



Λευκωσία, 6 Αυγούστου 2019

Προς: Όλους τους εξαγωγείς γαλακτοκομικών προϊόντων

Θέμα: Νέοι όροι εξαγωγής γαλακτοκομικών προϊόντων από την Ευρώπη προς τα Ηνωμένα Αραβικά Εμιράτα (ΗΑΕ)

Κυρία/ε,

Αναφορικά με το πιο πάνω θέμα, θα θέλαμε να σας ενημερώσουμε ότι από την 31^η Μαΐου 2019 τα Ηνωμένα Αραβικά Εμιράτα έθεσαν σε εφαρμογή νέους εθνικούς κανονισμούς για τις εισαγωγές γαλακτοκομικών προϊόντων από τα Κράτη Μέλη.

Σύμφωνα με τους νέου εθνικούς κανονισμούς, όλες οι εγκαταστάσεις που παράγουν και εξάγουν γαλακτοκομικά προϊόντα στα ΗΑΕ, πρέπει να είναι εγγεγραμμένες στο «Emirates Conformity Assessment Scheme (ECAS)».

Το ECAS καθορίζει τις απαιτήσεις για την ποιότητα και την ασφάλεια για τα προϊόντα, συμπεριλαμβανομένων και των τροφίμων. Η εγγραφή στο ECAS αποτελεί απόδειξη ότι το προϊόν έχει εγκριθεί από την Ομοσπονδιακή Κυβέρνηση των ΗΑΕ.

Ως εκ τούτου, δικαίωμα διακίνησης θα έχουν μόνο τα γαλακτοκομικά προϊόντα που προέρχονται από εγκαταστάσεις που είναι εγγεγραμμένες στο εν λόγω σώμα.

Οι αρμόδιες αρχές των ΗΑΕ ενημέρωσαν την Ευρωπαϊκή Επιτροπή πως αναγνωρίζουν τα συστήματα διαχείρισης της ασφάλειας των τροφίμων που εφαρμόζονται στις εγκαταστάσεις, γι' αυτό δεν θα προβούν σε οποιαδήποτε επιτόπια επίσκεψη για αξιολόγηση των εγκαταστάσεων που εξάγουν προϊόντα στα ΗΑΕ.

Σας επισυνάπτεται η σχετική επιστολή και το παράρτημα στο οποίο αναφέρεται η διαδικασία εγγραφής της εγκατάστασης.

Με εκτίμηση,

Μιχάλης Κούλλουρος
Λειτουργός Τμήματος Βιομηχανίας
Για Γενικό Γραμματέα.



ΚΥΠΡΙΑΚΗ ΔΗΜΟΚΡΑΤΙΑ
ΥΠΟΥΡΓΕΙΟ
ΓΕΩΡΓΙΑΣ, ΑΓΡΟΤΙΚΗΣ
ΑΝΑΠΤΥΞΗΣ ΚΑΙ
ΠΕΡΙΒΑΛΛΟΝΤΟΣ

ΚΤΗΝΙΑΤΡΙΚΕΣ
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2 Αυγούστου, 2019

Προς όλες τις
Εγκεκριμένες εγκαταστάσεις μεταποίησης γάλακτος
(γαλακτοκομεία)


Θέμα: Νέοι όροι εξαγωγής γαλακτοκομικών προϊόντων από την Ευρώπη προς στα
Ηνωμένα Αραβικά Εμιράτα (ΗΑΕ).

Αναφορικά με το πιο πάνω θέμα σας πληροφορούμε ότι από την 31 Μαΐου 2019 τα Ηνωμένα Αραβικά Εμιράτα έθεσαν σε εφαρμογή νέους εθνικούς κανονισμούς για τις εισαγωγές γαλακτοκομικών προϊόντων από τα Κράτη Μέλη.

Οι νέοι εθνικοί κανονισμοί υποχρεώνουν όλες τις εγκαταστάσεις που παράγουν και εξάγουν γαλακτοκομικά προϊόντα στα ΗΑΕ, να έχουν προηγουμένως εγγραφεί στο «Emirates Conformity Assessment Scheme (ECAS)» και ως εκ τούτου δικαίωμα διακίνησης θα έχουν μόνο τα γαλακτοκομικά προϊόντα που προέρχονται από εγκαταστάσεις που είναι εγγεγραμμένες στο εν λόγω σώμα.

Επιπρόσθετα, σημειώνεται ότι οι αρμόδιες αρχές των ΗΑΕ ενημέρωσαν την Ευρωπαϊκή Επιτροπή πως αναγνωρίζουν τα συστήματα διαχείρισης της ασφάλειας των τροφίμων που εφαρμόζονται στις εγκαταστάσεις, γι' αυτό δεν θα προβούν σε οποιαδήποτε επίσκεψη για αξιολόγηση των εγκαταστάσεων που εξάγουν προϊόντα στη χώρα τους.

Σας επισυνάπτεται το παράρτημα στο οποίο αναφέρεται η διαδικασία εγγραφής της εγκατάστασής.


Δρ Απόστολος Μαζέρης
Για Αν. Διευθυντή

Κοιν: Εκτελών Χρέη Προϊσταμένου Τομέα Κτηνιατρικής Δημόσιας Υγείας
Επαρχιακούς Κτηνιατρικούς Λειτουργούς
Υπεύθυνους Κτηνιατρικών Σταθμών
Κυπριακό Εμπορικό και Βιομηχανικό Επιμελητήριο (φαξ: 22669048)

ΚΛΚΛ 2-08-2019(2) Επιστολή προς YET για τις νέες απαιτήσεις των ΗΑΕ για τις εξαγωγές γαλακτοκομικών προϊόντων

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*Limited*ANNEXFeedback EU study visit on food safety for visitors from UAE – 18-24 June 2019

A study visit on EU's food safety policy was organised for officials of UAE (from ESMA) with the objective to demonstrate the robustness of the EU food safety system. The objective is to address SPS related market access barriers affecting dairy and fruit juice exporters of the EU. The study visit took place in Denmark, Austria and 1 day at the Commission premises in Brussels. The visit included Member State officials, business representatives and Commission experts (SANTE/AGRI and TRADE). In the EU Member States the official food safety authorities were visited as well as visits to a dairy processing plant and 2 fruit juice establishments.

During the Study visit, the EU questioned the necessity of the new EQM requirements which entered into force as of 31 May 2019 as it imposes additional burdens to EU exporters for which the implementation is not always possible as it is considered overly costly and burdensome. In addition, these measures come on top of the already required health certificate and thus not add any additional safety or quality for the UAE to the EU exported products.

As an outcome of the study visit, the representatives of the UAE (ESMA) committed to assist EU establishments with their applications to fulfil the new import conditions on the Emirates Quality mark (EQM) and to facilitate trade where it is allowed under their legislative framework. We will continue to monitor this very closely.

Positive result as outcome of European Commission negotiation so far is that the EU food safety system is recognised, no additional assessments/audits are needed. Namely, an UAE letter of 17 May 2019 addressed to the Commission states following: "The UAE has recognized food safety management systems that are in place in the EU. This recognition will not require additional assessments or inspections for health and food safety requirements in the factory/premises."

The following clarifications were provided by the ESMA during the study visit:

The legislation entered into force on 31 May 2018.^[1]

EQM label requirement applies since 31 May 2019 for all products within the scope of the legislation with the exception for pasteurised camel and goat milk where the deadline is 1 December 2019.

^[1] The Cabinet Resolution No. (30) for the year 2018 about UAE Regulation for Control on Juice and Beverage Products and The Cabinet Resolution No. (29) for the year 2018 about UAE Regulation for Control on Milk and Dairy Products

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SCOPE:

Applies to following product categories:

Dairy products:

Yoghurt and Sweetened Yoghurt; Flavoured milk, laban drink, flavoured fermented laban (milk) and flavoured fermented Laban (milk) heat treated after fermentation, flavoured yogurt and also the heat treated product after fermentation; pasteurised camel milk prepared for direct consumption, raw, pasteurised, long life (treated with ultra high temperature) and sterilised goat milk; Laban and heat treated laban after fermentation.

Juice and beverage products:

Juices, mashed vegetables and Fruit Nectars; juices with milk; flavoured artificial drinks which are non-carbonated; artificial fruit juice powder; fruit drink intended for direct human consumption without dilution; guava nectar preserved by physical means and intended for direct consumption; fresh fruit juice (unpasteurised).

REQUIREMENTS:

All of these products falling within the scope of the legislation need to be labelled with the EQM (ECAS) – label.

Organic products are exempted from the EQM labelling requirements if they are on the unilateral recognition list of the UAE.

The labelling requirement is in addition to the already existing UAE requirement that all imported food need to be accompanied with a health certificate.

According to ESMA: the label can be also a sticker or any other proposal by the company to put the label can be considered. The label needs to be placed on every individual package marketed in the UAE.

Cost to be paid per product category for approval is 16,000 Emirati dirham (is approx. €3,850) with an approval validity of 3 years. This fee is NOT to be paid per location/site of the company but is valid for all sites belonging to the company. Namely if the approval is granted for the mother company than it applies for all subsidiary companies. EU applicant companies are exempted of an on-site assessment visit and therefore do not have to pay any audit cost.

Companies with questions can send request directly to ESMA for clarification.

Establishments that export the products within the scope of the legislation need to send an application accompanied with documentation demonstrating that in particular HACCP and GMP are implemented.

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Online registration for companies is possible to initiate the EQM application. According to ESMA, the application can be finalised within 8-days for EU establishments if all information is provided as no on-side audit needs to be carried out.

With regard to laboratory testing reports to be provided for the application, ESMA can accept also internal testing reports.

ESMA informed that it is their aim that also other GCC countries will accept this EQM label. Thus one label giving access to all GCC. According to ESMA discussions are ongoing but no specific timeline could be informed.

COMMENTS AND CONCERNS FOR EU COMPANIES RAISED DURING THE VISIT – ANSWERS WERE NOT RECEIVED FROM ESMA ON ALL CONCERNS:

- The label requirement entail additional costs and complexity and burdens without providing additional guarantees than those already provided by the EU exporting establishments. A health certificate is already required by UAE, therefore, the new measure is considered a duplication without adding guarantees to the safety of the products.
- The products in the scope of the legislation are considered low risk products, therefore these should not be subject to additional import measures, which are considered disproportionate.
- Is there any intention to extend the scope of products? If so, this would be problematic. Not responded by ESMA participants.
- E.g. in the new UAE legislation, guava nectar is a separate product category from fruit juices. This is not in line with International standards. 2 different product categories means 2 times payment of the EQM fee every 3 years. Could UAE bring its product categorisation in line with international standards? ESMA responded to consider this but for the time being it are considered two different categories (guava nectar and fruit juices).
- Volumes of these products exported to the UAE are often small, therefore adding this additional information on the package brings additional costs and administrative burdens within the production for these products and can only be used for the UAE market which is often not economically viable for the company.
- UAE issued another legislation a while ago that the additional costs for the companies cannot be charged to the consumer, as apparently, consumers' prices are not allowed to go up by law in the UAE (for the time being).
- This measure is considered discriminatory to the domestically producers as they produce bigger quantities and for them the additional EQM costs/burdens are thus less problematic.

The programme of the study visit can be found in the EU Market access Dbase at <http://madb.europa.eu/madb/indexMs.htm> in the restricted part of the Market Access Database (MADB). Officials of EU Member States interested in having access to the restricted part of the MADB should e-mail a request to TRADE-MARKET-ACCESS-DBASE@ec.europa.eu

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