SFA Export Library Market Reports on Food Import Regulations and Standards

Country of Origin	Singapore (SG)
Country of Destination	European Union (EU) – EU countries are Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden
Food Product Category	Composite Products
Product Code	CN Codes: 1517, 1518, 1601 00, 1602, 1603 00, 1604, 1605, 1702, 1704, 1806, 1901, 1902, 1904, 1905, 2001, 2004, 2005, 2101, 2103, 2104, 2105 00, 2106, 2202, 2208

The information in this document has been compiled and provided by the Singapore Food Agency (SFA). SFA emphasises that importers and exporters have the responsibility to find out the import requirements of destination countries/regions/markets. Exporters are advised to confirm with their importers on the import requirements and eligibility of their product before exporting.

SN	Sub-header	Details
1	**Product eligibility / ineligibility**	Processed composite products – foodstuffs containing both products of plant origin and processed products of animal origin – are eligible for export from Singapore to the EU. For example, based on Import of Composite Products into the EU, salted egg potato chips is considered a shelf-stable composite product. The eggs and eggs products used in the manufacture of salted egg potato chips for exports to the EU must be sourced from approved establishments in EU Member States or eligible non-EU countries. For example, composite products containing bivalve molluscs and/or are derived from bivalve molluscs – where such molluscs originate from EU Member States or eligible third countries approved by the EU – can be exported to the EU.
2	**Importing country authority**	The European Council, the Council of the European Union, the European Parliament, and the European Commission are main institutions involved in developing policies and passing legislation that applies throughout the EU. The European Council defines the EU's overall political direction and priorities. It is not one of the EU's

		legislating institutions. The main priority of the Council of the European Union is to pass legislation based on proposals presented by the European Commission, in most cases jointly with the European Parliament. The European Parliament is to pass EU laws, together with the Council of the European Union, based on European Commission proposals. The European Commission is the sole EU institution tabling laws for adoption by the Parliament and the Council, and monitors the Member States' application and implementation of EU legislation. As an independent department, the EU Food Safety Authority (EFSA) mainly provides scientific opinions and suggestions on food safety to the European Commission. DG SANTE is the department in the European Commission (EC) responsible for EU policy on food safety and health laws within the EU. It is mainly responsible for drafting relevant laws and regulations in the field of food safety, cooperating with member states to ensure EU food safety, supervising the implementation of laws and regulations of member state, and being responsible for fast early warning of food safety risks and handling of emergencies, etc. The border control post under the DG SANTE inspects food products entering the EU.
3	**Pre-export approvals by the importing country**	**Products** Regulation (EC) No 853/2004 lays down specific rules on the hygiene of food of animal origin for food business operators. In particular, Article 6(4) states that the processed products of animal origin contained in the composite product must be produced in EU-approved establishments located either in EU Member States or in third countries authorised for the entry into the European Union of those processed products of animal origin. - The third countries must be listed in Regulation (EU) 2021/404 or Regulation (EU) 2021/405. - The conditions of the raw material used must also satisfy Regulation (EU) 2017/625 and Annex to Regulation (EU) 2022/2293. - Regulation (EU) 2024/334 amends Regulation (EU) 2021/405 regarding approval status of some third countries. Singapore is not affected. **Establishments** Establishments in third countries which are manufacturing composite products should be registered by the responsible competent authority. These establishments do not need to be approved by the EU. However, the establishments processing the products of animal origin must be EU-approved. If such

		establishments are also manufacturing composite products, these establishments must again be EU-approved. The list of approved third country establishments can be viewed here. **Importers** Importers should be aware of the inspection measures carried out by authorities at the place of destination. Regulations (EU) 2023/2652 (regarding private attestations for exemption) and Regulations (EU) 2023/1674 (for exemption) amend Regulation (EU) 2021/630 which establishes rules concerning conditions under which composite products of lower risk as listed to be exempted from official controls at the border control post. In particular, Article 4 states the places where official controls shall be performed. Regulation (EU) 2021/632 establishes the lists of animals, products of animal origin, germinal products, animal by-products and derived products, and composite products that are subject to official controls at border control posts. The qualifications of the official control of various products are listed in the Annex. Regulation (EU) 2019/2129 lays down rules for the uniform application of the appropriate frequency rate of identity checks and physical checks on certain consignments of animals and goods. In particular, Annex I states the baseline criteria and baseline frequency rates for identity checks and physical checks.
4	**Export certificates for food**	**Export Health Certificate** An Export Health Certificate issued by the Singapore Food Agency (SFA) is required for each consignment of non shelf-stable composite products and composite products containing any meat or colostrum-based products. For exports that require an Export Health Certificate, you may forward the import permit / conditions to SFA here. In particular, EU entry conditions for composite products contains summary of the requirements applicable to composite products imported into the EU. Regulation (EU) 2022/2292 (as amended and corrected by Regulation (EU) 2023/2652 adds supplementary requirements for the entry into the EU of consignments of certain animals and goods. - In particular, Article 20 states the requirements for consignments of composite products with the

		exclusion of shelf-stable composite products that do not contain meat products. - In particular, Article 21 states that (a) composite products that need to be transported or stored under controlled temperature as well as (b) composite products that do not need to be transported or stored under controlled temperatures and contain any quantity of colostrum-based products or meat products – with the exclusion of shelf stable composite products that do not contain any colostrum-based products or processed meat (except gelatine, collagen or highly refined products) – shall enter the EU only where the consignment is accompanied by an official certificate signed by the responsible competent authority. - In particular, Article 22 states that (a) composite products that do not contain colostrum-based products or meat products; and (b) shelf-stable composite products that do not contain any colostrum-based products or processed meat (except gelatine, collagen or highly refined products) as well as (c) composite products that do not need to be transported or stored under controlled temperature and contain processed products of animal origin other than colostrum-based products or meat products shall enter the EU only where the consignment is accompanied by a private attestation signed by the importing food business operator. Regulation (EU) 2025/637 amends Regulation (EU) 2022/2292 regarding the requirements for certain dairy products, …, and composite products containing gelatine capsules. No private attestation should be required for the entry into the Union of composite products that do not contain any processed product of animal origin other than gelatine capsules not derived from ruminant bones. Regulation (EU) 2020/692 lays down supplementing animal health rules concerning consignments of certain species and categories of animals, germinal products, and products of animal origin. - In particular, Article 162 states that composite products containing meat products, non-shelf stable composite products containing dairy products and/or egg products, and composite products containing colostrum-based products must come from third country where the products of animal origin are EU-approved. - In particular, Article 163 states that shelf-stable composite products that do not contain meat products (expect gelatine and collagen or colostrum-based products) must use dairy products that have undergone risk-mitigating treatment in Annex XXVII and egg products must that have undergone risk-mitigating treatment in Annex XXVIII.

		Regulation (EU) 2023/2744 and Regulation (EU) 2022/2504 amend Regulation (EU) 2020/2235 that lays down rules regarding animal health / official certificates for the entry into the EU. - In particular, Article 28 states that the model animal health/official certificate for composite products containing any quantity of meat products (except gelatine, collagen and highly refined products) shall correspond to the model COMP certificate as set out in Chapter 50 of Annex III. - In particular, Article 33 states that the model private attestation for shelf-stable composite products containing processed products of animal origin other than processed meat shall correspond to the model private attestation as set out in Annex V.
5	**Regulations and standards**	Interested exporters who wish to export composite products to the EU must meet all their regulations and standards. The following links are provided as a guide: **(1)General Principles** Regulation (EC) No 178/2002 lays down the general principles and requirements of food law governing food and feed in general, and food and feed safety in particular. It also lays down procedures for matters with a direct or indirect impact on food and feed safety. Regulation (EU) 2017/625 lays down rules for the performance of EU official controls and other official activities by the competent authorities of the Member States. For more information on the legislation on official controls, please click here. **(2)Food Hygiene** Regulation (EC) No 852/2004 lays down general rules for food business operators on the hygiene of foodstuffs. This Regulation shall apply to all stages of production, processing, and distribution of food. In particular, Chapter IV Article 10 states the requirements that are relevant to imported food. Regulation (EC) No 853/2004 lays down specific rules on the hygiene of foodstuffs of animal origin for food business operators. They shall apply to unprocessed and processed products of animal origin. In particular, Chapter II Article 6 states the obligations of food business operators concerning imported food on products of

		animal origin. Such products must be imported from third country of dispatch listed and approved by the EU. **(3)Microbiological Criteria** Regulation (EC) No 2073/2005 lays down the microbiological criteria for certain microorganisms and the implementing rules to be complied with by food business operators when implementing the general and specific hygiene measures referred to in Article 4 of Regulation (EC) No 852/2004. Regulation (EU) 2024/2895 lays down the amended food safety criteria for *listeria monocytogenes* for ready-to-eat foods. **(4)Contaminants** Regulation (EU) 2023/915 lays down the maximum levels for certain contaminants in foodstuffs. Food with levels of contaminants higher than those specified in the Annex to this Regulation shall not be sold in the market. The maximum levels shall apply to the edible part of food concerned. Regulation (EU) 2025/1891 regulates maximum levels of inorganic arsenic in fish and other seafood. **(5)Veterinary Drugs Residues** Regulation (EU) 2023/905 supplements Regulation (EU) 2019/6 regarding the application of the prohibition of use of certain antimicrobial medicinal products in animals or products of animal origin exported from third countries. In particular, Article 3 restricts the use of certain antimicrobial medicinal products in animals or products derived therefrom that are laid down in Regulation (EU) 2022/1255. Regulation (EU) 2023/2203 amends Regulation (EU) No 37/2010 that lays down the maximum residue limits (MRLs) for pharmacologically active substances. Table 1 of Annex lists the allowed substances and Table 2 lists the prohibited substances. **(6)Pesticide Residues** Regulation (EU) 2023/1719 and Regulation (EU) 2023/1536 amend Regulation (EC) No 396/2005 that establishes the maximum levels of pesticide residues (MRL) in or on food and feed of plant and animal origin or parts. The EU Pesticides Database allows users to search for information on active substances used in plant protection products, Maximum Residue Levels (MRLs) in food products, and emergency authorisations of plant protection products in Member States.

		(7)Food Additives Regulation (EU) 2024/238 amends Regulation (EC) No 1334/2008 that lays down rules on flavouring and food ingredients with flavouring properties for use in and on foods. In particular, Chapter III Article 9 establishes flavouring and source material for which approval is required. The Food Flavourings Database allows user to search for information on the flavouring substances approved for use in food and their conditions of use. In addition, 8 smoke flavourings will no longer be permitted for use in the EU by early 2029. Regulation (EU) 2023/2108 and Regulation (EU) 2023/2086 amend Regulation (EC) No 1333/2008 that lays down rules on food enzymes used in foods, including such enzymes used as processing aids. In particular, Chapter IV Article 14 states that for food enzymes which are not included in the risk assessment of the European Food Safety Authority (EFSA), the producer of that food enzyme, before marketing the food enzyme, shall submit to the Commission the necessary data. Regulation (EC) No 1332/2008 lays down rules on food enzymes used in foods, including such enzymes used as processing aids. In particular, Chapter IV Article 14 states that for food enzymes which are not included in the risk assessment of the European Food Safety Authority (EFSA), the producer of that food enzyme, before marketing the food enzyme, shall submit to the Commission the necessary data. Regulation (EC) No 2065/2003 lays down a Community procedure for the evaluation and authorisation of primary smoke condensates and primary tar flavourings for use as such in or on foods or in the production of derived smoke flavourings for use in or on foods; and a Community procedure for the establishment of a list of primary smoke condensates and primary tar flavourings authorised to the exclusion of all others in the Community and their conditions of use in or on foods. Regulation (EC) No 1925/2006 establishes the harmonized requirements on the addition of vitamins and minerals and of certain other substances to foods. In particular, Chapter II Article 3 states that only vitamins and/or minerals listed in Annex I, in the forms listed in Annex II, may be added to foods, subject to the rules laid down in this Regulation.

		Directive 2009/32/EC establishes the extraction solvents used or intended for use in the production of food and food ingredients. It does not apply to extraction solvents used in the production of food additives, vitamins, and other nutritional additives, unless such food additives, vitamins or nutritional additives are listed in Annex I.
6	**Labelling, packaging and marking requirements**	**(1)Labelling** Regulation (EU) No 1169/2011 establishes food labelling requirements. Chapter IV Section 1 Article 9 states the list of mandatory particulars to be included in the food label. Article 13 states the presentation of mandatory particulars which include font size. Section 2 Article 26 states that the country of origin or place of provenance must be indicated for meat failing within the Combined Nonmenclature codes as listed in Annex XI. Section 3 Article 30 states the content of the mandatory nutrition declaration to be included in the food label. Regulation (EC) No 1924/2006 establishes the harmonized requirements on use of nutrition and health claims on foods. Regulation (EU) No 432/2012 establishes a list of permitted health claims made on foods. The EU Register of Nutrition and Health Claims allows user to check for information only on (i) permitted nutrition claims and their conditions of use, (ii) authorised health claims and their conditions of use and applicable restrictions if any, and (iii) non-authorised health claims and the reasons for their non-authorisation. **(2)Packaging Materials** Regulation (EC) No 1935/2004 stipulates the requirements for materials and articles, including active and intelligent food contact materials, which in their finished state are intended to be or already in contact with food. The EU Commission has also adopted a ban on the use of Bisphenol A (BPA) in food contact materials. In particular, Article 5 states that specific measures may be adopted or amended for the groups of materials and articles listed in Annex I. Such specific measures include but are not limited to the following: - Regulation (EU) 2025/351, Regulation (EU) 2023/1627 and Regulation (EU) 2023/1442 amend Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, - Regulation (EU) 2025/40 on packaging and packaging waste. Amongst others, it states that sticky labels affixed to fresh fruits and vegetables shall be compostable packaging, forbids the use of single-use plastic packaging (nets, bags, trays, containers) for less than 1.5kg of pre-packed fresh fruits and vegetables, and requires overseas manufacturers to carry out appropriate conformity assessment

		procedures on packaging. - Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods, - Regulation (EC) No 1895/2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food, - Directive 2007/42/EC of relating to materials and articles made of regenerated cellulose film intended to come into contact with foodstuffs, - Directive 94/62/EC lays down measures aimed at preventing the production of packaging waste and as additional fundamental principles at recovering packaging waste, and - Directive 84/500/EEC on the approximation of the laws of the Member States relating to ceramic articles intended to come into contact with foodstuffs. Regulation (EC) 2025/40 regulates all packaging placed on the market in the Union and to all packaging waste. **(3)Identification Marking** Regulation (EC) No 853/2004 lays down specific rules on the hygiene of foodstuffs of animal origin for food business operators. In particular, Article 5 states that products of animal origin must be affixed with identification marks in compliance with Section 1 of Annex II.
7	**Other information**	**(1)EU Control System** More information on imports to EU (including sanitary and phytosanitary requirements) are also available on DG SANTE website EU entry conditions for composite products and DG Trade portal Access2Markets. Competent authorities in EU Member States are responsible for carrying out official controls and enforcement systems to verify business compliance. All business operators must ensure compliance. Imported products can be inspected at the time of import or at all further stages of distribution and marketing. Information on the infringements of EU food and feed legislation (such as identified and detected health risks and hazards) and risk treatment measures are notified and shared through the Rapid Alert System on Food and Feeds (RASFF). For animals (including animal products), the use of TRACES (TRAde Control and Expert System), initiated by economic operator responsible for the consignment in EU, for the issuance of Common Health Entry Documents

		(CHED) is mandatory. This pre-notifies the Border Control Post of the arrival of consignment because such imported live animals and animal products may present transmission risks of human and animal diseases. The Border Control Post will then determine the official controls to be performed and make any decisions taken on that basis. The competent authority of the country of final destination will finally confirm the status of consignment and the basis of the authority's decision. **(2)EU Import Procedures & Legal Framework for Food Labelling** Guide for import of goods outlines the general steps to import products to the EU. Reports and guidelines that cover the veterinary border control topic. Products of animal origin for human consumption that cover the health requirements. Import of Composite Products into the EU that cover the Questions & Answers on composite products. Special report 23/2024: Food labelling in the EU provides on overview of food labelling rules as well as recommendations to improve. **(3)WTO Import Licensing Procedures** European Union's legislation and notifications European Union's participation in WTO **(4)USDA Resources** European Union FAIRS Country Report provides guidelines on the EU's food import regulations to American exporters. Germany FAIRS Country Report provides guidelines on Germany's food import regulations to American exporters.

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