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## Halal compliance, the big issue?

One of the areas that our International Regulatory Affairs team frequently get asked about is compliance with Halal requirements – and understandably so, as the situation is complicated!

This white paper gives some background on the requirements of Halal, and associated legislation.

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or visit us at the Food and Drink Expo at the NEC, Birmingham on 18-20 April – stand F108.

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## What is Halal?

To understand Halal, we advise referring to the Halal guidelines that are laid down in Codex Alimentarius [CAC/GL 24-1997](#) on General Guidelines for use of the term Halal. This standard provides the background information needed to understand what it means to be Halal “permitted” and “non Halal” and therefore considered unlawful. This guideline includes a few examples of lawful "permitted" food, additives etc, and is a useful guide when looking at a product formulation to determine if Halal compliance is even a possibility.

A question we often get asked is whether Halal is a mandatory requirement on all food products or only on specific products? The answer is that Halal principally concerns meat products. However, there are certain additives where the origin must be stated as to whether it is from an animal or vegetable origin. There are also questions around enzymes, rennet and gelatine. In addition, alcohol is not permitted and therefore is considered to be not Halal. Finally, any pork and pork products are also not Halal. Therefore a product with pork gelatine is not permitted according to Halal requirements, and is therefore not Halal.

It is also stated in Codex that when a claim is made that a food is Halal, the word Halal or equivalent terms should appear on the label. However, it is important to consider in addition to the Codex guideline that it is necessary to be compliant with country specific Halal standards when applicable.

## The International Challenge

Halal compliance is of particular relevance when it comes to exporting to the GCC, Indonesia, Malaysia, and Middle East, but it also has significance all over the world. The main challenge faced by manufacturers is that Halal standards differ between countries – some ingredients that may be Halal in some countries are either "questionable" or "not permitted" in others. Therefore, although there might be overlap between Halal requirements in various countries, the differences are such that products will need to be checked for compliance for each individual export market.

Gulf Cooperation Council (GCC) countries, which include the UAE, Saudi Arabia, Oman, Qatar, Bahrain, Kuwait and Yemen, have harmonised their Halal standards. But, be aware that these have recently been updated: Previously there were Standards such as GSO 1931/2009 on Halal food part 1- general requirement, also GSO 2055/2010 on Halal food part 2 - guidelines for Halal food certification bodies and the accreditation requirements. Also there was 993/1998 on Animal slaughtering requirements according to Islamic law.

The new Gulf standards for regulating Halal in the GCC countries are listed below, but please note that most of them are available in Arabic only:

- GSO 993/2015 on Animal slaughtering requirements according to Islamic law
- GSO 2055-1/2015 on Halal food- part1- General requirement. This standard is available in Arabic only.
- GSO 2055-2/2015 on Halal products –part 2- Requirements for Halal certification bodies. This standard is available in Arabic only.
- GSO 2055-3/2015 on Halal products- part 3- Requirements for Halal accreditation body accrediting Halal certification. This standard is available in Arabic only.

- GSO 2468/2015 on Halal foods- Management system requirements for transportation of goods and/or cargo chain services. This standard is available in Arabic only.
- GSO 2469/2015 on Halal foods- Management system requirements for warehousing and related activities
- GSO 2470/2015 on Halal foods – Management system requirements for retailing.

Going forward you might be interested to know that there is currently a project in preparation on Halal food terms and definitions by the GCC.

In Canada there are also some current legislation changes to note. As of 4<sup>th</sup> April 2016, the [new halal labelling and advertising requirements](#) will be enforced following a two-year transition period. Therefore, food labels, packaging and advertising materials with Halal claims will need to be accompanied by the name of the organisation or the person that certified the product as Halal. It is clear that, with global trade, there is a strong push for the development of a harmonised unified Halal standard. The Emirates Authority for Standardisation and Metrology (ESMA) has taken the lead on this project. A Halal certificate can be obtained from ESMA, and ESMA accepts Halal certificates from Halal certification bodies that are registered with ESMA. Also the GAC (Gulf Accreditation Centre) from Gulf Standardisation Organisation (GSO) provides the certificate of conformity and Halal.

### **Ongoing Halal debates**

The quantity of alcohol permitted in a Halal food is an ongoing debate. It has always been questioned how to view alcohol if it is present accidentally in trace amounts in the final product following a food process such as fermentation – would it then be permitted? If so, the question is how much is permitted? Some commodity standards may already lay down such information, some others will not, and some clearly state that ethanol or alcohol is not permitted. However, food manufacturers will be happy to know that there is a project in preparation in GCC regarding setting the maximum limits for residues of ethyl alcohol (ethanol) in food.

### **Any Questions?**

If you have any questions, or need assistance in exporting to the GCC, North Africa or the Middle East please contact our expert in this area, Dr Linda Amirat, directly. Linda is also offering free clinics at the Food and Drink Expo in Birmingham on 18-20 April 2016 - Stand F108 – so please contact her to book an appointment.

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Our large International Regulatory Affairs team includes experts covering the major global export markets. If you need assistance in this area, please e-mail [foodlaw@campdenbri.co.uk](mailto:foodlaw@campdenbri.co.uk) or call us on +44 (0)1386 842000.

Our international team will also be available for discussion at our stand F108 at the Food and Drink Expo in Birmingham on 18-20 April 2016.