

Labeling of Foodstuff in Dubai

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The government of Dubai has assigned the duty of allowing the importation of foodstuff, and monitoring the labeling and testing of the products, to Dubai Municipality (DM) at the first instance while DM liaises with the Emirates Authority for Standardization and Metrology (ESMA) in relation of the adopted relevant standardization in the UAE. In this article we will shed a light on the labelling information which food companies need to know.

The consignee of foodstuff products should, in the first place, be registered at DM as an authorized foodstuff consignee through its electronic system, which is called the 'Food Import and Re-Export System (FIRS program)'. The consignee should be a registered local company in the UAE trading under food trading activity or general trading activity.

The consignee should process the importation approval through the FIRS program before importing the products or shipping the same to the UAE. The following is a list of the procedures that need to be followed:

Registration of the Packaging Barcode

DM requires that each foodstuff package have a barcode and all packages of the same product should have identical barcodes, as the registered barcode can be used for multiple consignments and each product should receive only one unique barcode.

Laboratory Test

FIRS program requires that all registered foodstuff products are tested by a laboratory. DM refers samples of the substances in question to Dubai Central Laboratory at the first instance, and if the lab cannot test the product then they refer it to an accredited lab in the UAE. If the UAE lab cannot conduct the required test then DM may request that the applicant conduct the test at a specific accredited lab abroad.

Registration for Foodstuff and Label Assessment

Foodstuff products which are new to the FIRS program should be registered through this program. This requires a description of the packaging type (carton containers or plastic or metal etc.) and a clear image of the label and the food item itself (the size of the image should not exceed 10 MB). The labeling information should be present on the wrapper as a minimum requirement. The following labeling information should be considered for all foodstuff products:

- Details of the foodstuff products in question
 - Commercial Name/brand name of the foodstuff: The name shall be specific and not generic, and shall indicate the true nature of the foodstuff.
 - Production & expiration dates: foodstuff products with a shelf-life not exceeding 18 months shall carry the date of minimum durability using words such as "will keep at least until".
 - Ingredients to be arranged in a descending order according to the weight or volume.
 - Highlight any ingredients which may cause hypersensitivity.
- Instructions on storage and use.
- The net weight of the contents.
- Manufacturer Name and address:
- The name and address of the manufacturer or the packer can be declared in case the packer is not the

same as the manufacturer. Only one name and address is required as a minimum requirement.

- Country of origin:
- EU is not a country of origin and the exact country should be specified.
- Lot identification: Each pack/container shall be marked in code or in a clear way to identify the producing factory and the lot.
- Product's barcode number.
- The nutritional information. The authorities in the UAE require the amounts of nutrients present on the label (the nutritional information and the net content) as percentage by weight only or by amount of food serving.

The following sample chart represents the best practice of listing the amounts of nutrients and we have included fat, sodium and protein as examples for nutrition facts:

Nutrition Facts **Percentage (%)** **تغذوية معلومات**

Fat	0%	دهون
Sodium	7%	صوديوم
Protein	1%	بروتين

Nutrition Facts **Amount (g)** **تغذوية معلومات**

Fat	0 g	دهون
Sodium	7 g	صوديوم
Protein	1.1 g	بروتين

- Halal marking

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- Genetically modified (GMO) products should be marked as (Genetically modified + the name of the product) or (product from genetically modified + the name of the product) while those products which contain GMO should be marked as (contain genetically modified + the name of the product).

General Mandatory Labelling Information

The labels for packed foodstuff products should be clear, easy to read and difficult to remove in the normal conditions of handling and use. Information should not be obscured by designs or by other written, printed or graphic matter and shall be on contrasting ground to that of the background. The letters of the name of the products shall be in a size reasonably related to other prominent printed matter on the label.

Where the container is covered by a wrapper, the wrapper must carry the necessary information, or the label on the container shall be readily legible through the outer wrapper or not obscured by it. In general the name and net contents of the foodstuff products must appear on that portion of the label normally intended to be presented to the consumer at the time of sale.

Labelling Language

Arabic is the official language for verifying the information on the label. Other languages on the label are considered as translation. The language used on packaging labels of foodstuff must be in Arabic and/or English.

When the labelling information includes details other than the mandatory information, the label should include in Arabic at least the mandatory information.

Companies may use stickers to translate the food labels into the Arabic Language. It is admissible that the labeling information on the wrapper is given in all languages, save for Hebrew due to the commercial boycott to Israel.

Possible Reasons for Rejection

The FIRS program may reject the registration of foodstuff products for the following common reasons:

- Banned ingredients such as poppy seeds and alcohol
- Difficult to read the label information
- Duplicated barcodes in the FIRS program
- Ingredients are not declared
- Ingredients in foreign language neither Arabic nor English
- Non conformity with applicable laws, such having religious signs or inappropriate pictures.

In conclusion, producers of foodstuff products should keep in mind the requirements of the FIRS program at Dubai Municipality. Most importantly they should remember that only a registered local company in the UAE trading under food trading activity or general trading activity can be a legitimate importer of foodstuff products into Dubai. Foodstuff products should comply with the general rules of standard GSO 9/2019 for labeling pre-packaged foodstuff, in addition to other complementary standards such as Halal standards and the GMO standards.