

EU Regulations & AGRINFO:
improving information exchange

Cairo, 10 November 2026

Egypt-EU Private Sector Agrifood Dialogue Series – Farm to Fork

Funded by the European Union

"EU VISION FOR THE FUTURE OF AGRICULTURE"

1. **Foster a competitive and resilient sector**
   - ***Agri-food chain under pressure: climate change, global competition, higher energy prices****.... Food security and sovereignty are a priority in Europe*
2. **Develop resistance to geopolitical changes:**
   - Diversify trade relations, create new export opportunities, pursue international partnerships
3. **Ensure products all have the same standards:**
   - Ensure EU's ambitious standards do not give it a competitive disadvantage. ***Fully enforce food safety as non-negotiable priority***
4. **Increase resilience of the (EU) agri-food sector:**
   - Innovate and maintain leadership in global markets, ***protect the interests of European farmers***, and reduce critical import dependencies

“EU VISION FOR THE FUTURE OF AGRICULTURE”

Framing the relationship between food produced in Europe and food imports:

- **Global consensus on farming and food standards** : EU aims to raise global standards & encourage a common understanding of sustainable food production
- **Bilateral dialogue**: EU will use trade negotiations and policy dialogues to reinforce agreements on sustainability and sustainable development
- **Aligning food imports with EU production standards**: responding to concerns that the EU food sector is at a disadvantage due to more stringent EU rules (in particular pesticides & animal welfare)
- **Strengthening import controls**

WHAT DOES THIS MEAN FOR EGYPT?

Evolving legislation with potential implications for exports:

- ***New rules aligned with the EU Vision:***
  - Plant health, fisheries & aquaculture, …
- ***Stricter rules:***
  - Pesticides & contaminants, packaging, …
- ***Demands for more information:***
  - Due diligence, forced labour…

SUSTAINABILITY AGENDA UNDER REVIEW

2019 – Green Deal

2024 – 'backlash' against "green" policies

<u>International Agenda</u>

- Climate neutral by 2050
- Reducing emissions by at least 55% by 2030
- Move to a clean, circular economy; restore biodiversity

- Cost of living (impact of carbon taxes/energy surcharges on poorest)
- Cost to farmers of strict environmental rules
- Loss of EU competitiveness

- Farmers street protests
- Political shift in EU countries

EU Omnibus Simplification Package:

Legislative initiative to "streamline complex European regulations, cut administrative burdens, and boost economic competitiveness without abandoning core green and industrial goals"



SOME ONGOING & UPCOMING CHANGES

Demands for more information

DUE DILIGENCE

Information on how items are produced, and impact on people & environment

Regulation 2024/3015 Forced Labour

Aim: prohibit supply of products made with forced labour on the EU market

Corporate Sustainability Due Diligence Directive (CS3D)

Aim: Reduce risk of negative impacts on human rights and environmental obligations

Corporate Sustainability Reporting Directive (CSRD)

Aim: Let shareholders & public see through reporting what companies are doing around sustainability

Applicable from 14 December 2027

Responsibility for large companies (mainly EU). No direct impact on exporters, but increased information requirements from EU buyers for information along value chain.
Simplification - limits obligations to only the largest companies & restricts information from smaller suppliers



SOME ONGOING & UPCOMING CHANGES

New rules aligned with the EU vision

EU VISION FOR FISHERIES & AQUACULTURE

- **Increase EU production –** Wild (including EU fleets in non-EU waters) & aquaculture.
- **Secure EU imports**
  - New sustainable fisheries partnership agreements to tackle overfishing, unfair competition, zero tolerance of illegal fishing
- **Stricter rules in line with EU values**
  - Also covering imported fish (including animal welfare)
- **Enabling consumers to make informed choices**
  - Extending mandatory labelling indicating origins

EU PLANT HEALTH RULES

- **Regulation 2016/2031** specifies basic rules for imports of plants and plant products
  - phytosanitary certificate required - certified free from Union quarantine pests, compliant with the Regulation
  - minimum identity and physical checks at import (1%) - OCR
- **Regulation 2019/2072** specifies additional measures applied to certain plants, plant products and other objects to allow their import into the EU
  - ***Annex VI*** - Prohibited from being introduced into the EU from specified countries (or zones)
  - ***Annex VII*** - Special import requirements including options for compliance, Additional Declarations

ANNEX VII – SPECIAL REQUIREMENTS FOR CITRUS

- Citrus is an economically important crop in several EU Member States so tolerance of pest risk is very low
- Climate change is influencing pest distribution
- Increasingly stringent rules: NPPO must provide detailed information on several critical pests & diseases and conform with designated options
  - citrus canker (*Xanthomonas citri pv. aurantifolii* and X. *citri pv. citri*)
  - citrus fruit and leaf spot (*Pseudocercospora angolensis*)
  - citrus black spot (*Phyllosticta citricarpa*)
  - non-European *Tephritidae* (fruit fly)
  - false codling moth (*Thaumatotibia leucotreta*)



ONGOING & UPCOMING CHANGES

Stricter rules

EU PROPOSES NEW APPROACH TO PESTICIDE MAXIMUM RESIDUE LIMITS (MRLs)

EU OBJECTIVE: To align requirements for imported products with those applying to EU production

- Currently, a pesticide might not be approved for use in the EU **but** it can still have an EU MRL that allows it to be used on products imported from other countries (**Import Tolerance)**
- **This option is under discussion and may change**
- EU proposal is for Import Tolerance MRLs to be lowered to 0.01mg/kg (LOQ) for the most hazardous pesticides (in most cases, they could no longer be used on crops for export to EU)

IMPACT ON EGYPT?

COLEAD indicative* assessment of pesticides authorised in Egypt** that may be targeted for reducing MRLs to 0.01mg/kg.

*no formal list is currently available

** based on registrations by Egyptian Agricultural Pesticide Committee (http://www1.apc.gov.eg/en/search.aspx)

Pesticides possibly considered as highly hazardous or having unacceptable risks to bee health & groundwater

Insecticides

- Acetamiprid
- Bifenthrin
- Clofentezine
- Deltamethrin
- Fenthion
- Imidacloprid
- Spirodiclofen
- Spirotetramat
- Thiacloprid

Fungicides/post-harvest treatments

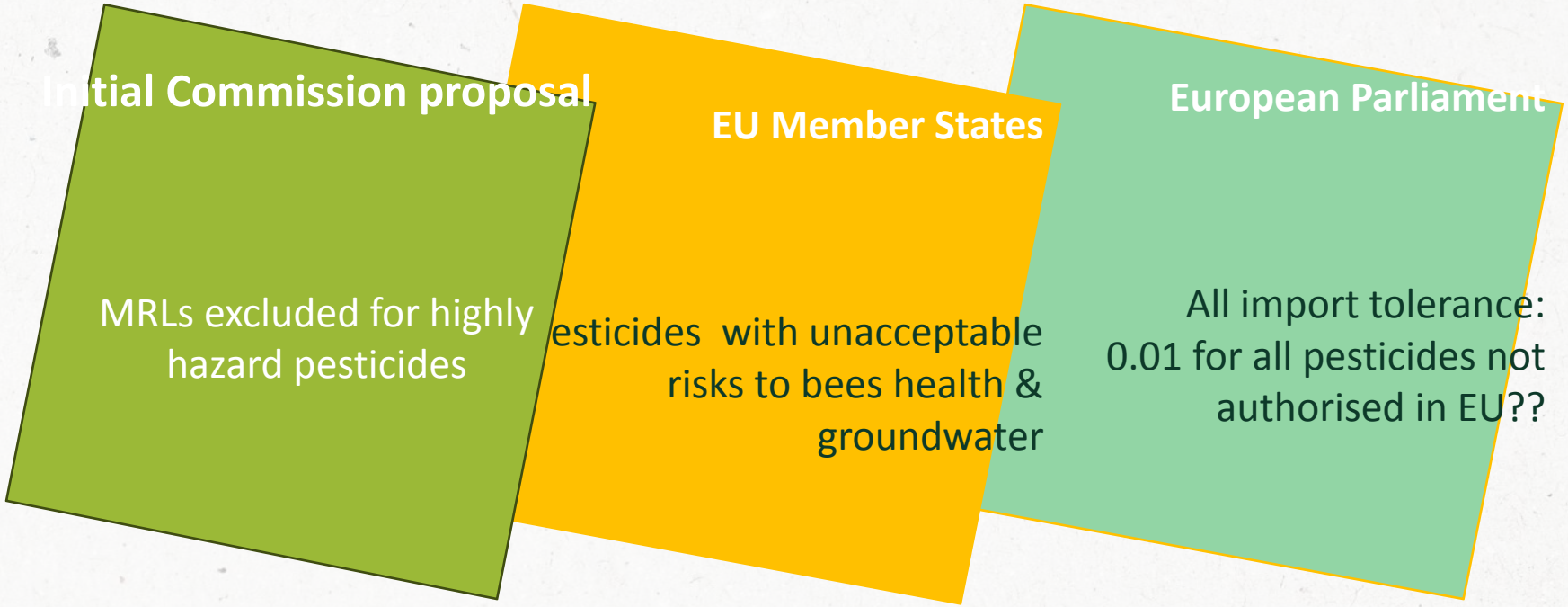
- Benthiavalicarb
- Cyproconazole
- Difenoconazole
- Dimethomorph
- Fluazinam
- Fludioxonil
- Iprodione
- Mancozeb
- Metiram
- Myclobutanil
- Penconazole
- Propiconazole
- Tebuconazole
- Tetraconazole
- Triadimenol

Herbicides

- Flufenacet
- Glufosinate
- Metribuzin

IMPACT ON IMPORT TOLERANCES?

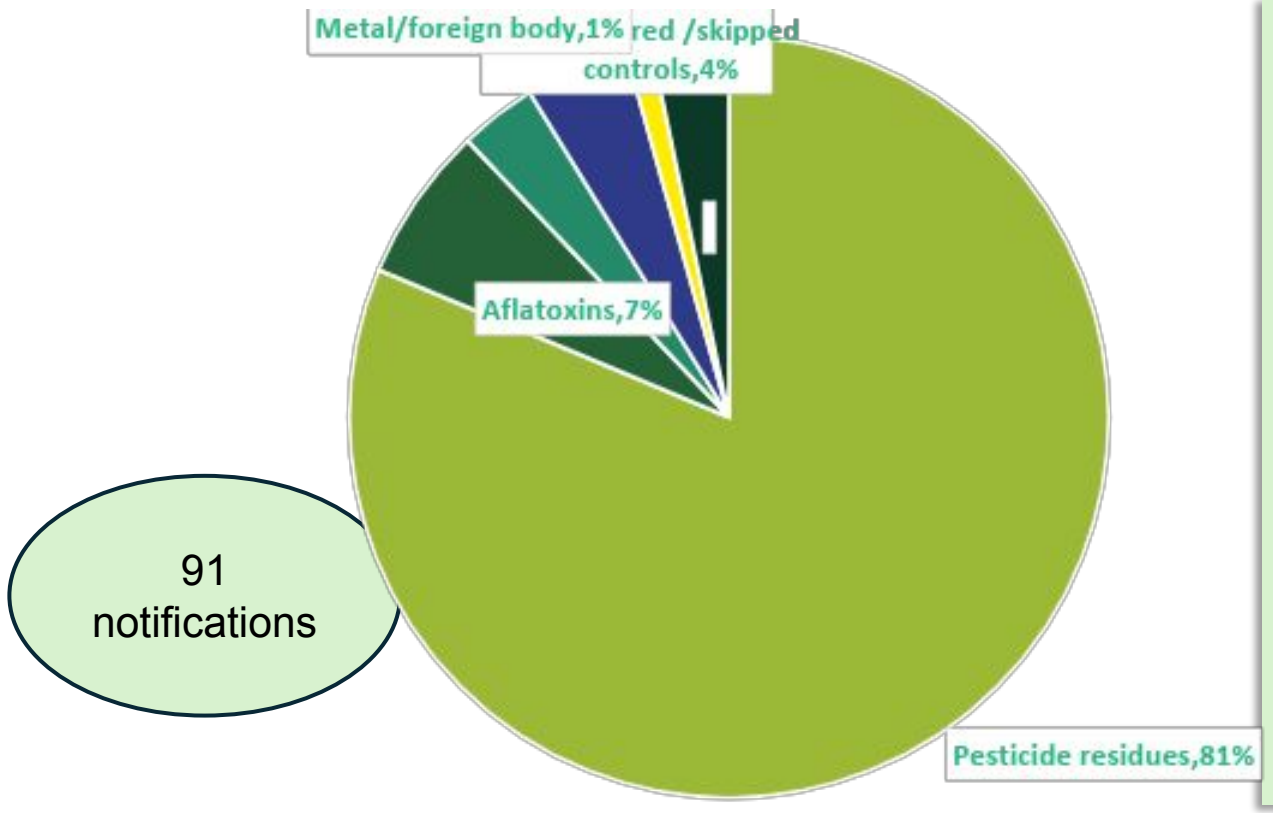
Final scope not yet known… still under discussion. Political agreement must be reached between the 3 institutions



Advisable for export sectors to consider potential impact and contingencies

EGYPT: RASSF NOTIFICATIONS & INCREASED CONTROLS

All consignments found by EU authorities not compliant with EU law are notified to the European Commission. Food safety risks are reported via the Rapid Alert System for Food and Feed (RASSF).



Egypt RASFF notifications January-August 2026

Multiple RASSF notifications can lead to increased controls at the EU border

Current controls (Regulation 2019/1973) for Egypt:

- Annex I: peppers (30% of consignments checked); oranges, sugar apple and vine leaves (20%)
- Annex II: groundnuts (mandatory testing on export for aflatoxins and 30% of consignments checked)

Notifications and increased controls can have a major impact, both short-term and long-term, on exports to the EU

MINERAL OIL HYDROCARBONS – NEW MLs

Substances derived from crude oil or produced synthetically from coal, natural gas and biomass

Environmental contamination
(exhaust gases from power plants, motor engines and heating burners)

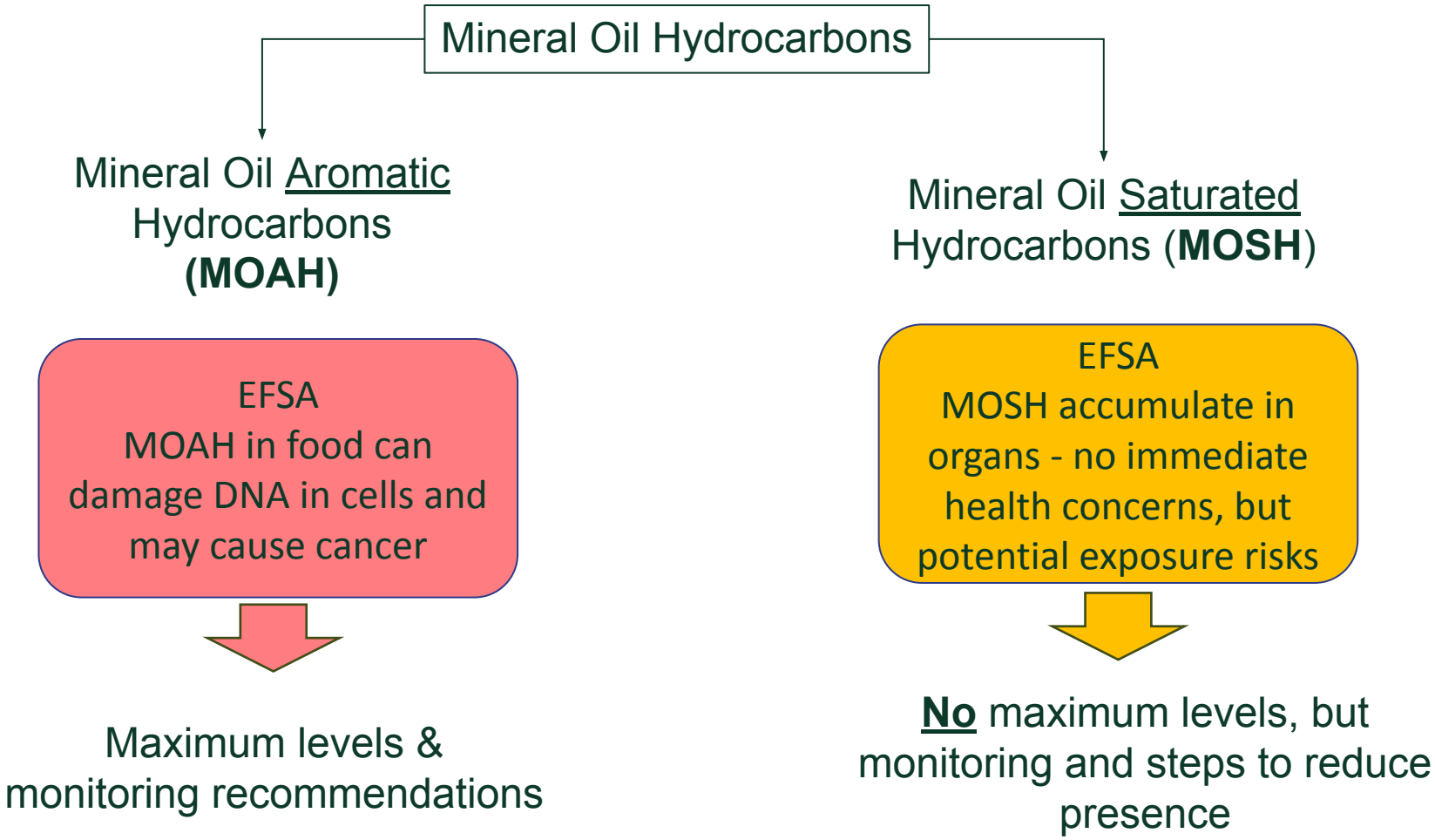
Agricultural contamination
(leakage from farm machinery, pesticides)

MOH

Migration from packaging
(jute bags, printing inks in recycled paper, wax treated paper)

Food-processing (lubricating oil, food additives/*technical aids*, extraction solvents, drying processes)

WHY EU ACTION ON MOH?



Today there are no maximum levels, but all food on the EU market must be safe. Following the EFSA evaluation, there will be MLs for MOAH in food (regardless of the source)

MOAH MAXIMUM LEVELS (MLS)

Egyptian exports concerned:

- groundnuts (falls under oilseeds), oils including olive oils (sunflower, safflower), spices, other oilseeds, rice, sunflower seeds, other cereals, cocoa butter, sesame oil, processed fish and seafood, fish oil.

Taking into consideration:

- LOQs may be higher for certain products than others due to specific ***analytical complexities***

LOQ MLs from January 2027

- oilseeds and oil fruits
- certain fats and oils
- tree nuts and pulses
- cereal grains and derived products
- milk and dairy products
- cocoa mass/cocoa powder
- foods for infants/young children

Food additives: MLs apply taking into account a processing factor

MLs higher than LOQ from January 2027 & ML reduction timelines

- certain vegetable fats and oils
- spices, dried herbs, dry tea/herbal infusions used as ingredients in food, dry instant tea/herbal infusions
- food supplements

Certain MLs only apply from a later date

- cocoa beans (1 January 2030)
- oils destined for further refining and labelled as such (1 January 2030)
- olive pomace oil and refined olive pomace oil (1 March 2028), other olive oils (1 March 2027)

SPICES, HERBS, TEAS, HERBAL INFUSIONS, FOOD SUPPLEMENTS

MOAH MLs above the LOQ in Jan. 2027 but lowering over time

Spices, Herbs, Teas and Herbal Infusions

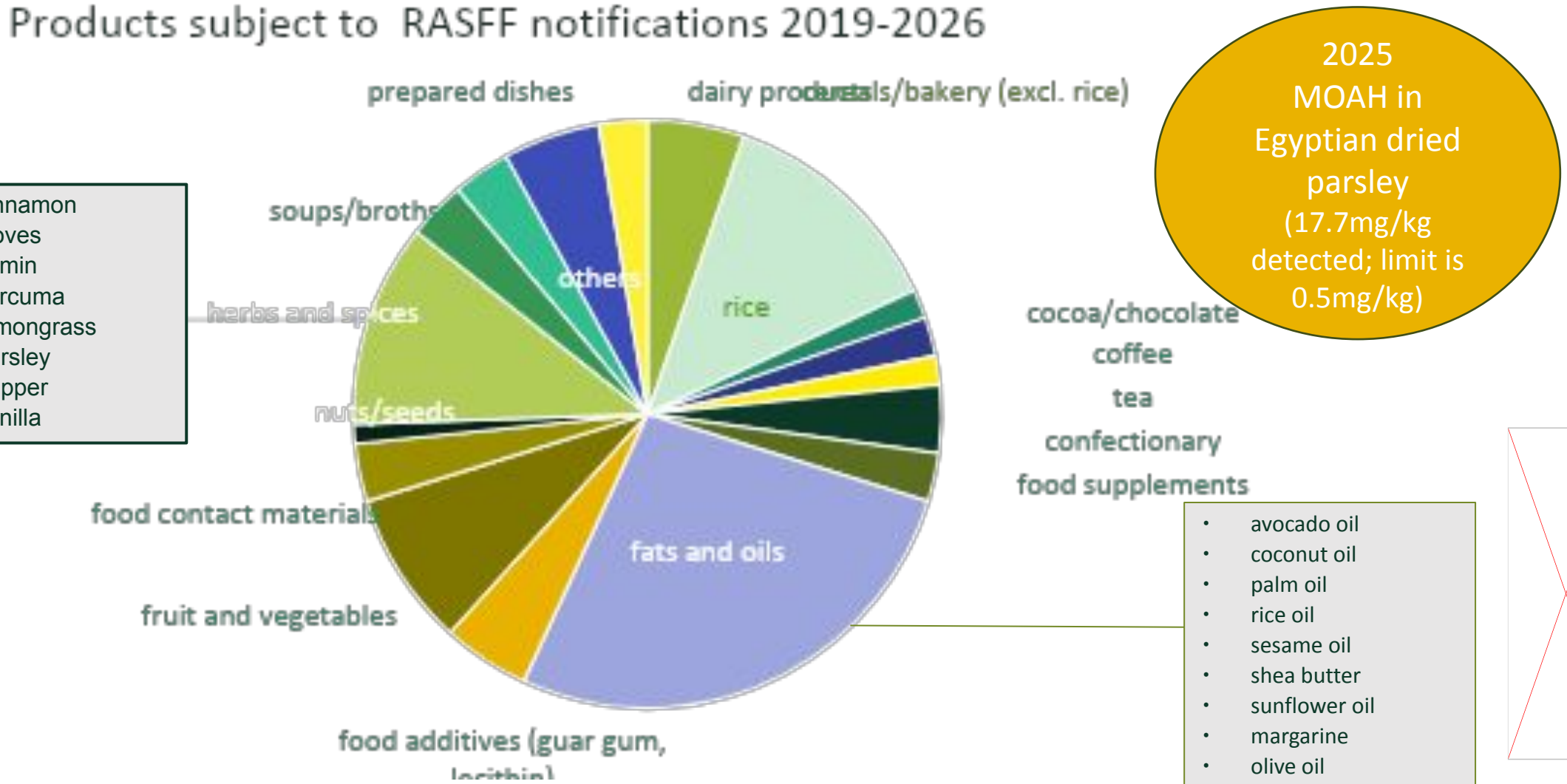
- Spices, dried herbs, dry tea and dry herbal infusions that are used as an ingredient in food, dry instant tea and dry instant herbal infusions
  - 10.0 mg/kg from 01/01/27
  - 5.0 mg/kg from 01/01/30

- No ML for tea for use in aqueous brews, as MOAH do not transfer to the brew
- No ML for tea mixtures that include spices

Food supplements

- 10.0 mg/kg from 01/01/2027
- 5.0 mg/kg from 01/01/2030

MOH DETECTIONS



- cinnamon
- cloves
- cumin
- curcuma
- lemongrass
- parsley
- pepper
- vanilla

2025 MOAH in Egyptian dried parsley (17.7mg/kg detected; limit is 0.5mg/kg)

- avocado oil
- coconut oil
- palm oil
- rice oil
- sesame oil
- shea butter
- sunflower oil
- margarine
- olive oil

Source: Rapid Alert System for Food and Feed

PACKAGING & PACKAGING WASTE REG. 2025/40













OBJECTIVES OF THE NEW PPWR RULES



Prevent the generation of packaging waste by:

- Reducing the quantity of packaging
- Restricting unnecessary single-use packaging
- Requiring reusable and refillable packaging



Reduce the need for primary materials by:

- Making recycled plastic content obligatory
- Minimising packaging and reducing void space



Boost (high quality) recycling by:

- Requiring packaging to be designed for recycling
- Harmonising labels to help the sorting of waste
- Reducing substances of concern / hindering recycling



MAIN PPWR REQUIREMENTS FOR AGRI-FOOD EXPORTS (1/2)

PPWR applies from **12 August 2026**, but individual rules apply from different dates

Category	Requirements	From
Substances of concern (SoC) in food packaging Art. 5	**SoC should be kept as low as possible.** Total amount of lead, cadmium, mercury, and hexavalent chromium together must be < 100 mg/kg.	12 August 2026
	Food-contact packaging must not exceed the Per- & Polyfluorinated Alkyl Substances (PFAS limits) set in Art. 5(5)	

Compostable packaging Art. 9	• **Sticky labels on fruit and vegetables, single use tea and coffee bags must be industrially compostable.**
	• EU countries can additionally ask for:
	  ○ this packaging to *also* be **home** compostable
	  ○ **other** packaging types to be compostable (e.g. lightweight plastic carry-bags, coffee capsules and pods)
		12 February 2028

Labelling Art. 12	Use of the same labels on packaging across the EU to inform about the composition of packaging material and help consumers to sort recyclable materials correctly.	12 August 2028
	Reusable packaging must have a label showing that the packaging can be reused.	12 February 2029
Limits on certain packaging types Art. 25	**Some packaging formats and uses are banned - including single use plastic packaging for quantities of fresh fruit and vegetables below 1.5 kg** *EU countries can individually exempt some fruits and vegetables from the ban.* *By 12 February 2027, the Commission will publish **guidelines** with examples and a non-exhaustive list of fruits and vegetables that are not included in the ban.*	1 January 2030
Packaging minimisation Art. 10	Packaging must use the smallest possible volume and weight needed for it to work properly.	

MAIN PPWR REQUIREMENTS FOR AGRI-FOOD EXPORTS (2/2)

Category	Requirements	From
Recycled content in plastic packaging Art. 7	**Minimum targets for recycled plastic per packaging component**: ○ 30% for PET packaging in contact with food ○ 10% for other contact-sensitive packaging (not PET) ○ 30% for single-use plastic beverage bottles ○ 35% for plastic packaging (not in the 3 categories above) • By 31 December 2026, rules on recycled plastic from non-EU countries that is used in plastic packaging will be adopted. • Some food contact materials could be exempted if there is not enough recycled material available.	1 January 2030
Recyclability of packaging Art. 6	Packaging must be **designed so it can be recycled**: • Methodology to assess how recyclable packaging is: expected by the end of 2027. • Waste management fee (EPR) will depend on the packaging's *Recyclability Performance Grade* (see Annex II, tables 1 and 4). **Packaging with less than 70% recyclability cannot be put on the EU market**.	
Transport packaging Art. 29	**40% of transport packaging must be reusable, except:** • **flexible packaging in contact with food (e.g. big bags, jute bags)** • **cardboard transport packaging**	
Bio-based feedstock in plastic packaging Art. 8	The EU may propose new rules on biobased plastic packaging – following a prior review of (1) how advanced the technology is, and (2) the impact of biobased plastic packaging on the environment.	12 February 2028

BISPHENOL A BAN IN FOOD PACKAGING Reg. 2024/3190

BPA and other *hazardous* bisphenol derivatives **cannot** be used to produce following food contact materials :

Ban from 20 July 2026 for:

- adhesives & printing inks
- varnishes & coatings applied to surfaces of packaging (cans, tins, jar lids)
- rubbers, ion-exchange resins
- plastics, silicones







July 2026

January 2028



Ban from 20 January 2028 for:

- **packaged fruit & vegetables** and fishery products (not fruit juices and nectars)
- food in containers where a varnish or coating manufactured using BPA has been applied only to the *exterior* metal surface

All food packaging must be accompanied by a **declaration of compliance:**

- confirming no use of prohibited bisphenols
- listing any use of non-hazardous bisphenols



ANY QUESTIONS?

Thank you

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