



## New Rules Governing the Trade of Genetically Modified Food Products and their Components

*By Omar Sherif, Passant Ashraf and Ahmed Sameh*

### Introduction

On 4 January 2026, the National Food Safety Authority (“**NFSA**” or “**Authority**”) issued decree No. 1 of 2025 (“**Decree**”), regarding the regulation of the trade of genetically modified food products and their components.

The purpose of the Decree is to ensure the safety of the consumer and to limit any harm that may arise from the trade of genetically modified food products. This Decree was published in the Official Gazette and has entered into force on 5 January 2026, the day following its publication.

The Decree further grants importers and producers a grace period of six months to regularize their status.

We will delve into the key highlights of the legislation as follows:

### Applicability of the Decree

The Decree concerns the trade of food products genetically modified if the final product concerned is composed of more than 1% genetically modified ingredients.

The Decree defines the genetically modified food products as genetically modified organism intended for use in the food sector or as a source of material for food production

Under the Decree, the trade of any foods, food products, food additives, or preparations of food additives that contain genetically modified foods or their components is prohibited, where it is established by documentary evidence that their trade is not permitted in the country of origin.

### General Obligations Under the Decree

Food establishments trading genetically modified food products must obtain the food trade license issued by the NFSA prior to the release of the product on the market. Additionally, these establishments have the obligation to reveal the percentage of genetically modified ingredients contained in the final products.

Further, establishments using genetically modified foods or their components, whether as single or multiple ingredients or as a main ingredient in a food product, must clearly label them as (genetically modified) in parentheses on the ingredient list.

In addition, importers, exporters, distributors, developers, manufacturers, and producers of genetically modified foods or their components that may cause harm if released shall be obliged to notify NFSA thereof.

Where NFSA decides that disposal is required, the responsible party shall, at its own expense, dispose of, destroy, or return to the country of origin the organisms (genetically



modified foods) or their components that are in violation of the provisions of this Decree, under the supervision of the Authority and following prior coordination therewith.

### Regulatory Oversight

NFSA shall undertake the tasks and activities of monitoring and supervising genetically modified foods or their components. The Authority shall carry out regulatory oversight activities over food establishments to assess the extent of their compliance, through conducting announced and/or unannounced inspection visits, in order to verify compliance with the food safety requirements and conditions issued in this regard.

### Market Reaction

The Decree has not yet prompted any observable responses in the market. Given its novelty, it is too early to gauge the full impact. Over the coming months, food establishments and importers may begin adjusting their status as the implications of the new regulation become clearer.