



Understanding SPS Requirements for Egypt's Exports on the EU Market

The case of Oranges, Potatoes,
Grapes, Strawberries and Artichokes

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Abbreviations

AEC	Agriculture Export Council
AmCham	Egypt American Chamber of Commerce in Egypt
BIPM Measures	Bureau International des Poids et Mesures - International Bureau of Weights and Measures
BOD	Board of Directors
CAB	Conformity Assessment Bodies
CAPL	Central Agricultural Pesticide Laboratory
CAPQ	Central Administration for Plant Quarantine
CAPMAS	Central Agency for Public Mobilization and Statistics
CLAR	Central Laboratory for Aquaculture Research
CLFF	Central Laboratory for Food and Feed
CMC	Calibration and Measurement Capabilities
CPHL	Central Health Public Health Laboratories
CSR	Corporate Social Responsibility
EBA	Everything But Arms
EC	European Communities
EGAC	Egyptian Accreditation Council
EOS	Egyptian Organisation of Standardisation and Quality
EPA	Economic Partnership Agreement
ES	Egyptian Standard
EU	European Union
EUREPGAP	Euro-Retailer Working Group Good Agricultural Practices
FAO	Food and Agriculture Organization

FAIRS	Food and Agricultural Import Regulations and Standards
FBO	Food Business Operators
FDI	Foreign Direct Investment
GAP	Good Agricultural Practices
GDP	Gross Domestic Product
GHP	Good Hygiene Practice
GlobalGAP	Global Partnership for Good Agricultural Practice
GMP	Good Manufacturing Principles
GOEIC	General Organisation for Export and Import Control
GOVS	General Organization for Veterinary Services
HACCP	Hazard Analysis and Critical Control Points
HEIA	Horticultural Export Improvement Association
IOE	World Organisation for Animal Health
IPPC	International Plant Protection Convention
ISPMs	International Standards for Phytosanitary Measures
ISO	International Organisation for Standardization
LDC	Least Developed Country
MALR	Ministry of Agriculture and Land Reclamation
MOH	Ministry of Health
MOTI	Ministry of Trade and Industry
MSME	Micro, Small and Medium-sized Enterprise
NFSA	National Food and Safety Authority
NIS	National Institute for Standards
NRC	National Research Center
NQC	National Quality Council
OIE	World Organisation for Animal Health

PM	Prime Minister
QA	Quality Assurance
QI	Quality Infrastructure
RCFF	Regional Centre for Food and Feed
SME	Small and Medium Enterprises
SPS	Sanitary and Phytosanitary
UNIDO	United Nations Industrial Development Organisation
USDA	United States Department of Agriculture
WHO	World Health Organization
WRCL	Weed Research Central Laboratory
WTO	World Trade Organization

SECTION 1

Background

1.1 What are Sanitary and Phytosanitary Measures?

In today's increasingly globalised world, international trade is a key aspect of any country's development agenda, particularly those in the developing world. Historically, trade has been regarded as a means of boosting the economy and contributing substantially towards various countries' development goals. It is therefore not surprising that boosting export potential remains a priority for developing countries. The European Union (EU) provides African countries with preferential market access schemes and is the region's main export destination for food and manufactured products.¹ The EU also supports trade-driven development in Sub Saharan Africa with initiatives such as the Economic Partnership Agreements (EPAs), Generalised System of Preferences (GSP) and the Everything-But-Arms (EBA – specifically for LDCs) schemes. At present, the EU under the EPA is the most open market for African exports as it provides the region with duty-free and quota-free market access.²

Over time, African exports to the EU have increased and amounted to more than €116 billion in 2016.³ As of 2019, 65 per cent of African exports to the EU were primary goods such as food and raw materials.⁴ Although the EU provides a free and stable market to African exporters, a crucial component of international trade of food and raw materials are health and safety standards. Therefore, in a free and pro-trade environment, there is pressure on both importing and exporting countries to comply with international regulatory systems with regards to health and safety standards of traded goods.

Developing countries tend to be wary of trade regulations and often regard them as protectionist and exploitative measures. While there are restrictions and measures on trade that act as barriers to international commerce, Sanitary and Phytosanitary (SPS) measures are aimed at protecting human, animal and plant life and health, in a manner that does not necessarily create barriers to trade. SPS measures should be 'based on sound scientific methods' and are applied only to the extent necessary to protect human, animal or plant life or health' and are not 'created to arbitrarily or unjustifiably discriminate between countries where identical or similar conditions prevail.'⁵

1

https://trade.ec.europa.eu/doclib/docs/2017/november/tradoc_156399.pdf

2

https://trade.ec.europa.eu/doclib/docs/2013/april/tradoc_151010.pdf

3

https://trade.ec.europa.eu/doclib/docs/2017/november/tradoc_156399.pdf

4 https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Africa-EU_-_international_trade_in_goods_statistics

5 https://connecting-asia.org/wp-content/uploads/2018/05/GIZ_ACFTA_SPS_Study_2017.pdf

While at the outset trade regulations could seem as protectionist measures, this study aims to highlight how compliance with the SPS measures strengthens both trade and market access, while simultaneously respecting health regulations. This study focuses on the international standards set under the SPS Agreement and the need for Small and Medium Enterprises with export potential in certain sectors, to better understand SPS and related issues, to leverage the EU market access.

On January 1, 1995, the World Trade Organization (WTO) established the Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement). The SPS measures are applied to both domestically produced and imported goods to protect human and animal health (sanitary measures) and plant health (phytosanitary measures). These measures are aimed at preventing the spread of pests or diseases among animals and plants and include a range of criteria 'such as requiring products to come from a disease-free area, inspection of products, specific treatment or processing of products, setting of allowable maximum levels of pesticide residues or permitted use of only certain additives in food.'⁶

While these measures establish the basic rules for food safety and animal and plant health standards, they ensure that consumers are being supplied with safe and healthy foods and, also endeavour to avoid unnecessary and arbitrary barriers to trade.⁷ The Agreement calls on member countries to apply the

appropriate level of SPS measures and simultaneously avoid 'discrimination or disguised restriction on international trade.'⁸ It has, indeed, been rightly acknowledged that technical measures such as the SPS measures do impede trade but non-compliance with these measures has far greater negative consequences. Not only does the rejection of an entire shipment at the port of entry result in a 'loss of both the revenue expected from the sale of the goods and the costs of their transportation, especially when the goods have to be destroyed', repeated export refusals 'damage the reputation of the exporting country and, one would expect, its trade performance'.⁹

Empirical studies suggest that when developing countries strengthen their ability to meet the demands of the world trading system, in terms of both competitive prices and quality and safety standards, their export potential and market share increases.¹⁰ Analysis of the SPS measures concerning agricultural trade reveals that issues of food safety related to disease outbreaks and pest control rank highest. Therefore, compliance with the SPS Agreement boosts the trading potential of developing countries and LDCs.¹¹

The Agreement provides international regulations to member states but also recognizes their rights to use their own measures to protect plant, human and animal health, as long as those measures are based on science. Despite this, the Agreement encourages governments to 'harmonize' their national measures by basing them on

⁶ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm
⁷ <http://spsims.wto.org/>
⁸ WTO 'The Legal Texts' p62
⁹ http://www.cuts-geneva.org/pdf/KP2018-Paper-Importance_and_Implications_of_SPS_Measures_in_MEN_A.pdf

¹⁰ http://www.cuts-geneva.org/pdf/KP2018-Paper-Importance_and_Implications_of_SPS_Measures_in_MEN_A.pdf
¹¹ http://www.cuts-geneva.org/pdf/KP2018-Paper-Importance_and_Implications_of_SPS_Measures_in_MEN_A.pdf

international standards.¹² International standards are developed in consensus with most of the WTO's 132 member countries along with the input of leading scientists and government experts on health.¹³ International standards are usually more stringent than national standards. However, in cases where national standards levy greater restrictions on trade, the country may be asked to provide scientific justification for their standards.

As the WTO is not a regulatory body with norm-setting capacity, it cannot harmonize the standards.¹⁴ Therefore, the WTO has relied upon three leading international standard-setting organisations in the fields of human, animal or plant health, to harmonize the standards and facilitate trade that safeguards the health of consumers. The international standard-setting organisations are- The Codex Alimentarius Commission, the World Organisation for Animal Health (OIE) and the International Plant Protection Convention (IPPC), each focusing on one aspect of the SPS issues- food safety; human and animal health; and plant health, respectively. Together these three organizations are referred to as 'The Three Sisters'.¹⁵

1.2 The Three Sisters

The Codex Alimentarius Commission (CAC)

The Codex Alimentarius Commission, a science-based organization and a subsidiary

organ of the Food and Agriculture Organization (FAO), based in Rome, is the authority that drafts international food safety standards for the SPS measures. The Codex Alimentarius Commission consists of a number of food safety standards. The Commission is funded by both the FAO and the World Health Organization (WHO), which established the Codex in the 1960s after recognizing the crucial importance of international public health protection and the minimization of disruption of global trade in food products. The founders considered harmonization of food regulations as an efficient tool to address these two concerns.¹⁶ Presently, the Codex Alimentarius Commission has 189 members, with 188 states and one member organization (the EU) among them.¹⁷

The World Organisation for Animal Health (OIE)

The World Organization for Animal Health (OIE) is, as the name suggests, the world organisation concerned with animal health. It was founded in 1924 and develops, amongst others, health standards for trade in animals as well as animal products. Also, it develops recommendations and guidelines with regards to animal health. In 1998, formal cooperation between the WTO and the OIE was agreed on.¹⁸ Currently, the OIE has 182 member countries.¹⁹

¹²

https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

¹³

https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm
https://unctad.org/en/Docs/edmmisc232add13_en.pdf

¹⁵<https://www.carecinstitute.org/wp-content/uploads/2015/06/2015-SPS-TKM-2015-SPS-TKM-10-SPS-Agreement-and-Three-Sisters.pdf>

¹⁶

https://www.wto.org/english/thewto_e/coher_e/wto_codex_e.htm

¹⁷ <http://www.fao.org/fao-who-codexalimentarius/about-codex/members/en/>

¹⁸

https://www.wto.org/english/thewto_e/coher_e/wto_oie_e.htm

¹⁹ <https://www.oie.int/about-us/our-members/member-countries/>

The International Plant Protection Convention (IPPC)

Introduced by the International Standards for Phytosanitary Measures (ISPMs), the International Plant Protection Convention (IPPC), is an intergovernmental treaty, signed by over 180 countries to 'protect the world's plant resources from spreading the introduction of pests and promoting safe trade'.²⁰ Established in 1992 and based in the Food and Agriculture Organization (FAO's) headquarters in Rome, the IPPC Secretariat, 'coordinates the work of IPPC contracting parties to achieve the Convention's goals.'²¹ As one of the 'Three Sisters' of the SPS Agreement, the convention plays a crucial role in international trade as it establishes the standards for phytosanitary measures and oversees their harmonization. While the IPPC standards are not legally binding, 'WTO members are required to base their phytosanitary measures on international standards developed within the framework of the IPPC'.²²

The SPS Committee

The SPS Agreement established the SPS Committee in 1995 to function as a special forum to exchange information on all aspects related to the implementation of the SPS measures. The Committee meets three times each year and offers WTO members an opportunity to discuss trade concerns

regarding the SPS requirements. Since its inception in 1995, over 340 trade-specific concerns have been raised by member states in the Committee.²³ All of the WTO's member countries along with observer countries and international organizations are on the Committee.²⁴

The Committee 'reviews compliance with the agreement, discusses matters with potential trade impacts, and maintains close co-operation with the appropriate technical organizations.'²⁵ Under the SPS Agreement, the Committee also monitors the process of international 'harmonization' of measures and 'coordinates efforts in this regard with relevant organisations.'²⁶ The SPS Committee has developed a formal mechanism to safeguard the interests of developing countries by analysing how proposed or finalised SPS measures affect LDCs. The framework enables developing countries to discuss significant difficulties that they face due to the measures proposed by the Committee and to find possible solutions to them. The framework provides a platform for discussions and policy ramifications on important issues.²⁷

1.3 Information on private standards

Notwithstanding the long history of private product standards, there is a recent rise of formal private standards.²⁸ Retailers as well

²⁰ <https://www.ippc.int/en/about/overview/>

²¹ <https://www.ippc.int/en/about/overview/>

²² <https://www.ippc.int/en/ippc-and-international-trade/>

²³ <http://www.tradeforum.org/The-SPS-Agreement-WTO-Agreement-on-the-Application-of-Sanitary-and-Phytosanitary-Measures/>

²⁴ http://www.fao.org/fileadmin/templates/est/meetings/cis_wto/5_Alcala_SPS_Agreement_and_Implementation.pdf

²⁵ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

²⁶ WTO 'The Legal Texts' pg 61

²⁷ https://www.wto.org/english/tratop_e/sps_e/spsagr_e.htm

²⁸ <https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf> ;

<https://www.intracen.org/export-quality-management-a-guide-for-small-and-medium-sized-exporters-second-ed/> ; https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord

as supermarkets require more and more compliance with private standards related to food safety, labour conditions, environment and animal welfare, as well as health.²⁹ There are a number of factors behind the rise in private product standards, including consumers' food safety concerns and companies' growing attention to Corporate Social Responsibility (CSR). Currently, there are about 400 private schemes, which take on a variety of forms, including schemes developed by individual companies, and industry-wide collective schemes with international reach.³⁰

Despite the voluntary nature of the private schemes and the absence of a requirement by law to respect these standards, many private standards can be considered as being *de facto* mandatory. In cases where private standards become the norm in a particular industry, suppliers are left with little choice but to comply with the standards. Due to the rising importance of private standards, one can argue that they are at times even more powerful than public standards.³¹

For suppliers in developing countries, private standards can have positive and negative

impacts. A possible positive impact relates to the trade-creating effect of compliance with the standards. When suppliers succeed in improving their products' quality, for instance by investing in physical and human capital development, they can gain or maintain access to markets.³²

On the other hand, potential negative impacts are linked to the high burden of the costs of compliance with private standards for suppliers in developing countries. Suppliers can face heightened challenges in meeting the standards. This can result in additional barriers to market access, and the costs of compliance can hinder economic development. In addition, due to the numerous private standards, exporters are required to collect information on all relevant standards and ensure compliance with them.³³ Moreover, there are doubts about whether private standards go beyond what is scientifically justified. Concerns exist that standards might be manipulated by protectionist lobbies.³⁴

Within the SPS Agreement, it has not been specified whether private standards are SPS measures. This lack of clarity is reflected in

[d=True&HasFrenchRecord=True&HasSpanishRecord=True](#)

²⁹ Fulponi, L. (2006). Private voluntary standards in the food system: The perspective of major food retailers in OECD countries. *Food Policy*, 31(1), 1-13.

³⁰https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-

[DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True](#)

³¹<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf> ;

<https://www.intracen.org/export-quality-management-a-guide-for-small-and-medium-sized-exporters-second-ed/> ; [https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,878](https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True)

³²<https://www.oie.int/doc/ged/D6061.PDF>

https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,878

[18,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True](#)

<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf> ; Fulponi, L. (2006). Private

voluntary standards in the food system: The perspective of major food retailers in OECD countries. *Food Policy*, 31(1), 1-13.

³³<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>

<https://www.oie.int/doc/ged/D6061.PDF>

https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

³⁴ Messerlin, P., Nielson, J., Zedillo, E., & Projet Objectifs du millénaire. (2005). *Trade for development*. London ; Sterling : New York: Earthscan ; Millennium Project.

ongoing debates about whether setting private standards is legitimate, or whether governments are solely responsible for standards included in the scope of the Agreement.³⁵

EUREPGAP/GlobalGAP: one example of private standards

One instance of a private standard for good agricultural practices is the EUREPGAP/GlobalGAP farm assurance programme which focuses on food security of agricultural products, environmental management of the farms concerned, as well as the wellbeing, security and health of workers. In 1997, EUREPGAP (full name: Euro-Retailer Working Group Good Agricultural Practices) was initiated by retailers forming part of the Euro-Retailer Produce Working Group (EUREP), an association of European supermarkets. In 2007, in recognition of the increasing global reach, it was renamed as the Global Partnership for Good Agricultural Practice (GlobalGAP).³⁶

GlobalGAP has united a variety of voluntary private quality standards under one umbrella. It covers, amongst others, coffee, tea, fruits

and vegetables, and is a so-called pre-farm-gate standard, meaning that the certificate applies to the planting of the seed until transportation of produce away from the farm. An increasing number of products are certified with the GlobalGAP standard, reflecting its growing relevance.³⁷

A number of requirements need to be fulfilled in order to obtain certification by the GlobalGAP standard. These include but are not limited to; the registration of the production farm, the use of plastic and containers, as well as social aspects. Farmers can apply for certification, after having carried out a self-inspection and undergoing an external inspection conducted by a certification body.³⁸

There is controversy about the effects of GlobalGAP on producers in developing countries, particularly in Africa. Evidence shows that smallholder farmers in particular face difficulties in achieving compliance with the standards. As Humphrey maintains, compliance by small farmers with GlobalGAP is almost unachievable without out-grower schemes.³⁹ Considering that compliance with GlobalGAP and other private standards has become a market access condition, failure to

³⁵

<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>
<https://www.oie.int/doc/ged/D6061.PDF>
https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>
<https://www.control-union.fr/control-union/Agriculture-GlobalGAP-fr>; Henson et al – Do Fresh Produce Exporters in Sub-Saharan Africa Benefit from GlobalGAP Certification?

³⁷

<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>
<https://www.control-union.fr/control-union/Agriculture-GlobalGAP-fr>
Henson et al – Do Fresh Produce Exporters in Sub-Saharan Africa Benefit from GlobalGAP Certification?
Humphrey – Private Standards, Small Farmers and Donor Policy: EUREPGAP in Kenya.
<https://opendocs.ids.ac.uk/opendocs/bitstream/handle/20.500.12413/4167/Wp308.pdf>

³⁸<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>; Asfaw – Does EurepGap standard marginalize poor farmers? Evidence from Kenya

³⁹ Humphrey – Private Standards, Small Farmers and Donor Policy: EUREPGAP in Kenya.; <https://opendocs.ids.ac.uk/opendocs/bitstream/handle/20.500.12413/4167/Wp308.pdf>

comply with the standards can have adverse effects on the economic performance of the smallholder farmers concerned. Once compliance is achieved, however, there is evidence of positive impacts on the productivity and market access of the respective farmers.⁴⁰

1.4 Why SPS measures?

The overall aim of SPS certification is to strike a balance between ensuring food safety and animal and plant health standards on the one hand and avoiding unnecessary barriers to trade on the other hand. The Agreement encourages countries to adhere to international standards, but allows them to adopt their own, national standards, as long as they are scientifically justified, and only to the extent necessary to protect human, animal or plant life or health.⁴¹ The emphasis on 'harmonization' as part of the SPS Agreement, facilitates trade and export competitiveness by reducing the need for governments and producers to adhere to different standards and procedures in different markets thus making trade more streamlined. The disagreements and conflicts of health and safety measures in international trade have huge costs in terms of lost markets, incomes and food security.⁴² With the global climate change crisis, the emergence and global dissemination of plant health hazards are an imminent risk, making the implementation and the harmonization of the SPS measures both crucial and timely.⁴³

Considering the general reduction of trade barriers, the use of sanitary or phytosanitary

restrictions for protectionist purposes can appear attractive to governments. After all, due to the technical complexity, the scientific necessity of a particular trade restriction can be difficult to challenge. The SPS Agreement, however, seeks to avoid this abuse of sanitary and phytosanitary measures, in particular by clarifying which factors governments can take into account when assessing necessary SPS measures. According to the SPS Agreement, when changing trade-related sanitary and phytosanitary requirements, they are required to give notice to other countries and also be open to scrutiny about their regulations.⁴⁴

This suggests that producers in developing countries should benefit from the SPS Agreement for several reasons. First, based on the Agreement, developing countries can challenge unjustified trade restrictions, irrespective of their economic and political strength. Second, if private standards are also considered as SPS measures, the Agreement provides protection from arbitrary private standards. Third, resulting from the increasing harmonization of SPS measures, uncertainty among producers in developing countries about the required conditions for exporting to particular countries is expected to be reduced. Looking beyond producers in developing countries, consumers are also expected to benefit due to the improvements in the quality of food resulting from the measures applied.⁴⁵

1.5 The need for technical assistance

⁴⁰ Henson et al – Do Fresh Produce Exporters in Sub-Saharan Africa Benefit from GlobalGAP Certification?

⁴¹ <http://www.cuts-geneva.org/pdf/SSEA-Geneva%20Note1.pdf>

https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

Athukorala, P., & Jayasuriya, S. (2003)

⁴²

https://www.ippc.int/static/media/files/publication/en/2017/10/5_Krivosos_IPPC_trade_revised.pdf

⁴³

https://www.ippc.int/static/media/files/publication/en/2017/10/5_Krivosos_IPPC_trade_revised.pdf

⁴⁴

https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

⁴⁵

https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

Developing countries tend to face a higher burden than developed countries in complying with SPS measures. This is due to primarily two reasons. First, the requirements usually concern agricultural products, upon which developing countries are in many cases dependent. Second, the technical knowledge, adequate production facilities as well as necessary infrastructure are oftentimes lacking in developing countries. These challenges can even incentivise developing countries to specialise away from sectors with the highest regulatory measures, leading to an alternation of countries' export patterns.⁴⁶

In response to these challenges, Article 9 of the SPS Agreement specifies that Members

agree to facilitate the provision of technical assistance to other Members, especially developing country Members, either bilaterally or through the appropriate international organizations. Also, the WTO Secretariat provides technical assistance. This mainly includes workshops and seminars on provisions of the Agreement and implementation strategies.⁴⁷

This and further technical assistance are crucial for developing countries to meet the high compliance costs resulting from SPS measures. As Athukorala and Jayasuriya maintain, "this is an area where there is a clear need for providing 'aid for trade'".⁴⁸

⁴⁶ https://unctad.org/en/PublicationsLibrary/itcdtab70_en.pdf ; Athukorala, P., & Jayasuriya, S. (2003)<http://www.cuts-geneva.org/pdf/SSEA-Geneva%20Note1.pdf>

⁴⁷ https://www.wto.org/english/tratop_e/sps_e/spsagr_e.htm
⁴⁸ Athukorala, P., & Jayasuriya, S. (2003), p. 1413

SECTION 2

Egypt Agricultural Exports to the EU Market

2.1 Context

Although Small and Medium Enterprises (SMEs) in the agricultural sector in Egypt have the potential to export and leverage lucrative markets such as the EU, they are often faced with several challenges that include limited knowledge and capacity to comply with Good Agricultural Practices (GAP), which has affected their capacity to grow and scale-up through international trade. This is further exacerbated by the lack of well-functioning and accessible infrastructure, especially for testing, inspection, certification, and accreditation services.

There is a need for firms, particularly SMEs to gain the requisite support, training and capacity building necessary to conform with measures necessary for the export of agricultural products in international markets. This would improve their capacity to negotiate for good prices and increase the marketability of their exports. Among the critical requirements for exports is conformity to SPS measures, which are aimed at protecting humans, animals, and plants from health and economic risks related to additives, contaminants, toxins, pests, and diseases. Such SPS requirements are stricter in countries like those in the EU, where there is increased awareness of food safety. While most firms, especially SMEs, find it challenging to meet such requirements, negotiating for reduction or elimination of such measures is not an option.

The Egyptian economy would be greatly boosted through the development of quality infrastructure and related services for the improvement of product quality. Compliance with quality aspects in production improves the quality of products. Improved access to quality services would enable firms to reliably check and certify the quality of their products. By complying with and proving product standards, firms, including SMEs, would be better positioned to access international markets, establish supplier relationships and integrate themselves into the value chains of international companies.

This study focuses on requirements related to SPS measures of select products with potential for SMEs in Egypt. The end goal is to provide comprehensive insights on SPS and related requirements for the five selected products of Oranges, Grapes, Potatoes, Artichokes and Strawberries.

2.2 The Objective of the Study

This study is meant for Egypt SMEs and agro-exporters, as part of an effort to further highlight the challenges they face to conform with stringent SPS and quality requirements. Its ultimate objective is to support their inclusion into the country's value chain and increase their exports to the EU Market by raising their awareness about the SPS standards of a number of key Egyptian agricultural exports to the EU Market, as well

as the procedures and requirements to conform to these standards and ensure their products are accepted into the EU Market.

2.3 Methodology and Study Outputs:

Through field and desktop research, this study provides information on regulatory and commercial requirements of SPS measures for Egypt's agricultural exports with a special focus on five selected products. It documents the range of stakeholders and services involved in SPS-related quality infrastructure such as quality assurance, standardisation, accreditation, metrology, and certification measures in Egypt. It is based on a review of relevant laws, regulations and licensing requirements as provided by mandated government ministries and agencies, as well as Conformity Assessment Bodies (CABs) and other international and regional directorates.

A complementary manual has also been prepared alongside this study. The manual aims to document the SPS certification processes of the selected products by identifying key quality assurance institutions involved, processes to be followed by exporters for certification and associated fees.

2.4 Review of the Select Products with Potential for Export to the EU Market

Oranges

According to the Head of the Central Administration for Agricultural Quarantine Ahmed el Attar, Egypt has surpassed Spain and is now the world's first exporter of oranges⁴⁹. El Attar highlighted that Orange is Egypt's most exported agricultural product as its total exports hit 1.3 million tons at the beginning of the year 2020, while Egypt's total exports of agricultural products exceeded 2.2 million tons in January 2020⁵⁰. When it comes to the EU market, Egypt continues to be a key exporter of oranges to the EU over the last five years.

Based on data from Egypt's Central Agency for Public Mobilization and Statistics (CAPMAS), Egypt orange exports are currently most popular in six European countries, namely Netherlands, United Kingdom, Italy, Romania, Finland and Cyprus.

Netherlands Market: Netherlands accounts for about a third of Egypt's orange exports to EU (37.35%) with about 81.42% of the orange's exports value and the price/ ton at 0.86 thousand \$ as the average through the study period.

⁴⁹ <https://www.egypttoday.com/Article/3/85265/Egypt-tops-world-countries-in-orange-exports>

⁵⁰ Ibid, 2020

United Kingdom Market: United Kingdom market is the second largest orange export destination in the EU. It consumes more than of fifth of Egypt's orange's exports to EU (21.68%) with about 18.10% of the orange's exports value and the price/ ton at 0.30 thousand \$ as average through the study period.

Italy Market: Italy market is the third biggest orange exportation market in EU. The country imports about 4.06% of the Egyptian oranges with about 4.25% of the orange's exports value and the price/ ton at 0.38 thousand \$ as average through the study period.

Romania Market: Romania market imports about 4.32% of the Egyptian oranges with about 4.55% of the orange's exports value

and the price/ ton at 0.39 thousand \$ as average through the study period.

Lithuania Market: Lithuania imports about 4.01% of the Egyptian oranges with about 4.97% of the orange's exports value and the price/ ton at 0.45thousand \$ as average through the study period

Finland Market: Finland market imports about 3.39% of the Egyptian oranges with about 4.24% of the orange's exports value and the price/ ton at 0.46 thousand\$ as average through the study period.

Table 1 below illustrates the oranges exports to the above countries and the market share for each country, while Table 2 shows the oranges export values to the same countries.

TABLE (1): ORANGES EXPORTS QUANTITIES IN THOUSAND TONS TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Netherlands		United Kingdom		Italy		Romania		Lithuania		Finland		Total Exports to EU
	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	
2015	72.97	35.64	57.36	28.02	10.90	5.32	9.27	4.53	12.10	5.91	10.90	5.32	204.73
2016	104.20	40.58	65.83	25.64	7.57	2.95	7.58	2.95	9.99	3.89	11.65	4.54	256.75
2017	128.28	42.81	63.60	21.22	22.23	7.42	14.03	4.68	8.56	2.86	9.15	3.05	299.65
2018	153.10	42.85	76.24	21.34	15.67	4.39	13.14	3.68	14.63	4.09	9.12	2.55	357.31
2019	28.80	27.41	15.45	14.71	2.26	2.16	6.89	6.56	4.03	3.84	2.51	2.39	105.05
Average	97.47	37.35	55.70	21.68	11.73	4.06	10.18	4.32	9.86	4.01	8.66	3.39	244.70

Source: CAPMAS, Foreign trade data, Unpublished data.

TABLE (2): ORANGES EXPORTS VALUES IN MILLION \$ TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Netherlands		United Kingdom		Italy		Romania		Lithuania		Finland		Total Exports to EU
	Exports value	%	Exports value	%	Exports value	%	Exports value	%	Exports value	%	Exports value	%	
2015	22.91	33.60	15.29	22.43	4.05	5.94	3.30	4.85	5.42	7.95	5.05	7.41	68.17
2016	104.20	112.88	22.54	24.42	2.50	2.71	2.46	2.67	4.01	4.35	4.88	5.29	92.31
2017	128.28	114.31	19.40	17.29	9.09	8.10	6.30	5.61	3.88	3.45	4.13	3.68	112.22
2018	153.10	111.06	22.96	16.66	6.98	5.06	5.64	4.09	6.95	5.04	4.27	3.10	137.85
2019	28.80	74.31	4.77	12.32	0.82	2.11	2.55	6.59	1.96	5.05	1.19	3.06	38.75
Average	87.46	81.42	16.99	18.10	4.69	4.25	4.05	4.55	4.44	4.97	3.90	4.24	89.86

Source: CAPMAS, Foreign trade data, Unpublished data.

Grapes

Based on data from CAPMAS, Egypt's grape exports to the EU in the last 5 years (2015-2019) were mainly made to four countries: Netherlands, United Kingdom, Germany, and France.

a) Netherlands Market: Netherlands is considered the largest grapes exportation market for Egypt in the EU. It imports about half of the grape's exports to EU, 47.13% of exports with about 51.07% of the grapes exports value and the price/ ton being USD 0.35 thousand as average through the study period.

b) United Kingdom Market: United Kingdom is the second largest grapes exportation market in the EU. It consumes approximately 41.58% of exports with about 40.57% of the grapes exports value and the price/ ton was USD 1.02 thousand as average through the study period.

c) Germany Market: Germany is the third grapes exportation market in the EU. It imports about 11.08% of the Egyptian grapes with about 13.63% of the grape's exports value and the highest price/ ton which was USD 1.79 thousand as average through the study period.

d) France Market: France imports about 0.37% of the Egyptian grapes with about 0.23% of the grapes exports value and the price/ ton was USD 1 thousand as average through the study period.

In 2019, Egypt's exports of grapes to the EU increased to about 439.50 thousand, valued at about USD 155.57 million, as illustrated in Tables 3 and 4.

Potatoes

According to CAPMAS, Egyptian exports of potatoes to EU in the period 2015-2019 reached about 187.30 thousand tons valued at USD 57.64 million, the export price of per ton was about USD 0.36 thousand as an average through the study period. Potatoes exports to the European Union countries were mainly centred in three countries, respectively Greece, Italy, and Germany.

a) Greece Market: Greece is the largest potatoes exportation market in EU, it imports about 37.46% of the EU imports of Egyptian potatoes with about 35.48% of the potatoes exports value and the price/ ton was USD 0.34 thousand as average through the study period.

b) Italy Market: Italy imports 30.40% of the potato's exports to the EU with about 30.71% of the potatoes exports value and the price/ ton was USD 0.36 thousand as average through the study period.

c) Germany Market: Germany was the third major potatoes exportation market in the EU. It imports about 15.40% of the Egyptian potatoes, about 16.05% of the potato's exports value and the highest price/ ton which was USD 0.38 thousand as average through the study period

TABLE (4): GRAPES EXPORTS QUANTITIES IN THOUSAND TONS TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Netherlands		United Kingdom		Germany		France		Total Exports to EU
	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	
2015	20.48	24.54	32.07	38.43	13.99	16.77	0.46	0.55	83.45
2016	24.95	29.46	37.92	44.76	9.58	11.31	0.09	0.10	84.72
2017	27.03	36.19	27.35	36.62	10.59	14.18	0.13	0.18	74.68
2018	28.35	36.26	28.15	36.00	12.68	16.22	0.07	0.09	78.20
2019	134.82	30.68	240.79	54.79	16.84	3.83	33.89	7.71	439.50
Average	47.13	31.10	73.26	41.58	12.74	11.08	6.93	0.37	152.11

Source: CAPMAS, Foreign trade data, Unpublished data.

TABLE (5): GRAPES EXPORTS VALUES IN MILLION \$ TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Netherlands		United Kingdom		Germany		France		Total Exports to EU
	Exports value	%	Exports value	%	Exports value	%	Exports value	%	
2015	45.21	26.29	81.82	47.58	22.16	12.89	1.06	0.62	171.96
2016	46.27	29.96	73.11	47.34	17.66	11.43	0.17	0.11	154.45
2017	59.16	37.07	58.19	36.46	21.42	13.42	0.25	0.16	159.60
2018	55.11	34.33	59.70	37.19	26.41	16.46	0.27	0.17	160.51
2019	49.60	31.88	55.97	35.98	22.46	14.44	0.56	0.36	155.57
Average	51.07	31.69	65.76	40.57	22.02	13.63	0.46	0.23	160.42

Source: CAPMAS, Foreign trade data, Unpublished data.

TABLE (6): POTATOES EXPORTS QUANTITIES IN THOUSAND TONS TO THE MAIN EU COUNTRIES THROUGH THE PERIOD 2015-2019.

Year	Greece		Italy		Germany		Total Exports to EU
	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	
2015	54.28	36.83	66.80	45.33	16.49	11.19	147.37
2016	38.76	28.24	57.57	41.94	28.57	20.81	137.26
2017	85.81	42.44	63.37	31.34	31.33	15.49	202.21
2018	63.41	41.03	31.43	20.34	30.93	20.01	154.57
2019	120.20	40.73	63.23	21.43	35.40	12.00	295.11
Average	72.49	37.46	56.48	30.40	28.54	15.40	187.30

Source: CAPMAS, Foreign trade data, Unpublished data.

TABLE (7): POTATOES EXPORTS VALUES IN MILLION \$ TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Greece		Italy		Germany		Total Exports to EU
	Exports value	%	Exports value	%	Exports value	%	
2015	19.26	36.05	23.73	44.41	5.96	11.16	53.43
2016	15.04	26.20	22.58	39.34	14.58	25.39	57.41
2017	27.10	38.65	22.98	32.78	11.35	16.18	70.12
2018	17.21	38.23	10.13	22.50	8.97	19.93	45.02
2019	45.02	40.30	23.68	21.20	13.03	11.66	111.70
Average	24.73	35.48	20.62	30.71	10.78	16.05	67.54

Source: CAPMAS, Foreign trade data, Unpublished data

Strawberries

Tables 8 and 9 are based on data from CAPMAS and they show that Strawberry exports to the European Union countries in the last 5 years (2015-2019) were mainly confined to five countries, respectively Germany, Belgium, United Kingdom, Netherlands, and France.

a) Germany Market: Germany is the largest strawberry exportation markets in the EU. It accounts for about a third of the strawberry exports to EU (33.87%) with about 31.78% of the exports value and the price/ ton being USD 2.63 thousand as average through the study period.

b) Belgium Market: Belgium is the second largest strawberry exportation market in the EU. It consumes 28.42% of the exports, with about 14.20% of the strawberry exports value and the price/ ton was USD 1.56 thousand on average through the study period.

c) United Kingdom Market: United Kingdom imported about 13.22% of strawberries from Egypt. The price/ ton was the highest price

between EU countries (USD 6.68 thousand) on average through the study period.

d) Netherlands Market: Netherlands market imports about 9.53% of the Egyptian strawberries, the price/ ton was 1.46 thousand \$ as average through the study period.

e) France Market: France market imports about 7.06% of the Egyptian strawberries with about 7.66% of the strawberry exports value and the price/ ton being 2.67 thousand \$ as average through the study period.

Artichokes

Table 10 shows data from CAPMAS indicating that the Italian market is the largest importer of Egyptian artichokes in the EU, along with several countries such as the Netherlands, France, Belgium, Germany, United Kingdom and Greece. Italy imports represent about 98.07% of the artichoke exports of the exportation value of artichoke to the EU, and the price/ ton was USD 1.15 thousand as average through the period 2015-2019.

TABLE (8): STRAWBERRY EXPORTS QUANTITIES IN THOUSAND TONS TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Germany		Belgium		United Kingdom		Netherlands		France		Total Exports to EU
	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	Exports Quantity	%	
2015	2.98	36.58	1.51	18.60	1.20	14.73	1.04	12.79	0.91	11.21	8.14
2016	15.42	32.43	17.68	37.19	5.97	12.55	2.91	6.12	3.22	6.77	47.55
2017	4.23	36.41	3.75	32.24	1.33	11.44	0.84	7.19	0.54	4.69	11.62
2018	5.41	32.37	4.32	25.83	2.39	14.29	2.60	15.58	0.83	4.98	16.71
2019	3.86	31.90	4.89	32.15	2.48	13.36	1.58	8.97	4.39	9.90	18.19
Average	31.90	33.87	32.15	28.42	13.36	13.22	8.97	9.53	9.90	7.06	102.21

Source: CAPMAS, Foreign trade data, Unpublished data.

TABLE (9): STRAWBERRY EXPORTS VALUES IN MILLION \$ TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019.

Year	Germany		Belgium		United Kingdom		Netherlands		France		Total Exports to EU
	Exports value	%	Exports value	%	Exports value	%	Exports value	%	Exports value	%	Exports value
2015	9.85	34.58	5.03	17.65	6.02	21.12	2.54	8.93	3.04	10.65	28.49
2016	15.69	32.52	6.13	12.70	18.15	37.61	3.30	11.60	2.96	6.14	48.26
2017	12.44	34.39	4.16	11.50	13.85	38.30	1.73	6.06	1.98	5.47	36.17
2018	14.31	31.48	6.94	15.26	16.47	36.23	2.01	7.07	3.72	8.17	45.47
2019	12.57	26.64	6.92	14.67	19.97	42.34	1.43	5.03	4.26	9.03	47.18
Average	12.97	31.78	5.83	14.20	14.89	34.18	2.20	7.41	3.19	7.66	41.11

Source: CAPMAS, Foreign trade data, Unpublished data

TABLE (10): ARTICHOKE EXPORTS TO THE MAIN EU COUNTRIES THROUGH PERIOD 2015-2019

Year	Exports Quantities (Thousand tons)			Exports Value (Million \$)			Export price/ ton (Thousand \$)	
	Total Exports to the EU	Exports to Italy Market	%	Total Exports to EU	Exports to Italy Market	%	Total Exports to EU	Exports to Italy Market
2015	1.54	1.49	96.77	1.90	1.79	94.24	1.23	1.20
2016	2.75	2.70	98.32	3.22	3.18	98.85	1.17	1.18
2017	3.73	3.72	99.65	4.14	4.14	99.90	1.11	1.11
2018	2.64	2.59	97.95	3.08	3.04	98.48	1.17	1.17
2019	9.19	8.97	97.68	10.31	10.05	97.49	1.12	1.12
Average	3.97	3.89	98.07	4.53	4.44	97.77	1.16	1.15

Source: CAPMAS, Foreign trade data, Unpublished data

SECTION 3

Egypt's Quality Infrastructure System (QIS) for Agricultural Exports

According to the United Nations Industrial Development Organisation (UNIDO): “Quality” means ensuring that products and services meet the requirements of the customers (and) are fit for purpose’.⁵¹ Based on this understanding, UNIDO defines “Quality Infrastructure” as ‘the system contributing to governmental policy objectives in areas including industrial development, trade competitiveness in global markets, efficient use of natural and human resources, food safety, health, the environment and climate change. (...) Quality Infrastructure System covers essential aspects such as policy, institutions, service providers, and the value-adding use of international standards and conformity assessment procedures’⁵².

This section provides an in-depth exploration of the existing regulations and standards that dictate SPS related measures and policies. It will then delimit the institutional framework governing the QIS ensuring SPS requirements and export marketing requirements are being met by Egyptian farmers and exporters.

3.1 Egypt's SPS-related and marketing quality requirements regulatory framework

National Laws and Decrees

Several laws and decrees have been adopted by authorities in Egypt to govern SPS requirements and ensure food safety measures are applied across the value and supply chain stages from production to local market use and export. These are also regularly reviewed and updated to meet new marketing requirements.

The following list outlines key Egyptian laws and decrees setting SPS measures enforcement as well as control and quality assurance mechanisms in Egypt especially concerning agricultural and food products:

- Agricultural Law 53/1996;
- Ministerial Declaration No. 3007/2001 of the Ministry of Agriculture and Land Reclamation (MALR) defines export procedures for the export of plants and agricultural products.
- Pharmaceutical Law 14/1984;
- Ministerial Decree 583/2007 instituted a process for coordinating the work of Egypt's SPS bodies and the flow of information between them;
- Prime Ministerial Decree 2489/2007 created a mechanism to ensure

⁵¹ https://www.unido.org/sites/default/files/2016-05/UNIDO_Quality_system_0.pdf

⁵² Ibid.

consistency of standards between the various SPS bodies;

- Ministerial Decree No. 757/2010 of the Ministry of Trade and Industry (MOTI) requires all food and beverage processors to apply Egyptian Standard (ES) No. 4884/2008. This standard requires Hazard Analysis and Critical Control Points (HACCP) or International Organisation for Standardization (ISO) 22000, as from January 2011;
- Ministerial Decree No. 646/2016 grants plant protection to some plant varieties;
- Law No. 1 of 2017 enacted by the Egyptian parliament establishes the National Food and Safety Authority (NFSA) whose mandate is to undertake the functions assigned to ministries; public organizations; government bodies... etc. in respect of control of food handling. However, until NFSA is fully operational, the original concerned body will proceed with its functions as normal.
- Law No 15/2017 and Law No 95/2018 requires that all processors should be inspected before their operation and granted industrial licences by the Ministry of Industry (Industrial Development Authority).
- Ministerial Decree 670/2017 sets out the systems applicable to the inspection and monitoring of Egyptian fresh fruits and vegetables in farms being prepared for exportation. The Decree also mandates farms to obtain a certificate of Good

Agricultural Practices (GAP) before being officially inspected. Then farmers are required to apply for approval to the Agriculture Export Council (AEC) and the Central Administration of Plant Quarantine (CAPQ) to receive a code (F code). The code is only granted if the farmer complies *inter alia* with reducing microbiological risks by for instance ensuring the availability of field toilets and handwashing facilities. The code is valid for one year and it also indicates the quantity the farm could produce. Also, packhouses and exporters are required to be inspected and certified by private bodies for Good Hygiene Practice (GHP) and Good Manufacturing Principles (GMP) systems⁵³. A summary of the mechanism of the decision's implementation is outlined in Box 1 below and the relevant control authorities will be tackled in section III B.

- Ministerial Decree 974/2017 on Agricultural Pesticides Registration and Handling. According to a recent report by the United States Department SDA in 2020: 'article (29) establishes pesticide maximum residue levels according to Codex, the EU, or the U.S. Environment Protection Agency reference levels. Priority reference is given to Codex, followed by the EU, and then the U.S. standard. In case the pesticide has no established maximum residue level for a certain crop, an MRL will be derived from that allocated for the closest, similar crop'⁵⁴.

⁵³ https://ec.europa.eu/food/audits-analysis/act_getPDF.cfm?PDF_ID=14389
⁵⁴ <https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Food%20and%20Agricultural%20I>

mport%20Regulations%20and%20Standards%20Country%20Report_Cairo_Egypt_12-31-2019

Box 1. Mechanism of implementation of Joint Ministerial Decision No. 670 of 2017 on specific conditions that must be met on the farm

- The farms /Packing stations/ assembly centers apply to the Agricultural Export Council for registration and accreditation.
- A committee composed of Egyptian Plant Quarantine (EPC) and the Horticultural Export Improvement Association (HEIA) and the Agricultural Export Council will be established to examine these farms, stations and assembly centers and ensure that the required requirements are met. The committee shall:
 - Provide a specific code for each farm that is approved.
 - Provide a specific code for each packing station or assembly center that is approved.
 - The exporting company is obliged to place the farm code and packing station code on the exported box.
 - The control bodies (Egyptian Quarantine- General Organization for Export & Import Control) are notified of a list of farms, packing stations, approved assembly centers and their codes; for not allowing export from outside these codes.
 - Make sure that the codes are placed on packaging, agricultural certificate and certificate of origin.
 - The areas cultivated in each farm, the quantity of production and the quantity that is suitable for export are determined, so that export from the farm is allowed only within the quantity previously identified and the Egyptian Agricultural quarantine is carried out by the factoring, and in the case of the end of the farm's quantities, the code will be closed.

Source: AEC website, at: <https://www.aeegypt.com/WebPages/Common/ContentPage.aspx?CID=229>

- **Prime Ministerial Resolution No. 412/2019** promulgating the Executive Regulation of Law No.1 of 2017 establishing the NFSA. It outlines its powers as well as the compliance requirements that should be observed and followed by food facilities.
- **Ministerial Decree No. 562/2019**, is the latest governing plant imports and exports quarantine procedures for agricultural products.

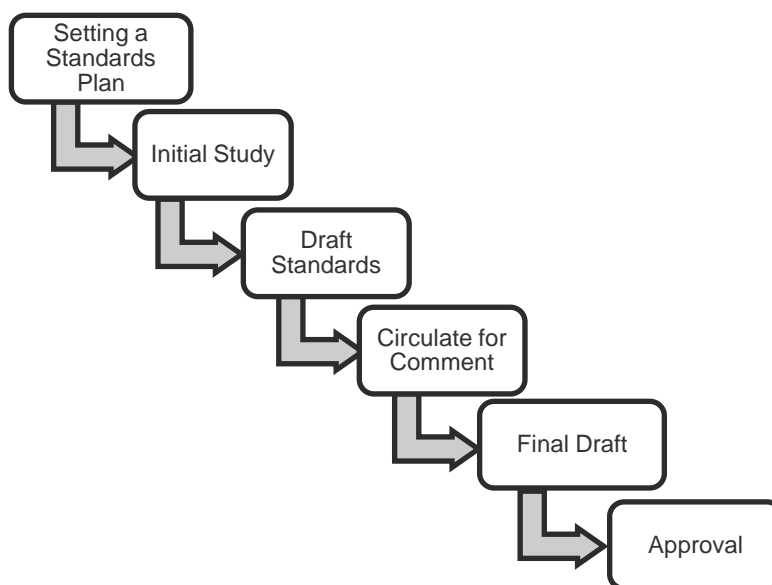
Egyptian Standards (ES) and Metrology developed by the Egyptian Organization for Standardization (EOS)

Standardization in Egypt goes back to the establishment of the Egyptian Organization for Standardization and Quality (EOS) affiliated with MOIT back in 1957. According to EOS, the organisation has issued more than 10.000 Egyptian standards covering different fields: food products, chemical products and construction materials and refractories, textile products, engineering products, communications and medical equipment, metrology⁵⁵ and measurement methods etc⁵⁶. Figure 1 below illustrates the steps followed to develop ES and adopt them.

⁵⁵ Metrology is the science of measurement. Exchange of any product or service between individuals or countries is usually measured and is required for efficiency and record keeping.

⁵⁶ <http://www.eos.org.eg/en/page/24>

FIGURE 1: STEPS OF DEVELOPING EGYPTIAN STANDARDS



Source: ITC, 2017

Regarding agri-food products, it was worth noting that the EOS chairs the Egyptian Codex Committee formed in 1973 following the accession of Egypt to the International Committee

of CODEX ALIMENTARIUS⁵⁷ in 1972. Table 11 below, lists key CODEX ALIMENTARIUS international food standards, guidelines and codes of practice.

TABLE 11: KEY CODEX ALIMENTARIUS INTERNATIONAL FOOD STANDARDS, GUIDELINES AND CODES

Reference number	Title	Description
CAC/GL 25-1997	Guidelines for the exchange of information between countries on rejections of imported food (CAC/GL 25-1997).	http://www.codexalimentarius.net/web/standard_list.jsp
CAC/GL 26-1997	Guidelines on the design, operation, assessment and accreditation of food import and export inspection and certification systems (CAC/GL 26-1997).	http://www.codexalimentarius.net/web/standard_list.jsp
CAC/GL 50 -2004	General Guidelines on Sampling (CAC/GL 50 -2004).	http://www.codexalimentarius.net/web/standard_list.jsp

⁵⁷ affiliated to the Food and Agriculture Organization of the United Nations (FAO) and the World Health Organization (WHO).

CAC/RCP 53-2003	Code of hygienic practice for fresh fruits and vegetables (CAC/RCP 53-2003).	http://www.codexalimentarius.net/web/standard_list.jsp
CAC/RCP 1-1969	General principles of food hygiene (CAC/RCP 1-1969).	http://www.codexalimentarius.net/web/standard_list.jsp

Source: European Commission, 2019. Available at: https://ec.europa.eu/food/audits-analysis/act_getPDF.cfm?PDF_ID=14389

Exporters of Agri-food products in Egypt have to comply with a number of Egyptian standards (ES). Table 12 below enlists some of the key general standards, like: standard hygiene practices (ES No. 3856/2006) and Food safety management and systems (ES No. 4884/2008). It is worth mentioning that a recent report by the

United States Department of Agriculture (USDA) on the 5th of January 2020 acknowledges that: 'Nearly 80 per cent of Egypt's mandatory standards are based on standards issued by international organizations'⁵⁸. Exporters have to comply with the following key general standards:

TABLE (12): KEY EGYPTIAN STANDARDS (ES) FOR AGRI-FOOD PRODUCTION AND SUPPLY CHAINS

Standard	Description
ES 3778/2005	Hazard Analysis Critical Control Point System and guidelines for its application (HACCP)
ES 3856/2006	Recommended Egyptian code of practice – general principles of food hygiene
ES 3857/2005 Codex 30/1999	Principles and guidelines of microbiological risk assessment
ES 4884/2008 ISO 22000:2005	Food safety management systems – Requirements for any organization in the food chain
ES 3951/2008	Requirements for packaging fresh fruits
ES 6206-1/2007	Methods of analysis and testing – Part 1: Physical analysis – Determination of net and drained weight, viscosity – Headspace – Entrance matter and damaged fruits
CAC/GL 21-1997	Micro criteria for foods
CAC/RCP 57- 2004	Code of hygienic practice
ES 7136/2010	Maximum levels of certain contaminants in foodstuff
ES 745/2008	Corrugated board boxes
ES 1546/2011 Codex 1/ 1985	Labelling of pre-packaged food products
ES 2613 – 1/2008	Durability periods for food products – Part 1: General requirements
ES 2613 – 2/2008	Durability periods for food products – Part 2: Shelf life

⁵⁸http://agriexchange.apeda.gov.in/IR_Standards/Import_Regulation/FoodandAgriculturalImportRegulationsandStandardsCountryReportCairoEgypt12312019.pdf

Codex Standard 234 – 1999	The recommended method of analysis and sampling – Part 1
ES 3120/2008 CAC/GL2 – 1985	Guidelines on nutrition labelling
ES 4245/2008	Determination method of printing ink resistance to removal from food packaging labels
ES 6050/2007	General requirements for packaging and wrapping
ES 3393/2005	Hygienic requirements for food products establishment

Source: Extract from ISO, 2012. Available at: <https://www.iso.org/files/live/sites/isoorg/files/archive/pdf/en/pub100311.pdf>

3.2 Egypt's QIS Institutional framework for agricultural exports

According to UNIDO: 'key institutional components in the QIS are made up of the high-level institutions responsible for standardization, metrology, conformity assessment and accreditation'⁵⁹. It is important to highlight that Egypt's agriculture and food safety QIS is in transition since the creation of the National Food Safety Authority (NFSA) in 2017 which is gradually assuming roles and functions undertaken by ministries and other public establishments when it comes to food safety from the farm gate (post-harvest) to the end consumer. NFSA will become 'the sole agency regulating the food industry for domestic and export markets in Egypt'⁶⁰.

Once NFSA is fully operational, a new distribution of post-harvest control authorities and functions will be issued. A report issued by USDA in 2019

states that the NFSA 'will remake the country's regulatory framework for food safety:'⁶¹.

The National Food Safety Authority (NFSA):

Based on the FAOLEX database⁶², the National Food Safety Authority (NFSA) was established in January 2017 following the approval of Law No. 1/2017 by the Egyptian Parliament. It is set as an independent agency chaired directly by the Prime Minister (PM) and operating through a Board of Directors enjoying political powers⁶³. The mandate of the NFSA is to solely fulfil the requirements of food safety to preserve human health and safety, through setting regulations and standards, but also through inspection, licensing and certification⁶⁴. The key objective behind establishing NFSA is to consolidate Egypt's Food Safety System from the farm-gate to the end consumer.

In this respect, NFSA has been granted the following powers as per the Prime Minister Resolution No. 412/2019⁶⁵:

Risk Analysis

⁵⁹ https://www.unido.org/sites/default/files/2016-05/UNIDO_Quality_system_0.pdf

⁶⁰ <https://www.amcham.org.eg/publications/egypt-business-climate/issue/2/LEGISLATIVE-REFORMS>

⁶¹ https://apps.fas.usda.gov/newgainapi/api/report/downloadreportbyfilename?filename=Egypt%20Establishment%20of%20the%20National%20Food%20Safety%20Authority_Cairo_Egypt_9-2-2019.pdf

⁶² FAOLEX is FAO's database of national legislation, policies and bilateral agreements on food, agriculture and natural resources management.

⁶³ <http://www.fao.org/faolex/results/details/fr/c/LEX-FAOC165614/>

⁶⁴ [https://www.nfsa.gov.eg/Images/App_PP/DeskTop/App_Web/1/MyWebMedia/PDF/elqareda-FSA%20Law%20\(English\)_6%20Dec.2017.pdf](https://www.nfsa.gov.eg/Images/App_PP/DeskTop/App_Web/1/MyWebMedia/PDF/elqareda-FSA%20Law%20(English)_6%20Dec.2017.pdf)

⁶⁵ https://members.wto.org/crnattachments/2019/SPS/EGY/19_2322_00_e.pdf

Article 4. Stipulates that 'NFSA shall establish the procedures required for the implementation of risk analysis system in order to provide a high level of protection of human life and health'.

Traceability

As per Article 5: 'NFSA shall develop a food traceability system that clarifies the obligations of all parties at all stages of production, processing, manufacture, packaging and handling until a product reaches a consumer'.

Labelling of Foodstuffs

Article 6 mandates NFSA to 'establish rules and procedures for the labelling of foodstuffs and no labelling, advertising or presentation of foodstuffs, including shape, appearance, packaging or the packaging materials used, the manner in which such foodstuffs are arranged, the setting in which they are displayed and the information which is made available thereon through whatever medium, may mislead or deceive consumers'.

Scientific Studies

'NFSA shall take actions necessary to collect, collate, analyze and summarize the scientific and technical data relevant to competence thereof and shall create a database that shall involve in particular the collection of data relating to: (a) food consumption and exposure of individuals to risks related to consumption, (b) incidence and prevalence of biological hazards, (c) contaminants in food, (d) residues and (e) determination of licensed and unlicensed food businesses.' (Article, 7).

Official Controls

As per Article 8, NFSA shall perform the following actions:

- verifying compliance of food businesses with the provisions of the law and food safety related legislation and performing official controls to ensure that the relevant requirements of such legislation are

fulfilled by FBOs at all stages of food handling;

- developing and applying a system of official controls to food businesses, use and storage of food as well as any process, material, substance or activity related to food, including activities related to transporting food and any activities required to attain the objectives as set forth in the law and food safety related legislation in addition to surveillance systems for food safety and other means of monitoring that cover all stages of food handling;
- undertaking official control tasks in general using appropriate methods and techniques such as monitoring, surveillance, verification, audit, inspection, product traceability, sampling, sample analysis and other methods and techniques of official controls and NFSA has the right to document non-compliance cases using all appropriate techniques and methods such as taking photographs.

Issue Food Handling License

According to Article 12: 'Food businesses shall, prior to product handling, obtain a food-handling license from NFSA in accordance with requirements, including the fees payable, approved by NFSA/(Board of Directors) BOD in this regard'. With regard to Food businesses existing at the time of the enforcement of the present Executive Regulations, the article provides that they 'shall submit an application for regularization of status to NFSA in accordance with the rules and procedures approved by NFSA/BOD'.

Solely control Export and Import

- Visual Inspections and documentary checks on imported and exported food: article. 15 stipulates that: 'NFSA shall

solely control and conduct visual inspection and documentary checks on the imported and exported food and shall take food samples in order to be examined and analyzed in accredited laboratories. The article adds that: 'The Egyptian Customs Authority (ECA) shall approve the decisions taken by NFSA...'

- Sampling: 'NFSA shall establish the rules governing sampling and examination of samples taken from the consignments of imported and exported food, including visual inspection procedures and the analyses required to be conducted in the accredited laboratories contracted with by NFSA in light of potential risks' (Article 16.)

It is worth highlighting that according to a recent report of an audit carried out in Egypt from 28 January 2019 to 07 February 2019 in order to evaluate the systems in place to control microbiological contamination in food of non-animal origin intended for export to the EU, two official laboratories in Egypt were identified as involved in the control of microbiological contamination for exports to the European Union. These are; the Central Laboratory of Residue Analysis of Pesticides and Heavy Metals in Food (QCAP) under MALR and the Central Public Health Laboratories CPHL which is one of 50 laboratories under MOHP66.

- Issue Certificates of Compliance (CoC): As per Article 17 'NFSA shall establish the requirements and rules governing the issuance of COC required to export the locally produced product. NFSA shall also have sole competence to issue such certificate in accordance with the rules established by NFSA/BOD in this regard'.

Important Note: Plant and animal health as well as on farm requirements are outside NFSA's mandate and continue to be handled by the competent authorities of the plant quarantine and veterinary quarantine at the Ministry of Agriculture and Land Reclamation. Accordingly, NFSA 'shall accept the certificates issued (by the competent authorities) in respect of plant and animal health respectively' (Article 17).

Egypt's Plant Health System - MALR's Central Administration for Plant Quarantine (CAPQ)

The Central Administration of Plant Quarantine (CAPQ), also known for Egyptian Plant Quarantine (EPQ) serves as Egypt's national contact point of the International Plant Protection Convention (IPPC). It is responsible for the administration of plant health regulations and control in Egypt.

According to a presentation of Dr.Ahmed Kamal EL-Attar Head of CAPQ dated in 2018, the role of CAPQ corresponds to what is outlined in article IV of the IPPC:

- **Issuance of Phytosanitary Certificates:** 'the issuance of certificates relating to the phytosanitary regulations of the importing contracting party for consignments of plants, plant products and other regulated articles;
- **Surveillance of growing plants,** including both areas under cultivation (inter alia fields, plantations, nurseries, gardens, greenhouses and laboratories) and wild flora, and of plants and plant products in storage or in transportation, particularly with the object of reporting the occurrence, outbreak and spread of pests,

⁶⁶ https://ec.europa.eu/food/audits-analysis/act_getPDF.cfm?PDF_ID=14389

and of controlling those pests, including the reporting referred to under Article VIII paragraph 1(a);

- **Inspection of consignments of plants and plant products** moving in international traffic and, where appropriate, the inspection of other regulated articles, particularly with the object of preventing the introduction and/or spread of pests;
- **Disinfestation or disinfection of consignments of plants, plant products** and other regulated articles moving in international traffic, to meet phytosanitary requirements;
- **Protection of endangered areas** and the designation, maintenance and surveillance of pest free areas and areas of low pest prevalence; and
- **Pest risk analyses**⁶⁷.

With regard to export control, based on ITC (2017), CAPQ also undertakes the following:

- **'Inspection of plant products** applied in the preparation and packing stations of exporters; plants/plant products prepared for export inspected according to the Import country's legislation;
- **Issues Phytosanitary Certificates**
- **Certifies packaging and preparation station:** Clean packages, in conformity with the appropriate standards; and air shipments inspected in the commodity village in the international airports⁶⁸.

Important Note: A packinghouse that wishes to export agri-food products should be registered with both agencies: EPQ and, NFSA.

Other Authorities involved in Agricultural exports

The following entities affiliated to MOTI are also concerned with ensuring Agricultural exports meet quality requirements ⁶⁹:

The Agricultural Export Council (AEC)

'It is the supreme counsellor entity to the MOTI for the Agriculture Sector. It acts as the official representative of the agricultural export sector in Egypt⁷⁰. Its mandate is to develop and promote this sector in consultation with governmental and non-governmental bodies and in coordination with MOTI and the MALR the Council's recent efforts to organize work in this important sector culminated in the issuance of the joint Ministerial Decree No 670/2017 that defines the system of inspection and monitoring of Egyptian fresh fruits and vegetable export requirements to be applied in the farm⁷¹.

The General Organization of Export and Import Control (GOEIC)

'Decree 770 (2005) centralized the process for inspection and certification of food items under the General Organization for Export and Import Control. Additionally, the GOEIC became the sole authority responsible for processing customs documents, as well as issuing the results of inspections through a certificate of conformity⁷²

⁶⁷ <http://www.medagri.org/docs/group/90/CAPQ.pdf>

⁶⁸ ITC, 2017.

⁶⁹https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Food%20and%20Agricultural%20Import%20Regulations%20and%20Standards%20Country%20Report_Cairo_Egypt_12-31-2019

⁷⁰ <https://www.aegegypt.com/WebPages/Common/ContentPage.aspx?CName=AboutUs>

⁷¹

<https://www.aegegypt.com/WebPages/Common/ContentPage.aspx?CID=229>

⁷²https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Food%20and%20Agricultural%20Import%20Regulations%20and%20Standards%20Country%20Report_Cairo_Egypt_12-31-2019

FIGURE 3 BELOW SUMMARISES THE EXPORT QUARANTINE PROCEDURES TO BE UNDERTAKEN BY THE EXPORTER AND THE KEY REQUIRED DOCUMENTS AT EVERY STEP.

Step 1: Exporters submit an Inspection



- Visit the nearest Agricultural Quarantine Office
- Fill out all details of the relevant form
- Pay fees: 500 LE per crop/season
- Register in the special record

Step 2: Required Documents



- Proof of Identity
- Record of Exporters
- Payment voucher for assessed costs

Step 3: Inspection



- Agriculture Quarantine Inspectors and NFSA examine the shipment according to the requirements of the importing country
- The examination occurs in production areas or packing and processing stations

Step 4: Authorization



- If consignment conforms with the export conditions, it is authorized to export.
- *If the consignment is non-complied, then the export is refused*

Step 5: Certificate and Next Steps



- If all conditions are met, SPS certificate is issued for the authorized consignment
- Needs to be exported within seven days after the day of the examination

Step 6: Documents



- Submit stamped copy of the shipping agency
- **OR** a copy of the approved compass, stamped by customs

Note



- If the exporter wishes to change the country of export, it is possible but requires notifying the Agricultural Quarantine Office long before the shipment.
- An alternative to the SPS certificate can be issued in case of damage, change of address or importing country, entry critics or any change or error in the data for the original certificate.

Key points to remember



- The exporter must follow the complete procedure of obtaining the health and phytosanitary certificate; forgery might result in bearing legal consequences
- Only provide the officially correct data
- A request to the Agricultural Quarantine Office for replacing or issuing a lost replacement for the certificate can be registered with an accompanying explanation for the same

Source: Author, based on AEC

Delimiting NFSA's new mandate vis à vis pre-existing competent authorities

It is important to emphasise that NFSA is mandated to fulfil food safety requirements for domestic production, import and export from the farm-gate to the end consumer only. In other words, it does not regulate farmers or issues of plant and animal health⁷³. The MALR's CAPQ continues to carry out its mandate regarding plant health.

However, a packinghouse that wishes to export should be registered with both agencies: Egyptian plant quarantine and, NFSA and comply with the importing country requirements⁷⁴.

The USDA 2019 report attempted to further explain the limit between the role of NFSA and CAPQ/EPQ when exporting agricultural products, by giving the following example: 'In the circumstances that a single consignment requires two different certifications including food safety, the NFSA will coordinate with the relevant agency. For example, phytosanitary certificates required for the export of plants or plant products will be issued from the competent authority, which is the Egyptian Plant Quarantine. However, if a pesticide residues certificate⁷⁵ is required by the importing country the NFSA will be responsible for verification and certification of the consignment⁷⁶.

⁷³https://apps.fas.usda.gov/newgainapi/api/report/downloadreportbyfilename?filename=Egypt%20Establishment%20of%20the%20National%20Food%20Safety%20Authority_Cairo_Egypt_9-2-2019.pdf

⁷⁴Ibid

⁷⁵ Under the existing QS The Central Public Health Labs, the Central Laboratory for Pesticides, and the Central Laboratory of

Residue Analysis of Pesticides and Heavy Metals in Food are responsible for examining and testing pesticide MRLs in fresh fruit and produce, and for ensuring that MRLs do not exceed acceptable limits.

⁷⁶Ibid

Conclusion

SMEs in the agriculture sector, particularly in the fruit sector have potential to leverage the EU market for lucrative returns, if the challenges associated with SPS measures and standards conformity are addressed. The manual prepared along with this study delves more into the steps necessary for SMEs to better understand and conform with such requirements.

Egypt has made progress in developing and enhancing its quality control and certification infrastructure particularly when it comes to food safety measures. 'Before the establishment of the NFSA, Egypt lacked a unified regulatory authority to supervise food safety. More than 15 different government agencies regulated food safety, in a patchwork system that often created overlapping regulation or critical gaps in consumer protection. It has in place a project for adopting a national quality strategy through which new institutions have been created'⁷⁷.

The NFSA has been taking steps to harmonize the food safety regulations and seizing its full authorities and obligations since the issuance of the PM Decree 412 for the year 2019. This process is pursued 'by means of signing protocols with national regulatory bodies. To date, the NFSA has signed protocols with the Egyptian Organization for Standardization, the Central Administration of Plant Quarantine, the Horticultural Export Improvement Association (HEIA), General Organization for Export and Import Control, and the Port Said Chamber of Trade. The protocols specify the means of cooperation and mechanisms that allow each organization to implement its scope of work. They

also specify the means for licensing and issuing certificates according to the organization's mandate.'⁷⁸.

With a new Food Safety system being applied, capacity building, technical assistance and dissemination of awareness and information remain a critical need for firms to be able to acquire the necessary knowledge about new processes and the technical competence of conforming with SPS and food safety related measures.

⁷⁷<https://apps.fas.usda.gov/newgainapi/api/report/downloadreportbyfilename?filename=Egypt%20Establishment%20of%20the>

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