is based on the rules outlined in EU Regulation 2023/949 (issued on May 12, 2023), which approved iron milk caseinate as a novel food and updated Regulation 2017/2470	June 5, 2028	

Attachments:

[02-10.2011-Notice from the Director of the National Food Service - Google Translate.pdf](#)

[02-10.2011-Notice from the Director of the National Food Service - Hebrew Original.pdf](#)

[03-10.2011-Reason for Regulatory Impact Assessment \(RIA\) - Google Translate.pdf](#)

[03-10.2011-Reason for Regulatory Impact Assessment \(RIA\) - Hebrew Original.pdf](#)

[02-1925.2006-Notice from the Director of the National Food Service - Google Translate.pdf](#)

[02-1925.2006-Notice from the Director of the National Food Service - Hebrew Original.pdf](#)

[03-1925.2006-Reason for Regulatory Impact Assessment \(RIA\) - Google Translation.pdf](#)

[03-1925.2006-Reason for Regulatory Impact Assessment \(RIA\) - Hebrew Original.pdf](#)

⁵Link to consolidated text: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1925-20240717>

⁶ The version adopted in Israel was based on the EU legislation as of June 22, 2023. However, the regulation was not fully implemented, with certain exceptions outlined in columns A and C of item 7 in Annex II A, in addition to the exceptions specified in Section 3a(a1) through (a5) of the law.

⁷ <https://eur-lex.europa.eu/eli/reg/2024/1821/oj/eng>

⁸ The EU list of novel foods has not been adopted in Israel and is therefore not considered an adopted provision under Section 3a(a1)(1) of the law. Instead, it will be subject to local food legislation in accordance with Section 3a(a2) of the law.