



## Egyptian Import Refusals by the United States and the European Union (2010-2021): An Analysis

01.22 | USDA FUNDED TRANSFORMING THE INSPECTION AND  
ASSESSMENT OF FOOD BUSINESSES IN EGYPT (TAIB) PROJECT





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## Executive Summary

Despite advancements in food safety, over the years, there have been multiple refused shipments of agricultural and manufactured food exports from Egypt to the United States (US) and the European Union (EU). This report analyzes the refusal charges issued against food exports between 2010 and 2021 (of both agricultural products and manufactured food) from both the US and the EU, and provides recommendations to be considered by policy makers, business support organizations, industry representative bodies, the private sector, and other international organizations.

To develop this report, Egyptian export and refusal data provided by the US Food & Drug Administration (FDA) and the EU’s Rapid Alert System for Food and Feed (RASFF) was aggregated and analyzed. Data accessibility was limited by RASFF to the last 2 years (2020 & 2021), so complimentary data from other EU reports was used to capture import refusals by the EU between 2010 & 2019.

The report categorizes refusal charges into the following key groups:

### 1) Contamination charges referring to:

- a. **Chemical contamination** (products refused due to the presence of chemicals e.g. pesticides)
- b. **Physical contamination** (products refused due to the presence of unfit substances e.g. color additives)
- c. **Microbial contamination** (products refused due to the presence of microbes e.g. salmonella and aflatoxin)

### 2) Legislation charges referring to:

- a. **Mislabeled/misbranding** (products refused due to labeling and misbranding problems)
- b. **Manufacturing conditions** products refused due to producing the product in insanitary conditions)

Between 2010 and 2021, a total of 1,950 import refusals were issued by FDA, of which 81% were due to legislation issues (1,580). Out of those 81%, 88% (1330 refusals) were due to mislabeling/misbranding and only 12% (179 refusals) for manufacturing conditions. Contamination charges on the other hand accounted for 19% (352 refusals) of all refusal charges, with chemical contamination accounting for 40% (140 refusals), physical contamination accounting for 36% (127 refusals), and microbial contamination responsible for 24% (85 refusals). There is a weak association between specific charges and products, as most are refused for labelling issues as opposed to contamination. With regards to contamination charges, chemical contamination is most closely linked to fresh products and physical contamination for processed food. Specific products that appear to be repetitively refused for contamination include (in order of number of contamination charges): okra, sesame paste, cheese, leaf and stem vegetables, olives, candy, sesame seed, honey and grape jam.

Breakdown of Import Refusals to USA (2010 – 2021)	
<b>Legislation Charges – 81%</b>	
Mislabeled/Misbranding	88%
Manufacturing Conditions	12%
<b>Contamination Charges – 19%</b>	
Chemical Contamination	40%
Physical Contamination	36%
Microbial Contamination	24%



The EU does not enforce labelling requirements through border inspection, so rates of non-compliance are not recorded in RASFF data<sup>1</sup>. As such, all refusals recorded by RASFF are due to contamination only. Over the last 2 years (2020 and 2021), there has been a total of 145 contamination charges, of which 71% (103 charges) resulted from microbial charges and 29% for chemical contamination (42 charges). Despite a lack of data provided by the EU, our analysis shows two notably recurrent issues - oranges are continuously rejected for chemical contamination with pesticides, and groundnuts and peanuts are also often being charged for microbial contamination with aflatoxin. Other often rejected agro-food products such as herbs, spices, basil, vine leaves and grape leaves are refused for chemical or microbial contamination such as pesticide residues or salmonella.

Core issues pertaining to import refusals by the EU and US from Egypt were identified. These include the following:

- **Complexity and lack of understanding by exporters around the US FDA's legislation requirements** requires additional training and understanding by Egyptian exporters on labelling requirements to be able to access the US market.
- **Poor agricultural practices** as evident by the high rate of chemical contaminations (pesticides and others) in agro-foods. This is especially true for oranges.
- **A high presence of aflatoxins and lack of awareness from exporters** have led to a high occurrence of import refusals for Egyptian groundnuts and peanuts. Consistency of refusals over the years shows exporters lack of capacity to sort contaminated products and lack of proper inspection mechanisms to reduce such incidents.

The report provides the following recommendations to drive forward Egypt's competitiveness as an important player in the global trade market:

- 1) Increase exporters' awareness of the legislative requirements to access the US market** through export consultancies and informational products such as handbooks
- 2) Support exporting facilities to enhance manufacturing conditions and hygienic practices** through increased monitoring by relevant authorities, the enforcement of inspection before exporting, and training facilities on hygienic practices.
- 3) Develop mandatory mechanisms to control exporters of fresh and frozen food to reduce incidents of contamination** with a focus on higher-risk products or strategically important ones (e.g. oranges and peanuts). New exporters are those with a history of refused exports can be regulated more closely.
- 4) Support exporter's awareness of aflatoxin control through** developing a traceability system to identify suppliers of refused exports due to aflatoxin, and work with exporters to promote good agricultural practices to their suppliers and contracted farmers.
- 5) Promote continued awareness through** creating a portal of shared information and guidelines. This portal should provide regular analyses on import refusal charges and common challenges by exporters, propose solutions to identified common challenges faced by exporters, and provide updated statistics of rejection cases.

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<sup>1</sup> [https://www.unido.org/sites/default/files/2011-12/rejection\\_analysis\\_0.PDF](https://www.unido.org/sites/default/files/2011-12/rejection_analysis_0.PDF)



## Introduction

Egypt's agri-food sector, is one of Egypt's most important, serving as the third largest non-oil export sector and attracting significant investment opportunities. The agriculture and food processing sectors contribute 24.5% to the country's GDP and 23.2% of Egypt's workforce is involved in these sectors<sup>2</sup>. Outside the GCC region, the European Union (EU) and the United States (US) serve as the main agriculture and food export markets.

Over the years, there have been multiple shipments of agro-food and manufactured food exports from Egypt that were denied entry into US and EU markets for various reasons. These rejections represent loss economic opportunity for Egypt and it is important to understand the reasons for these rejections and to offer support to reduce refusal charges and ensure continued growth. This report aims to analyze the refusal charges issued against food exports (of both agro-food and manufactured food) from both the United States and the European Union and provide viable interventions to mitigate these issues in the future. The report provides recommendations to be considered by policy makers, business support organizations and industry representative bodies, the private sector, as well as international organizations.

## Methodology

This report is based on secondary sources provided by the US Food & Drug Association (FDA) and the EU's Rapid Alert System for Food and Feed (RASFF).

The study is divided into three stages:

- 1. Data collection and aggregation:** Data was collected from the two sources and aggregated into one database to be able to sort, filter and analyze. Key sources of data are:
  - Egyptian import refusals by FDA data for the years 2010-2021: [Import Refusal Report \(fda.gov\)](https://www.fda.gov/oc/food-safety/food-recalls)
  - Egyptian import refusals by RASFF data for the years 2020 and 2021: <https://webgate.ec.europa.eu/rasff-window/screen/search>
  - Selective cases for Egyptian import refusals by RASFF for the years 2010-2018 collected from annual reports.<sup>3</sup>
  - The Observatory of Economic Complexity (OEC).
- 2. Data categorization and classification:** Due to inconsistencies in data provided by RASFF and the FDA, and due to the multiplicity of charges names and codes, the study classified refusal charges into two main categories that are inclusive of all types of refusals. These categories are as follows:

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<sup>2</sup> [https://www.unido.org/sites/default/files/files/2020-09/IGGE\\_Agrifood\\_and\\_COVID19.pdf](https://www.unido.org/sites/default/files/files/2020-09/IGGE_Agrifood_and_COVID19.pdf)



- **Contamination charges:** Refers to refusal charges that relate to the presence of chemical substances and pesticide residues above the maximum accepted rates. For further analyze the data was disaggregated into the following subcategories:
  - *Chemical contamination* (products refused due to the presence of chemicals - e.g. Pesticides)
  - *Physical contamination* (products refused due to the presence of unfit substances - e.g. color additives)
  - *Microbial contamination* (products refused due to the presence of microbes - e.g. Salmonella and aflatoxin)
- **Legislation charges:** Refers to refusal charges that are related to the manufacturing conditions as well as rejections due to labeling and misbranding problems. Within this classification, the following disaggregates were utilized:
  - *Mislabeling/misbranding* (products refused due to labeling and misbranding problems)
  - *Manufacturing conditions* (products refused due to unsanitary production conditions)

Annex 1 includes the classification of all charges per category by region.

3. **Data Analysis:** Data was filtered and compared across years, regions, and products. Data was then cross-compared to help provide explanations of trends and refusal charges.

The database attached with this report includes explanations of calculation methods for each data set.

### Limitations:

Recently, RASFF has limited access to import refusal data beyond the last two years<sup>4</sup>. As such, this report resorted to the use of annual reports published by RASFF to cover the data gap from 2010 to 2019. This has caused data for the EU to be incomplete, as annual reports are not inclusive of all cases and inconsistent in terms of the amount and quality of data. For example, some annual reports just state number of refusals from Egypt without stating the reasons, and in other reports, the annual report would only mention main refusal charges from a single commodity as a significant repetitive case (e.g. number of refusals for groundnut due to the presence of aflatoxins). Thus, this study employed an adaptive methodology, reporting on import refusals from the EU between 2020 and 2021 separately from data found in annual reports, as they cannot be accurately compared.

## Food Trade: From Egypt to the US and EU

The food industry in Egypt is one of the most important economic sectors. Food industries and agricultural crops exports in 2020 amounted to about \$5.720bn, which accounts for 22% of Egypt's total exports. According to the Ministry of Trade and Industry, in 2020 the food sector contributed 24.5% to total GDP. The food manufacturing sector includes a wide range of products including sugar, confectionery & chocolates, milk & dairy products, juices, drinks & water, meat, poultry & fish, oil & vegetable fats,

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<sup>4</sup> Requested access for data prior to 2020 was denied due to recent policy changes





specialty foods, yeast & food additives, and other processed food. Both the EU and US are significant markets for Egyptian food exporters. According to the Food Export Council, the EU and US represent 16% (\$587 Million) and 5% (\$205 million) of total food exports respectively<sup>5</sup>. As Figure 1 illustrates below, food exports have been stable over the last seven years, with processed foods exported at a slightly higher rate than agro-food.

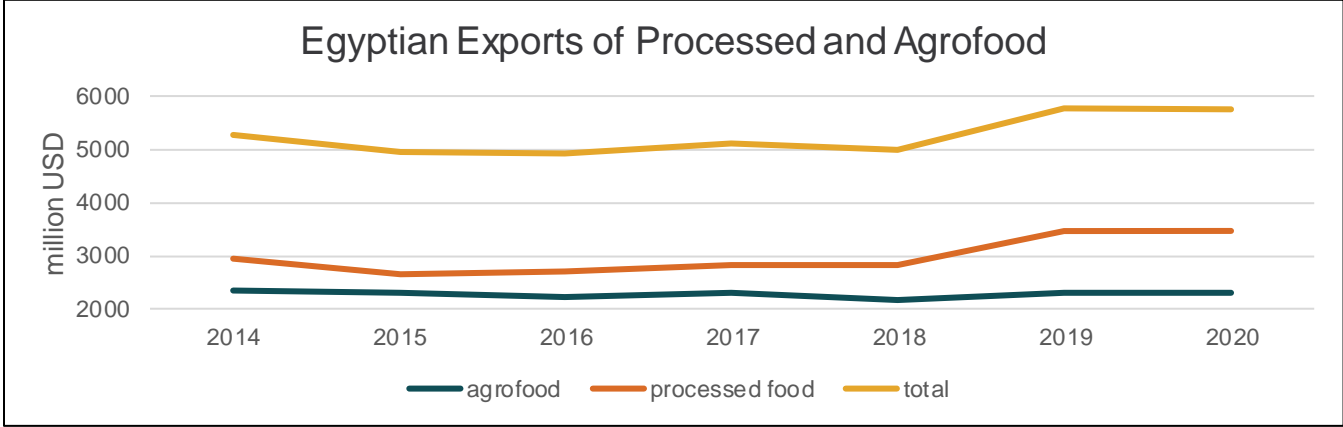


Figure 1: Egypt's exports of processed and agrofood. Source: ministry of industry, trade, and small industries and food export council

Leading food exported from Egypt to the US includes: processed crustaceans (\$30.2 million), perfume plants (\$21.7 million), frozen vegetables (\$18.3 million), other processed vegetables (\$15.6 million), and pickled foods (\$10.6 million).<sup>67</sup>

Meanwhile, as illustrated in Figure 2, Egypt mainly exports fresh products to the European Union. It is important to note that while processed food exports to the EU represent a smaller percentage than fresh, the value of processed food exports to the EU is almost equal to the total food exports to the US. A complete list of exported processed foods to the EU per country can be found in Annex 2.

Main exports from Egypt to the EU include vegetables (344 million euros) and fresh and dried fruits (215 million euros).

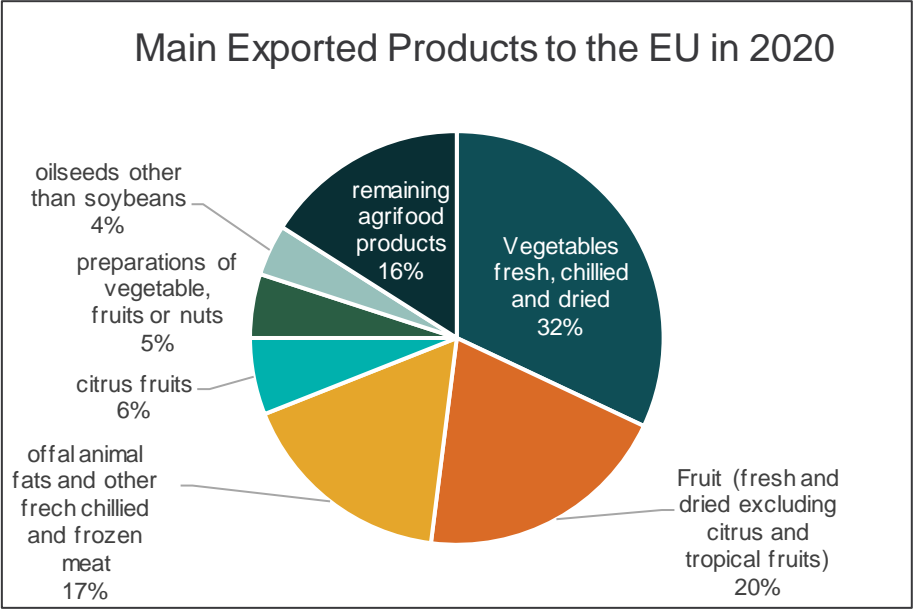


Figure 2: Main exported products to Egypt from the European Union (2020)

<sup>5</sup> <https://www.egypttoday.com/Article/3/111401/Egyptian-food-industry-exports-up-3-8-billion-in-11>

<sup>6</sup> <https://ustr.gov/countries-regions/europe-middle-east/middle-east/north-africa/egypt>

<sup>7</sup> Egyptian Exports of agro-food and processed food to USA in 2019: <https://oec.world/en/profile/bilateral-country/egy/partner/usa>



# FDA Import Refusal Analysis

## Types of Refusals

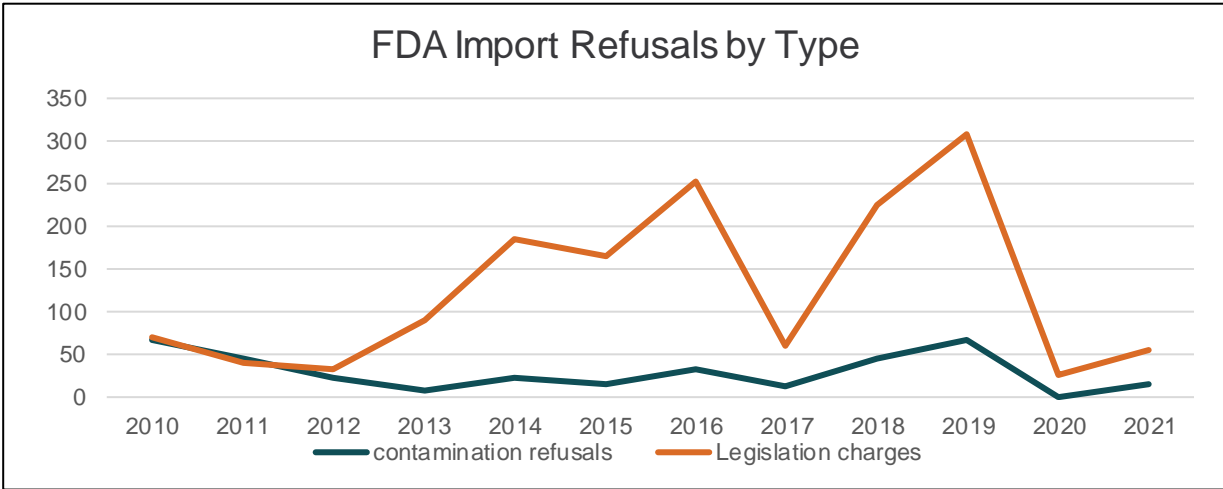


Figure 3: Import refusals from the US FDA by type

In the last 11 years (2010 to 2021), there has been a total of 1,509 legislation refusals related to misbranding/mislabeling and manufacturing conditions. There have also been 352 contamination charges related to chemical, physical and microbial contamination. Figure 3 above presents the trend of refusal charges by category.

While exact reasons will be elaborated on further in the following sections, the table below shows that import refusals do not follow a specific pattern or trend, as shown in Figure 4 below. However, in 2020 and due to the Covid-19 pandemic, both exports and refusals declined, which could be attributed to reduced inspections and trade activity.

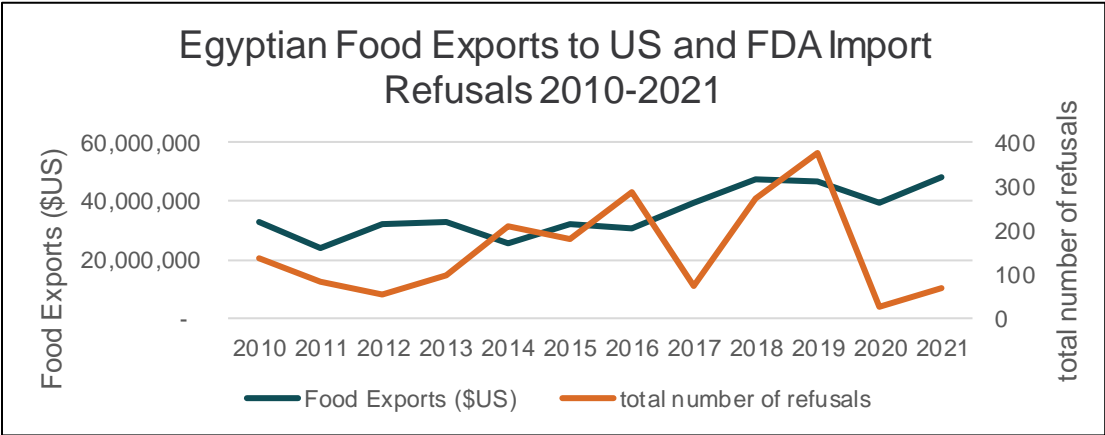


Figure 4: Egyptian exports of food to US and FDA import refusals Sources: FDA, World Bank, Export Council

Table 1 below displays total refusal charges across the years as well as the average number of refusals per subcategory and their percentages. Standard deviation was also calculated and is represented in the table below.



FDA	Number of Contamination Cases				Number of Legislation Cases			Total Number of Refusals
	Year	Chemical	Microbial	Physical	Total	Misbranding/Mislabeled	Manufacturing Conditions	
2010	31	15	21	67	56	15	71	138
2011	12	4	28	44	25	14	39	83
2012	12	3	7	22	28	4	32	54
2013	4	3	0	7	82	8	90	97
2014	12	6	5	23	160	25	185	208
2015	6	2	7	15	129	37	166	181
2016	5	10	18	33	242	10	252	285
2017	2	6	5	13	52	8	60	73
2018	10	24	11	45	201	25	226	271
2019	39	7	21	67	291	17	308	375
2020	0	0	0	0	26	0	26	26
2021	7	5	4	16	38	16	54	70
total	140	85	127	352	1330	179	1509	1861
Avg.	12	7	11	29	111	15	126	155
StDev	12	7	9	22	93	10	97	109
%	40	24	36		88	12		
% of total	8	5	7	19	71	10	81	

Table 1: Classification of refusal charges by FDA across years Source: FDA

## Products Refused

### 1. Contamination Refusals

Specific commodities can be observed to have higher frequencies of rejection due to contamination as illustrated in Figure 7 below.

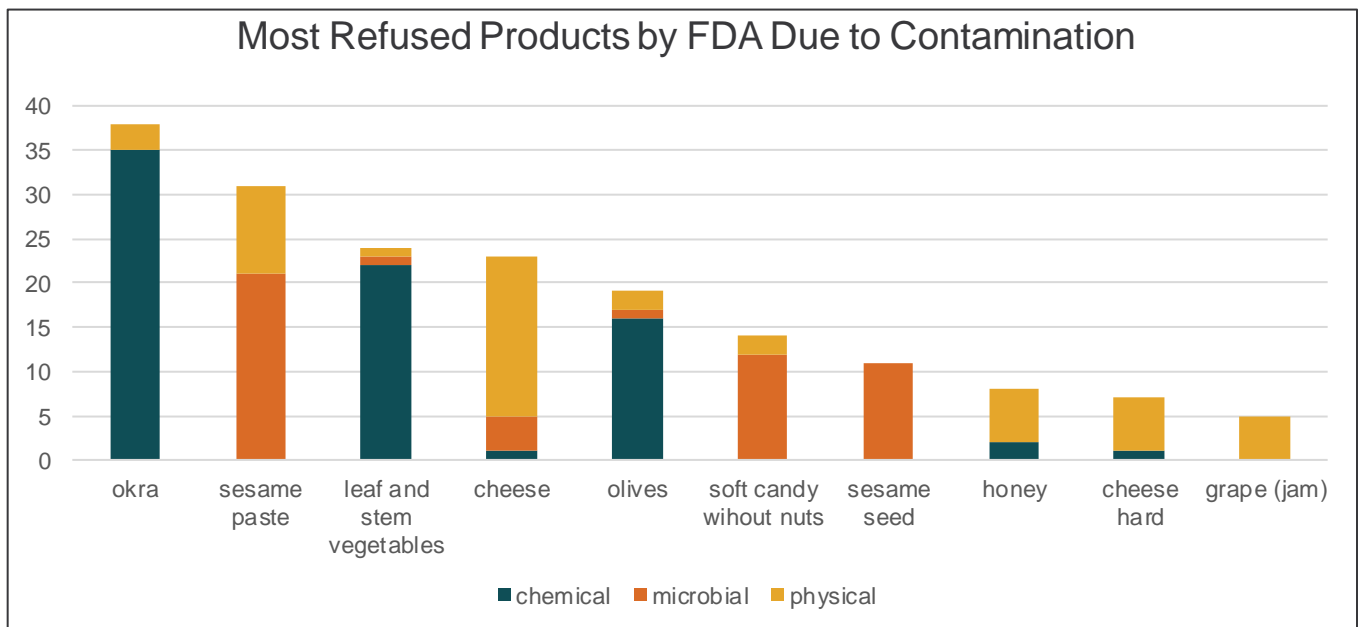


Figure 5: Main refused products by FDA (contamination charges)



The most often rejected products due to contamination charges were okra, cheese, sesame (either seeds or paste), honey, grapes, and soft candy. Okra has been refused 35 times due mainly to the existence of pesticide residues with only 3 cases of physical contamination due to the presence of color additives. Sesame paste (Tahini) has been refused 22 times due to the existence of microbial contamination (salmonella).

**2. Legislation Refusals**

Legislation charges dominate refusals for Egyptian exports to the US. Figure 6 below highlights the main products and charges for refusal due to legislation issues during the past 11 years.

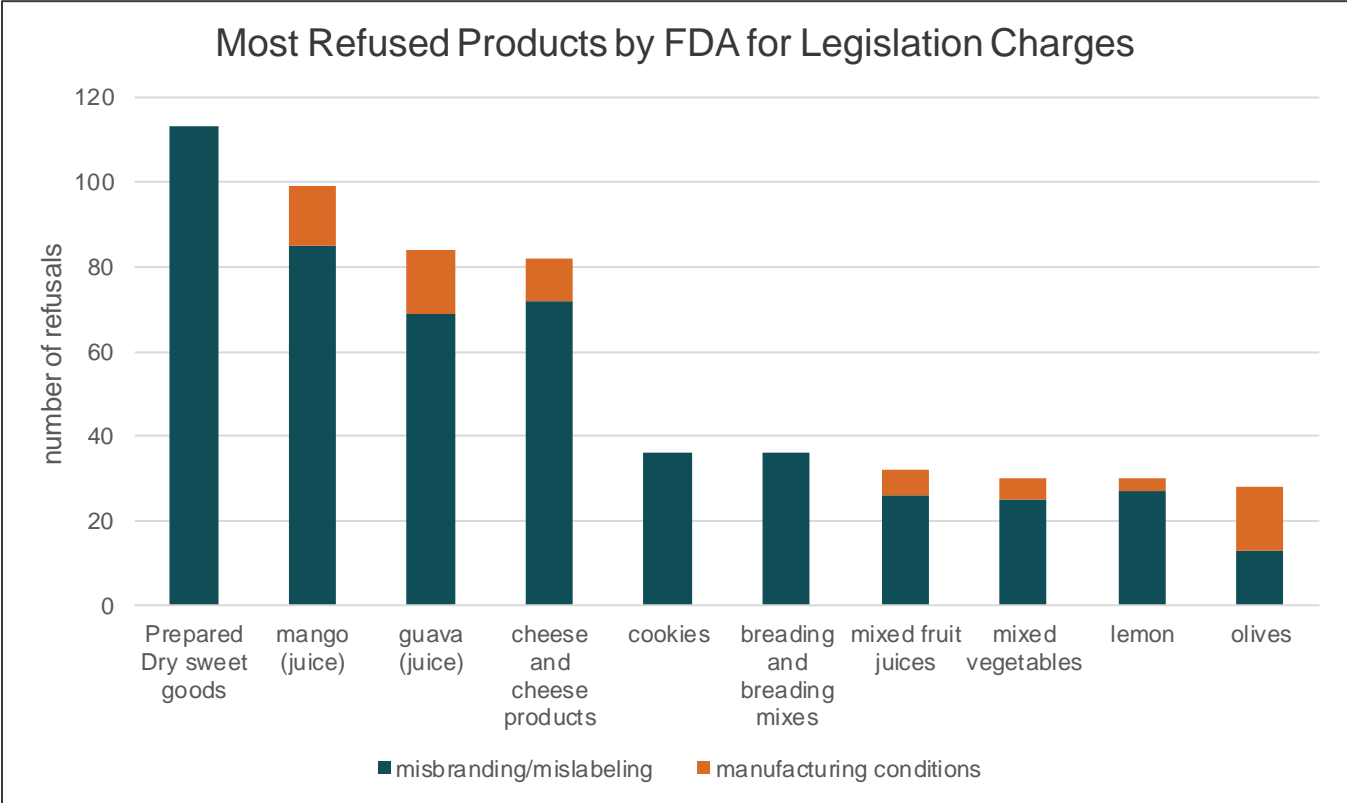


Figure 6: Main refused products by charge classification (legislation) Source: FDA

The most common reason for refusal was due to mislabeling which includes inaccurate nutrition information or ingredients lists. Meanwhile, refusal due to manufacturing conditions represents relatively few refusal cases.

**RASFF (EU) Import Refusal Analysis**

**Refusal Types**

Unlike the FDA, the RASFF portal reports strictly on contamination issues with no records for legislative refusals, and the RASFF limits access to refusal charges beyond the last two years. Therefore, to complement the analysis of prior years (2010-2019), annual reports published by EU (The Rapid Alert System for Food and Feed: Annual report) were used. However, they do not provide data on all refusals and rather report only on the most significant cases, as elaborated in Table 2 below.



In the last two years (2020 and 2021), there has been a total of 145 contamination charges, of which 71% (103 charges) were due to microbial contamination and 29% (42 charges) were a result of chemical contamination.

### Products Refused

Table 2, below, shows the selected cases presented in annual reports published by RASFF from 2010 to 2019. Data is absent for some years, which implies an insignificant number of charges and/or a minimum number of charges from different products not significantly attributed to any single product. Oranges and groundnuts are the most frequently refused imports to the EU due to the presence of pesticides and aflatoxins above the permitted maximum limit.

Year	Products	Refusal Reason	# of notifications
2010	Fresh oranges, peaches, pomegranates, strawberries, and green beans	Pesticides (multi residues)	Data not available
	Peanuts	Aflatoxin	4
	Dried basil	Dioxins	Data not available
2011	Fresh oranges, peaches, pomegranates, strawberries, and green beans	Pesticides (multi residues)	Data not available
	Peanuts	Aflatoxin	16
	Dried parsley and basil	Dioxins	2
	Fenugreek seeds	Verotoxin	Data not available
2012	Peanuts	Aflatoxin	8
	Fruits and vegetables (oranges and strawberries)	Pesticides	26
	Sunflower seeds	Aflatoxin	Data not available
2013	Frozen strawberries	Hepatitis A virus	Data not available
	Oranges, strawberries, pomegranates, and peppers	Dimethoate (in various) and methomyl (in strawberries)	32
2014	Olives, strawberries, oranges, spearmint leaves	Pesticides	Data not available
2015	Peanuts	Aflatoxin	13
2016	Groundnuts	Aflatoxin	33
2017	Groundnuts	Aflatoxin	25
2018	Groundnuts	Aflatoxin	37
2019	NA	NA	58

Table 2: RASFF annual report "selective cases" source: RASFF

When analyzing RASFF’s data for 2020 and 2021, a similar trend appears. Oranges and groundnuts are the two most frequently refused Egyptian imports to the EU due to pesticides and aflatoxins. Together, these commodities account for more than 50% of Egyptian import refusals to the EU. Both commodities were rejected at a higher rate in 2021 than 2020 most likely due to increased trade following the COVID-19 pandemic. Other commodities that are refused are: vine leaves, grape leaves, herbs and spices and various fruits and vegetables other than oranges.

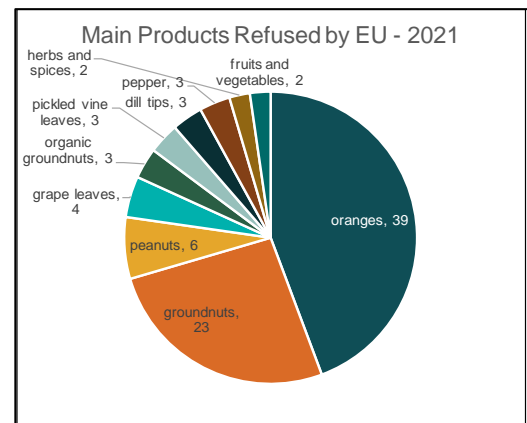


Figure 7: Main Products Refused by EU - 2021

### Findings

Based on the analysis of import refusals from the FDA and RASFF the following findings emerge:



- 1) Egyptian exporters' lack of awareness of FDA legislation requirements is a clear issue contributing to Egypt's exports refusals. In particular, the lack of awareness for US labelling requirements which constitute 88% of all refusals.
- 2) Processed foods are largely refused for either physical contamination (e.g. presence of filth or putrid) or for microbial contamination (e.g. Salmonella).
- 3) Oranges remain the most refused commodity for high levels of pesticides and chlorpyrifos.
- 4) Over the past decade, aflatoxins in groundnuts has served as a key reason for import refusals. This consistency shows a lack of exporters ability to manage their supply chains and suggests further action is needed to mitigate aflatoxin contamination.

## Recommendations

The following recommendations are made in three key areas as outlined below:

- 1) Increase exporters' awareness of the legislative requirements to access the US market through:**
  - a. Offering consultancies to new exporters targeting US markets to ensure compliance with legislation requirements before production and exporting.
  - b. Create an easy toolkit for legislative export requirements to guide exporters with labelling and branding their products ahead of exportation. This could be in the form of guidelines and disseminated in designated information sessions.
  - c. Link exporters of the Food Export Council to firms in the United States that offer label reviews.
- 2) Support exporting facilities to enhance manufacturing conditions and hygienic practices to reduce incidents of microbial and physical contamination through:**
  - d. Ensuring that the National Food Safety Authority regulates exporting facilities to ensure hygienic manufacturing conditions and thus reduce the risks of microbial and physical contamination.
  - e. Utilizing a risk-based approach to target inspections for higher-risk and more strategic commodities. New exporters are those with a history of refused exports can be regulated more closely.
  - f. Providing trainings and workshops on pre-requisite programs such as hygiene, sanitation, or HACCP requirements and preventive controls to food exporters.
- 3) Strengthen the food safety control and quality infrastructure system to support exporters of fresh and frozen food to reduce incidents of contamination through:**
  - g. Improving access and reliability of laboratory tests to encourage exporters to test high risk products for chemical contamination with special support for oranges.
  - h. Working with and strengthening contracted farmers (suppliers) to utilize appropriate quantities of pesticides and to test their produce for contamination.
  - i. Working with contracted farmers to not plant on contaminated lands/plots to reduce the potential for contamination.



#### **4) Support exporter's awareness of aflatoxin control through:**

- j. Developing a traceability system to identify suppliers of refused exports due to aflatoxin and mark them as high risk.
- k. Create a map of areas with high aflatoxin contamination and support exporters to make sourcing improvements.
- l. Support the quality infrastructure system to provide reliable, affordable and timely aflatoxin tests for suppliers and exporters.
- m. Work with exporters to promote good agricultural practices to their suppliers and contracted farmers.

#### **6) Promote continued awareness through:**

- n. Creating a portal of shared information and guidelines. This portal should also provide regular analyses on import refusal charges and common challenges by exporters, propose solutions to identified common challenges faced by exporters, and provide updated statistics of rejection cases.

## **Conclusion**

Egypt's food sector is an important element of Egypt's economy and represents an attractive investment opportunity. Despite growing food exports, Egypt is suffering financial losses due to refused imports from valuable and large markets such as the US and the EU. This report analyzed the key reasons for these refusals and presented implementation and policy recommendations to reduce the number of refused imports. With the main source of rejections coming from mislabeling, Egyptian exporters can quickly address this constraint through training, increased awareness and business linkages with US companies. Meanwhile, the establishment of the National Food Safety Authority presents an opportunity for improved oversight of food exporters to minimize chemical and microbial contamination. Supporting activities to reduce the number of Egyptian food exports being refused will increase the earnings of Egyptian companies and generate a high return on investment.



# Annex 1: Refusal charges by type, definition, and classification per region

FDA
Legislation Charges <i>(Duplication refers to the frequency of the charge)</i>
Misbranding/Mislabeling
The article appears to be misbranded in that the label or labeling fails to bear the required nutrition information.
The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to be misbranded in that the label or labeling fails to bear the required nutrition information.
The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&C Act in that it appears to be misbranded within the meaning of Section 403(e)(2) of the FD&C Act in that the food is in package form and the label fails to bear an accurate statement of the quantity of the contents in terms of weight, measure, or numerical count in accordance with Section 403(e)(2) of the FD&C Act.
The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&C Act in that it appears to be misbranded within the meaning of Section 403(f) of the FD&C Act in that any word, statement, or other information required by or under the authority of the FD&C Act to appear on the label or labeling is not prominently placed thereon with such conspicuousness (as compared with other words, statements, designs, or devices, in the labeling) and in such terms as to render it likely to be read and understood by the ordinary individual under customary terms of purchase and use (for example, label contains information in two or more languages but fails to repeat all required information in both languages in accordance with 21 CFR 101.15(c)(2), or label fails to include all required information in English in accordance with 21 CFR 101.15(c)(1), except in the case of articles distributed solely in the Commonwealth of Puerto Rico or in a Territory where the predominant language is one other than English).
The article appears in violation of FPLA because of its placement, form and/or contents statement.
The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&C Act in that it appears to be misbranded within the meaning of Section 403(e)(1) of the FD&C Act in that the food is in package form and the label fails to bear the name and place of business of the manufacturer, packer, or distributor.
The article is subject to a refusal of admission pursuant to Section 801(a)(3) of the FD&C Act in that it appears to be misbranded within the meaning of Section 403(i)(2) of the FD&C Act in that it is fabricated from two or more ingredients and the label fails to bear the common or usual name of each such ingredient and/or the article purports to be a beverage containing vegetable or fruit juice, but does not bear a statement with appropriate prominence on the information panel of the total percentage of such fruit or vegetable juice contained in the food.
The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&C Act in that it appears to be misbranded within the meaning of Section 403(i)(1) of the FD&C Act in that the label fails to bear the common or usual name of the food, if any there be.
The label fails to declare all major food allergens present in the product, as required by section 403(w)(1).
The product is misbranded under Section 403(q) because the nutrition label does not provide all of the information required by 21 CFR 101.9(c); specifically, the label does not bear the amount of trans fat [21 CFR 101.9(c)(2)(ii)].





<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&amp;C Act in that it appears to be misbranded within the meaning of Section 403(a)(1) of the FD&amp;C Act in that the labeling is false or misleading in any particular.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&amp;C Act in that it appears to be misbranded within the meaning of Section 403(e)(1) of the FD&amp;C Act in that the food is in package form and the label fails to bear the name and place of business of the manufacturer, packer, or distributor [Misbranded, Section 403 (e)(1)].</p>
<p>The food appears to bear or contain the color additive FD &amp; C Yellow No. 5, which is not declared on the label per 21 CFR 74.705(a)(c) under section 721.</p>
<p>It appears the drug or device is not included in a list required by Section 510(j), or a notice or other information respecting it was not provided as required by section 510(j) or 510(k).</p>
<p>The article is in package form and appears to not bear a label containing the name and place of business of the manufacturer, packer, or distributor.</p>
<p>The article appears to contain a chemical preservative and it fails to bear labeling stating that fact including its function.</p>
<p>The article appears to contain an artificial coloring and it fails to bear labeling stating that fact.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&amp;C Act in that it appears to be misbranded within the meaning of Section 403(h)(1) of the FD&amp;C Act in that the article purports to be or is represented as a food for which a standard of quality has been prescribed by regulation as provided by Section 401 of the FD&amp;C Act, and its quality falls below such standard and its label does not bear a statement that it falls below such standard in such manner and form as such regulations specify.</p>
<p>It appears the food is a beverage containing vegetable or fruit juice and does not bear a statement on the label in appropriate prominence on the information panel of the total percentage of such fruit or vegetable juice contained therein.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&amp;C Act in that it appears to be misbranded within the meaning of Section 403(i)(2) of the FD&amp;C Act in that the food purports to be a beverage containing vegetable or fruit juice and does not bear a statement on the label in appropriate prominence on the information panel of the total percentage of such fruit or vegetable juice contained therein.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&amp;C Act in that it appears to be misbranded within the meaning of Section 403(g)(1) of the FD&amp;C Act in that the article purports to be or is represented as a food for which a definition and standard of identity have been prescribed by regulations as provided by section 401 of the FD&amp;C Act and the article does not conform to such definition and standard.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to contain an artificial flavoring and it fails to bear labeling stating that fact.</p>
<p>The article is in package form and appears to not have a label containing an accurate statement of the quantity of the contents in terms of weight, measure or numerical count and no variations or exemptions have been prescribed by regs.</p>
<p>The article is subject to refusal of admission pursuant to section 801(a)(3) in that it appears to be misbranded because 1) it appears to contain sulfites but the label fails to declare the presence of sulfites, a fact material to sulfite-sensitive individuals who must avoid the ingredient due to potential health consequences from its consumption, and 2) it appears the food is fabricated from two or more ingredients and the label does not list the common or usual name of each ingredient.</p>

## Manufacturing conditions



<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) in that the manufacturer's failure to file a scheduled process demonstrates that the product is not being manufactured under the mandatory provisions of 21 CFR Part 108 and therefore appears to have been manufactured, processed, or packed, under insanitary conditions whereby it may have been rendered injurious to health.</p>
<p>It appears the manufacturer is not registered as a low acid canned food or acidified food manufacturer pursuant to 21 CFR 108.25(c)(1) or 108.35(c)(1).</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) in that the manufacturer's failure to file a scheduled process demonstrates that the product is not being manufactured under the mandatory provisions of 21 CFR Part 108 and therefore appears to have been manufactured, processed, or packed, under insanitary conditions whereby it may have been rendered injurious to health.</p>
<p>The article appears to be, or to bear or contain a color additive which is unsafe within the meaning of Section 721(a).</p>
<p>The article appears to have inadequate processing in having been prepared, packed, or held under insanitary conditions whereby it may have been rendered injurious to health.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to have been prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth, or whereby it may have been rendered injurious to health.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the Federal Food, Drug, and Cosmetic Act (the Act) in that such article appears to have been prepared, packed, or held under insanitary conditions whereby it may have been rendered injurious to health.</p>
<p>The article is subject to refusal of admission pursuant to section 801(a)(1) in that the article appears to have been manufactured, processed, or packed under insanitary conditions.</p>
<p>The article appears to be held in swollen containers or contains micro leaks.</p>
<p>The article is subject to refusal of admission pursuant to section 801 (a)(1) in that it appears to have been manufactured or processed under insanitary conditions which may result in unpasteurized or inadequately pasteurized product.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to have been prepared, packed, or held under insanitary conditions, or it may be injurious to health, due to failure of the foreign processor to comply with 21 CFR 120.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) of the FD&amp;C Act in that it appears to be misbranded within the meaning of Section 403(g)(1) of the FD&amp;C Act in that the article purports to be or is represented as a food for which a definition and standard of identity have been prescribed by regulations as provided by section 401 of the FD&amp;C Act and the article does not conform to such definition and standard.</p>
<p>The article is subject to refusal of admission pursuant to Section 801(a)(3) in that the manufacturer's failure to file a scheduled process demonstrates that the product is not being manufactured under the mandatory provisions of 21 CFR Part 108 and therefore appears to have been manufactured, processed, or packed, under insanitary conditions whereby it may have been rendered injurious to health.</p>
<p>aubergines stuffed with walnuts and preserved in oil with defective packaging (leaky cans) from Egypt, via Sweden</p>



# Contamination Charges

## Chemical

The article is subject to refusal of admission pursuant to section 801(a)(3) in that it appears to be adulterated because it contains a pesticide chemical, which is in violation of section 402(a)(2)(B).

The article is subject to refusal of admission pursuant to section 801(a)(3) in that it appears to be adulterated because it contains a pesticide chemical, which is in violation of section 402(a)(2)(B).

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to bear or contain a pesticide chemical residue, which causes the article to be adulterated within the meaning of section 402(a)(2)(B) of the FD&C Act.

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to contain a new animal drug (or conversion product thereof) that is unsafe within the meaning of Section 512.

The article appears to contain a chemical preservative and it fails to bear labeling stating that fact including its function.

The article is subject to refusal of admission pursuant to Section 801(a)(3), in that the article appears to contain Listeria monocytogenes, a poisonous and deleterious substance, which may render it injurious to health.

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to contain a chemical preservative and it fails to bear labeling stating that fact including its function.

## Microbial

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to contain Salmonella, a poisonous and deleterious substance which may render it injurious to health.

The article is subject to refusal of admission pursuant Section 801(a)(3) in that it appears to contain Salmonella, a poisonous and deleterious substance which may render it injurious to health.  
[Adulteration, Section 402(a)(1)]

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to bear or contain a poisonous or deleterious substance which may render the article injurious to health.

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to bear or contain an unsafe food additive within the meaning of section 409.

The article appears to contain a poisonous and deleterious substance which may render it injurious to health.

## Physical

The article appears to consist in whole or in part of a filthy, putrid, or decomposed substance or be otherwise unfit for food.

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that the article appears to consist in whole or in part of a filthy, putrid, or decomposed substance or be otherwise unfit for food.

The article appears to be a device whose quality falls below that which it purports or is represented to possess, in that instrument is represented as stainless steel but does not meet requirements for such steel for surgical instruments.

The article appears to be, or to bear or contain a color additive which is unsafe within the meaning of Section 721(a).

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to bear or contain an unsafe food additive within the meaning of section 409.

The article is subject to refusal of admission pursuant to section 801(a)(3) in that it appears to be unfit



for food.

The article is subject to refusal of admission pursuant to section 801(a)(3) in that it appears to bear or contain a food additive, namely melamine and/or a melamine analog, that is unsafe within the meaning of section 409.

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to bear or contain a poisonous or deleterious substance which may render the article injurious to health.

The article is subject to refusal of admission pursuant to Section 801(a)(3) in that it appears to contain a poisonous or deleterious substance, lead, which may render it injurious to health.

## RASFF

### Contamination Charges *(Duplication refers to the frequency of the charge)*

#### Chemical

Exceeding the MRL for dimethoate in mandarins

Aflatoxin in Egyptian groundnuts

Unauthorized pesticide Chlorpyrifos and increased levels of pesticide Malathion in dried and ground spearmint from Egypt, via Greece

Aflatoxin in Egypt groundnuts

Unauthorized substance chlorpyrifos in dried dill tips from Egypt, via the Netherlands

Chlorpyrifos in oranges from Egypt

Dimethoat and chlorpyrifos in Oranges from Egypt

unauthorised substance chlorpyrifos in oranges from Egypt

Chlorpyrifos and chlorpyrifos-methyl in herbs and spices

perchlorate in organic marjoram from Egypt

aflatoxin in groundnuts

chlorpyrifos 0.062 ppm mrl 0.01 ppm

chlorpyriphos-ethyl in oranges

Pesticide residues in grape leaves in brine from Egypt

Aflatoxins in Organic Egyptian peanuts for Further Processing

aflatoxin in groundnuts from Egypt

Aflatoxins in Egyptian peanuts

Carbendazim, chlorpyrifos, fenbuconazole, paclobutrazole, penconazole and propiconazole in dill tips from Egypt

Chlorpyrifos in peppermint rubbed from Egypt

Chlorpyrifos in frozen strawberries from Egypt via Germany

Exceedance of maximum levels of pesticide residues in grape leaves in brine from Egypt

Aflatoxins in organic groundnut kernels from Egypt

Penconazole, propiconazole, thiophanate-methyl, cyproconazole and myclobutanil and unauthorised substances carbendazim, flusilazole and iprodione in pickled vine leaves from Egypt, via the Netherlands

Chlorpyrifos-ethyl in orange from Egypt

Chlorpropham in oranges from Egypt



Unauthorised substances chlorpyrifos in sliced black olives from Egypt
Pesticide residues in pickled vine leaves from Egypt
Chlorpyrifos-ethyl in oranges from Egypt
Chlorpyrifos and Imazalil in oranges from Egypt
Chlorpyrifos on oranges
Aflatoxin B1 in groundnuts from Egypt
Chlorpyrifos in grape leaves from Egypt
Carbendazim in dates
Chlorpyrifos in fresh oranges from Egypt
Chlorpyrifos - ethyl in oranges from Egypt
Unauthorized substance Chlorothalonil in peppers (Capsicum Annum) from Egypt
Unauthorized substance Cyfluthrin in pomegranates from Egypt
Chlorpyrifos in dill tips from Egypt
Aflatoxins (B1 =5,6 +/- 0.5; Tot. = 5,8 µg/kg - ppb) in shelled peanuts intended for human consumption from Egypt
Aflatoxins in groundnuts from Egypt
Unauthorised substance chlorpyrifos (0.047 mg/kg - ppm) in peppermint from Egypt
Aflatoxins in peanuts from Egypt
Lambda-cyhalothrin and chlorpyrifos in fresh chilies from Egypt.
Chlorpyrifos-ethyl and dimethoate in oranges from Egypt
Chlorpyrifos-ethyl in oranges from Egypt
Aflatoxins in peanuts in shell from Egypt
Dimethoate in guavas from Egypt
Unauthorised pesticide residue Chlorpyrifos in oranges from Egypt
Aflatoxin B1 in sunflower seeds for bird
Residue of pesticide Fosthiazate in baby potatoes
CHEDD.ES.2021.0029606R
Chlorpyrifos-ethyl 0.04 ppm in oranges from Egypt
Pesticide residue of Chlorpyrifos in fresh orange from Egypt
Aflatoxins in Egyptian organic groundnuts
Unauthorised pesticide residue chlorpyrifos in oranges from Egypt
Unauthorized substance chlorpyrifos in pomegranates from Egypt
Dimethoate in oranges from Egypt
Chlorpyrifos in dill tips rubbed from Egypt, via Germany
Shelled peanuts from Egypt
Aflatoxins in Shelled peanuts
Pesticide Residues
pesticide residues on pepper
Aflatoxins in groundnuts from Egypt



Unauthorised pesticide residue dimethoate in oranges from Egypt
Undeclared sullphites and unauthorized use of benzoic acid in fig jam from Egypt
Chlorpyrifos in oranges
Aflatoxins in blanched organic groundnut kernels from Egypt
Pesticide residues in vine leaves from Egypt
Pesticides residues in vine leaves from Egypt
Sulphur dioxide in pickled artichokes from Egypt
Mercury in groupers from Egypt
Unauthorized addition of benzoic acid (E210) in strawberry jam from Egypt
Exceedance of MRLs for vine leaves from Egypt via Denmark
Exceedance of maximum residue levels in vine leaves from Egypt
Pesticide residue chlorpyriphos in dates from Egypt
Chlorpyrifos in red grapes from Egypt
Pyrrrolizidine alkaloids in anise seeds from Egypt
Pesticide residues in grape leaves from Egypt
Pesticide residues in grape leaves from Egypt
Aflatoxin in Peanuts
Imazalil in oranges from Egypt
MRL carbofuran Spring Onions
Aflatoxins in shelled groundnuts from Egypt
Pesticides in beans from Egypt
Aflatoxine in organic groundnut kernels
Aflatoxin in Peanuts from Egypt
Pesticides in pickled vine leaves from Egypt
<b>Microbial</b>
Salmonella spp. in spearmint leaves rubbed from Egypt
Salmonella spp. in basil from Egypt
Salmonella (in 1 out of 5 samples /25g) in Sesame Paste (Tahini) from Egypt
Salmonella in dried basil from Egypt
Salmonella spp. in basil



## Annex 2: Egyptian exports of processed food to EU countries in 2019 source: OEC

Country	Exports Value (dollars)
Italy	41,100,000
Spain	37,500,000
Germany	16,400,000
Netherlands	14,000,000
Greece	9,340,000
Portugal	8,380,000
Romania	8,170,000
Belgium	7,880,000
France	7,580,000
Sweden	6,560,000
Cyprus	5,220,000
Czech	3,160,000
Slovakia	2,530,000
Poland	2,400,000
Ireland	1,370,000
Lithuania	1,100,000
Slovenia	737,000
Hungary	644,000
Malta	435,000
Bulgaria	330,000
Croatia	313,000
Finland	161,000
Denmark	93,600
Estonia	65,600
Austria	52,200
Luxembourg	15,500
Latvia	234
<b>Total</b>	<b>175,537,134</b>



## References

### RASFF's annual reports:

- The Rapid Alert System for Food and Feed. (2020). *The Rapid Alert System for Food and Feed – Annual Report 2020*.  
[https://ec.europa.eu/food/system/files/2021-08/rasff\\_pub\\_annual-report\\_2020.pdf](https://ec.europa.eu/food/system/files/2021-08/rasff_pub_annual-report_2020.pdf)
- The Rapid Alert System for Food and Feed. (2019). *The Rapid Alert System for Food and Feed - annual report 2019*.  
<https://op.europa.eu/en/publication-detail/-/publication/2c5c7729-0c31-11e9-bc07-01aa75ed71a1/language-en/format-PDF/source-174742448>
- The Rapid Alert System for Food and Feed. (2018). *The Rapid Alert System for Food and Feed – Annual Report 2018*.  
<https://op.europa.eu/en/publication-detail/-/publication/c3318331-d9c4-11e9-9c4e-01aa75ed71a1/language-en/format-PDF/source-search>
- The Rapid Alert System for Food and Feed. (2017). *The Rapid Alert System for Food and Feed – Annual Report 2017*.  
<https://op.europa.eu/en/publication-detail/-/publication/f4adf22f-4f7c-11e9-a8ed-01aa75ed71a1/language-en/format-PDF/source-search>
- The Rapid Alert System for Food and Feed. (2016). *The Rapid Alert System for Food and Feed – Annual Report 2016*.  
<https://op.europa.eu/en/publication-detail/-/publication/7ced87a2-ce70-11e7-a5d5-01aa75ed71a1/language-en/format-PDF/source-search>
- The Rapid Alert System for Food and Feed. (2015). *The Rapid Alert System for Food and Feed – Annual Report 2015*.  
<https://op.europa.eu/en/publication-detail/-/publication/98e04cfc-aa54-11e6-aab7-01aa75ed71a1/language-en/format-PDF/source-244146732>
- The Rapid Alert System for Food and Feed. (2014). *The Rapid Alert System for Food and Feed – Annual Report 2014*.  
<https://op.europa.eu/en/publication-detail/-/publication/a2cda8f4-cd64-4604-ab3b-5f8a5f698d50/language-en/format-PDF/source-search>
- The Rapid Alert System for Food and Feed. (2013). *The Rapid Alert System for Food and Feed – Annual Report 2013*.  
<https://op.europa.eu/en/publication-detail/-/publication/ec2521ba-73d4-412f-94fd-6398c730640d/language-en/format-PDF/source-174743070>
- The Rapid Alert System for Food and Feed. (2012). *The Rapid Alert System for Food and Feed – Annual Report 2012*.  
<https://op.europa.eu/en/publication-detail/-/publication/61360886-b553-4ce1-92f6-09326ee504d6/language-en/format-PDF/source-244146776>
- The Rapid Alert System for Food and Feed. (2011). *The Rapid Alert System for Food and Feed – Annual Report 2011*.  
<https://op.europa.eu/en/publication-detail/-/publication/79564291-a792-4c3b-aeb8-53455d22c9a8/language-en/format-PDF/source-search>
- The Rapid Alert System for Food and Feed. (2010). *The Rapid Alert System for Food and Feed – Annual Report 2010*.  
<https://op.europa.eu/en/publication-detail/-/publication/7de58882-f5c5-4e28-b8b5-0ebf9836dbdf/language-en/format-PDF/source-244146914>

### Egypt's exports to EU (2016-2020)

- European Commission. (2021). *AGRI-FOOD TRADE STATISTICAL FACTSHEET*.  
[https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/agrifood-egypt\\_en.pdf](https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/farming/documents/agrifood-egypt_en.pdf)