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Report Highlights:

Ukraine has made very tenuous steps on the way to a well defined and functioning biotech regulatory system. Some new legislation was developed over the year. New legislation put in place the process for creation and certification of the state GMO testing labs (over 20 labs will be certified by December 2011). Genetically Modified (GM) soybeans were allowed in animal feed according to a new temporary Government of Ukraine (GOU) resolution. The authority for feed approval is now a responsibility of the State Committee of Veterinary Medicine. There is a mandatory Labeling Law requiring all food products on the market be labeled either "Contains GMO" or "No GMO". A list of food products that will require GMO testing and labeling is being considered for approval by the GOU. This lacks legislative validation. Cabinet of Ministers has approved a resolution that defines a framework for registration of GM animal feed, GM feed additives, and GM-derived veterinary treatments.

General Information:

SECTION I. EXECUTIVE SUMMARY

For a while Ukraine continued to claim a status of “GM-free agriculture”. However, after Ukraine’s accession to the WTO in 2008 in fulfillment of its obligations, the country has made some steps in the development of legislature for biotech registration and approval. The main regulatory document is the Law of Ukraine “On State System of Bio-safety in Creating, Testing, Transporting and Using Genetically Modified Organisms” signed on May 31, 2007. The other legislation exists and is being developed under the umbrella of this bio-safety law. The biotech regulatory framework in Ukraine is yet to become well defined.

Mandatory GM labeling is being enforced in Ukraine since January 2010 for all food products that are commercially produced and sold in the country. In compliance with this regulation producers have to include an informative message “Contains GMO” or “No GMO” on food product packaging according to test results conducted for product certification. GM product testing and certification is administered by the State Committee of Ukraine for Technical Regulation and Consumer Policy (SCUTRCP).

Cabinet of Ministers of Ukraine has approved the procedures for registration of GMOs for animal feed, feed ingredients and additives, veterinary medicines that contain GMOs or are produced with their use.

GM soybean variety - Monsanto’s Roundup-Ready® Soybeans MON 40-3-2 – is now temporarily included in the registered sources of animal feeds in Ukraine. This event can be considered a positive step in GM developments in Ukraine. Animal feed produced with GM soybeans will have to undergo testing and risk assessment prior to being approved for consumption in Ukraine. This demonstrates that when someone influential in Ukraine wants GM, it is possible to get a GM product approved or “temporarily approved” for use.

SECTION II. PLANT BIOTECHNOLOGY TRADE AND PRODUCTION

For many years GMOs were not allowed for commercial use in Ukraine. Production or importation of biotech products for sale in Ukraine was prohibited as a result of absence of an established system for GMO detection and approval in the country. At present, legislation and a state regulatory system are slowly developing. Yet, at present, no GM plant varieties are approved for commercial planting or sale in Ukraine. Reasonable doubts exist as to the “GMO-free” status of agricultural plantings in Ukraine. Historically a weak regulatory system and a lack of field surveillance programs left this point under question. It is estimated that over half of Ukraine’s soybean production are Round-up Ready Soybeans. Other plantings of biotech crops are also suspected (corn, sugar beets, etc.).

In April 2009, the GOU adopted the procedures for biotech product transit. The approval for GMO transit is the function of the Ministry of Environment. The procedure came into effect on June 1, 2009.

Based on official data in recent years in Ukraine there were no imports of GM products or products derived from GM technology. However, considering the incompleteness of GMO testing and registration system in the country, some products that have entered the Ukrainian market likely contain GMOs, and some products produced in Ukraine from GM soy or corn grown in Ukraine, are likely present in the food chain.

Trade

In 2009, Ukraine imported products that may contain GM events for a total value of \$60.8 million, compared to \$103.6 million in 2008. The economic crisis and reduced purchasing power due to currency devaluation and recession have had an indeterminate effect on the decline in imports. There has been pressure on trade to comply with biotech labeling as well.

Table 1 shows a summary of Ukraine's import data for major products that may contain GM corn or soybean events: Corn Flour (HS 110220), Corn Meal and Groats (HS 110313), Processed Corn (HS 110423), Soy Beans (HS 120100), Soy Sauce (HS 210310), Protein Concentrates (HS 210610), Corn Gluten (HS 230310), Soybean Meal (HS 230400), Protein Isolates (HS 350400). Please note that processed food products and animal feed were not part of this research. Seeds for planting were not part of this research.

Table 1. Ukraine's Imports of Products that Could Be Affected by Ukraine's Biotech Regulation

HS	Description	2007		2008		2009		% Change
		Value \$ million	Share %	Value \$ million	Share %	Value \$ million	Share %	2009 / 2008
110220	Maize (Corn) Flour	0.072	0.1	0.000	0.0	0.000	0.0	-80.3
110313	Maize (Corn) Groats And Meal	0.068	0.1	0.115	0.1	0.226	0.4	97.0
110423	Processed Maize (Corn)	0.000	0.0	0.000	0.0	0.000	0.0	0.0
120100	Soya Beans	0.489	0.6	0.926	0.9	0.734	1.2	-20.8
210310	Soya Sauce	0.714	0.9	1.586	1.5	1.263	2.1	-20.3
210610	Protein Concentrates	7.138	9.3	10.119	9.8	7.138	11.8	-29.5
230310	Corn (Maize) Gluten	0.051	0.1	0.042	0.0	0.050	0.1	18.8
230400	Soya-Bean Meal	59.465	77.5	76.681	74.0	44.157	72.7	-42.4
350400	Protein Isolates	8.778	11.4	14.143	13.7	7.207	11.9	-49.0
Total		76.774	100.0	103.612	100.0	60.777	100.0	-41.3

Source of Data: State Customs Committee of Ukraine

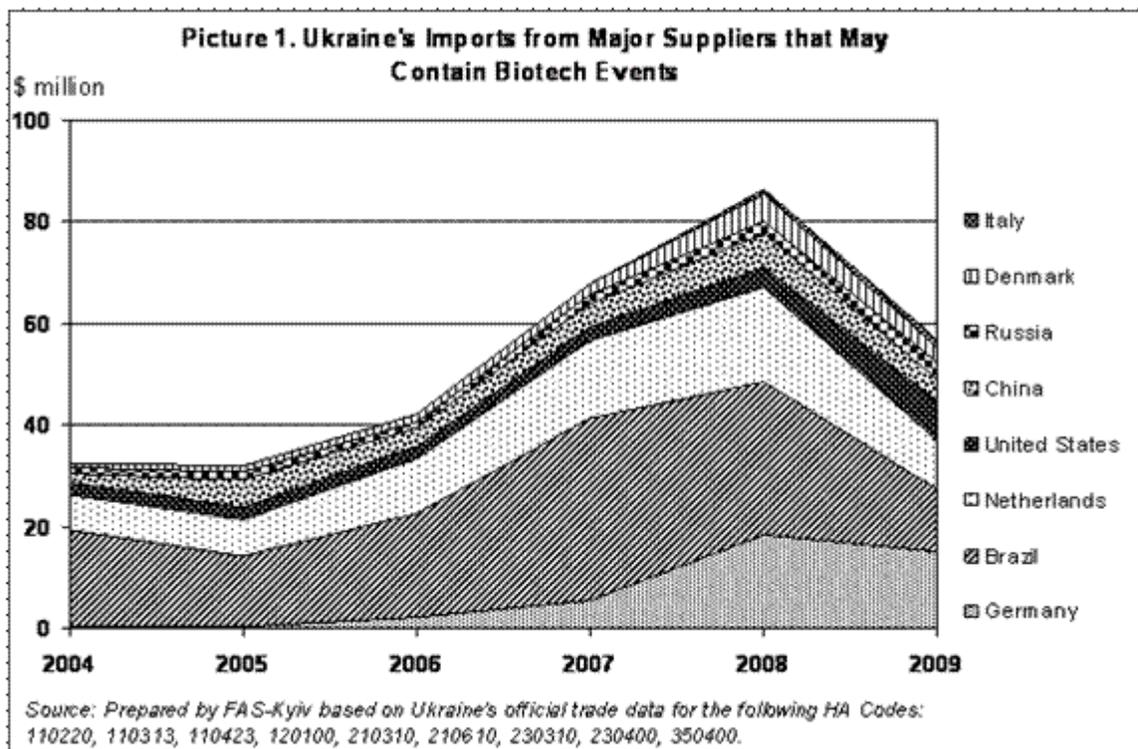
In 2009, the United States held the fourth place in Ukraine's imports of products that may contain GM events (see Picture 1).

The following table illustrates the U.S. exports of food and agricultural commodities that are affected, or may be affected, if Ukraine fails to complete the implementation of the regulatory and approval system for biotech products (see Table 2).

Table 2. Imports of U.S. Products that Could be Affected by Ukraine's Biotech Regulations

HS	Description	2004	2005	2006	2007	2008	2009	% Change
								2009 / 2008
110423	Processed Maize (Corn)	0.000	0.000	0.000	0.000	0.000	0.000	0
120100	Soya Beans	0.044	0.029	0.366	0.068	0.177	0.000	-100
210310	Soya Sauce	0.014	0.023	0.109	0.144	0.544	0.256	-52.92
210610	Protein Concentrates	0.053	0.477	0.405	0.324	1.325	0.224	-83.1
230310	Corn (Maize) Gluten	0.000	0.000	0.000	0.000	0.000	0.000	0
230400	Soya-Bean Meal	1.184	0.173	0.114	0.839	1.099	7.121	547.96
350400	Protein Isolates	1.040	1.753	1.393	1.469	0.640	0.074	-88.42
Total		2.335	2.455	2.387	2.844	3.786	7.676	102.75

Source of Data: State Customs Committee of Ukraine



SECTION III. PLANT BIOTECHNOLOGY POLICY

GM Production and Trade Legislation

Ukraine committed to establishing a functional approval and regulatory framework for biotech products as part of its obligations under WTO accession, which occurred on May 16, 2008. The main document that governs biotech events in Ukraine is the “Law of the State System of Biosafety in Creating, Testing, Transporting and Using Genetically Modified Organisms”, signed by the President of Ukraine on June 11, 2007 and published on June 21, 2007.

Ukrainian legislature requires registration of GM products and products that are produced with the use of GMOs. Registration has to occur prior to any product crossing the border of the country. Resolution #475, adopted by the GOU in February 2009 (enforced since June 1, 2009), outlines procedures for state registration of genetically modified organisms that are contained in food, food products, and medical agents that either contain GMOs or are derived from them. The following authorities are listed in the Law of Ukraine as those responsible for GMO issues:

- The Cabinet of Ministers of Ukraine
- The Ministry of Agrarian Policy
- The Ministry of Education and Science
- The Ministry of Environmental Protection (formerly known as the Ministry of Environment and Natural Resources)
- The Ministry of Health
- The State Committee of Ukraine for Technical Regulation and Consumer Policy
- The State Committee of Veterinary Medicine

In late 2009 and in 2010 the following new legislation was developed in Ukraine:

- Resolution #114 “On Approval of Procedures for Registration of GMOs for Human Consumption, for Food Product Ingredients, for Use in Medical and Cosmetic Substances that Contain GMOs or are Produced with the Use of GMOs” signed February 18, 2009.

- GOU Resolution #468 “On Approval of the Food Products Labeling Procedures for Commercial Purposes that Contain Genetically Modified Organisms or are Produced with the Use of GMOs” (May 13, 2009) reintroduced mandatory GMO labeling from July 1, 2009 setting the GMO labeling threshold at 0.1%. This regulation was not enforced and later in the year was replaced by Law #1778-VI and Law #1779-VI.

- GOU Resolution #661 “On Amendments to the GOU Resolution #468” (July 1, 2009). Based on the final version of the resolution, any food product that contains more than 0.9% of GMOs or if the ingredients contain GMOs as well as food products that do not contain GMO but were partially produced with the use of agricultural products that contain GMOs that exceed 0.9% of the product’s total weight, shall be labeled “Contains GMO”.

- Regulation of the Ministry of Agrarian Policy of Ukraine #458 “On the Temporary Registration of GMOs Derived from MON 20-3-2 for Feed Use” (July 1, 2009). Feed products that contain MON 20-3-2 roundup ready soybeans and products made with it are temporary allowed to be used for animal feed purposes in Ukraine.

- GOU Resolution #808 “On the Issues of Conducting Trials and Registration of Genetically Modified Varieties of Agricultural Plants” (July 23, 2009) approves the procedures for trials and registration of GM plants and the procedure for state registration of GM plants in the Open System in Ukraine.

- Regulation of the Ministry of Economy #844/287 “On Approval of the Rules for Determination of the Cost of Detection of Genetically Modified Organisms in Food Products” (approved by the Ministry of Justice on August 20, 2009, #795/16811) sets the basis for testing process for GMO content.

- GOU Resolution #1223 “On Approval of the Tariffs to Conduct Assessments for the State Registration of Agricultural GM Plants in Open Systems” (November 18, 2009) defined tariffs to conduct assessments which could be the basis for the state registration of the cultivated GM plants.

- Law #1778-VI “On Amendments to the Law of Ukraine (Law #771/97) “On Safety and Quality of Food Products” (signed on December 17, 2009 and effective December 30, 2009) established the mandatory labeling of food products per their GM content. The labels should read either “Contains GMO” or “No GMO”.

- Law #1779-VI “On Amendments to Some Legislation of Ukraine on Providing Information About GMO Content in Food Product” (signed December 17, 2009 and effective two months after publication) relates to the Law of Ukraine #1023-12 “On Consumer Rights Protection” and mandates the development and implementation of the registration system of GM and GM-derivative products as well as food product labeling per their GMO content.

- Law #1804-VI “On Amendments to the Law “On the State System of Bio-safety in Creating, Testing, Transporting and Using Genetically Modified Organisms” (signed January 19, 2010 and took effect February 9, 2010) improved the state regulatory mechanism in biosafety. The State Committee of Veterinary Medicine (SCVM) in the Ministry of Agrarian Policy of Ukraine is now responsible for monitoring and registering GM events that are related to animal feed, veterinary medicine, seed and plant material. The Committee is in charge of developing the State Registry of GMOs.

- Resolution of the Cabinet of Ministers of Ukraine #919 dated October 12, 2010 “On Issues of Implementation of Article VII of State Law “On Biosafety System when Developing, Testing, Transporting, and Using GM Organisms.” This legislation provides the framework for registration of GMO feeds, feed additives, and veterinary medicines. The state agency appointed in charge of registration of these products is the State Committee of Veterinary Medicine (SCVM). Ecological expertise is coordinated by the Ministry of Environmental Protection of Ukraine.

The Biotech regulatory system in Ukraine is still under development. Some regulations have been developed and approved while other related pieces are yet missing.

In the late 90’s, the GOU authorized field trials of biotech crops. A number of applications for registration of GM plants were received by the GOU from companies like Monsanto, Syngenta, and Bayer that conduct biotech research and were present

on Ukrainian market at the time. The status of these cases is still “pending”. No new biotech trials are conducted by commercial producers due to their inability to register biotech crops for testing in Ukraine and thus private companies are unable to import the seeds for in-country field experiments.

For historical information, details on plant varieties, and a list of organizations that conducted biotech trails in Ukraine in the past, please refer to the [2009 FAS-Kyiv Report on Agricultural Biotechnology in Ukraine](#).

Ukraine is a party to the Cartagena Biosafety Protocol (CBP) and it entered into force in Ukraine in 2003. Ukrainian legislation is still being modified in reference to CBP and to bring regulation in compliance with the Cartagena Protocol. Risk assessment procedures for evaluation of Living Modified Organisms (LMOs) have not been established yet. The country is also in negotiations with an aim to join the European Union, which has a potential to influence GMO developments in Ukraine in the next few years.

There is also a WTO notification from Ukraine concerning seeds for planting and GMO testing. The Ministry of Agrarian Policy of Ukraine recently sent in WTO Notification #31 (see Appendix 1 for unofficial translation) on sampling of seeds imported into Ukraine in order to determine the presence of GMOs. This is to notify development of draft legislation that will set forth a notion of sampling and testing for GMO presence for every lot of seeds imported to Ukraine. Every seed shipment would have to be certified per test results.

GMOs in Animal Feed

Currently, agricultural products such as animal feed that contain meal, not whole GM seeds, are being considered for use in Ukraine. In 2009, regulation #458 of the Ministry of Agrarian Policy of Ukraine temporarily included Monsanto’s Roundup-Ready® Soybeans – MON 40-3-2 – to the registry of feed sources. This opens a door for feed products that contain soybeans with genetically modified trait, MON 40-3-2, to be used in animal feed in Ukraine. However, feed products produced with GMOs have to undergo trials and risk assessment in accordance with Ukrainian state regulations before anything is allowed for sale on the open market in the country. The official registry of animal feed that contains GM ingredients (to be used to define a list of permitted GM products as feed imports) has yet to be approved by the GOU.

According to the Cabinet of Ministers’ Resolution #919 that regulates the state registry of biotech products for animal feed and for veterinary medicine, GMO products are registered in Ukraine free of charge for a 5-year term. All records of GMOs registered by the State Committee for Veterinary Medicine (SCVM) in Ukraine are recorded in the State Registry of GMOs. Decisions about state registration (whether the registration is granted or declined) are made within 10 working days after application submitted to the SCVM. An applicant may be declined in state registration of any GMO if significant scientific evidence is found that proves negative effects of this GMO on human or animal health or on the environment in general in cases when that GMO is used in accordance with its original purpose.

Labeling

On December 30, 2009, labeling of food products in Ukraine as either “Contains GMO” or “No GMO” became mandatory. Originally, GOU Resolution #468 “On Approval of the Procedures for Labeling of Commercial Food Products that Contain Genetically Modified Organisms or Products Derived from GMOs” was signed on May 13, 2009. However, enforcement of mandatory labeling was postponed until the end of 2009, when Law #1778-VI came into force. Current Ukrainian Law mandates that GM labeling is a responsibility of producer/supplier.

The rule for labeling “Contains GMO” is as follows: According to GOU Resolution #661, any food product that contains more than 0.9% of GMOs, or if any ingredient in a food product contains GMOs as well as food products that do not contain any GMOs but are produced at least in part with agricultural products that contain GMOs and the total weight of GMO or GMO derived products in a single food product package exceeds 0.9% of its total weight, this food product has to be labeled “Contains GMO”. The criteria for labeling “No GMO” is as follows: If a single package of food product contains 0 or less than 0.9% GMOs, it shall be labeled “No GMO.” Products without relevant labeling are not permitted for sale in Ukraine and are a subject to confiscation and fines.

The GOU believes this labeling requirement is in line with good international practice and satisfies consumers' right to be aware of the content of food products they purchase.

At present, the GM labeling legislation is being re-evaluated while producers debate the need to label food products, especially the ones that could not contain GMOs. It is apparent that consumers may become confused about biotechnology when they see bottled water or table salt labeled "No GMO".

Official data from the State Committee of Ukraine for Technical Regulation and Consumer Policy (SCUTRCP) indicates that in 2010 5.9% of food products that were tested contained GMOs. Out of 11,720 product samples tested between January 1 and November 5, 2010, 702 contained GMOs. In particular, the products that tested positive for GMO content were bread, bakery products, sugar based sweets, meat and sausage, processed meat and dairy products. In comparison, in 2009, there were 4,697 food products tested by SCUTRCP and 254 samples were found to contain GMOs, which is about 5.4% of the total.

SCUTRCP states that they have 14 labs certified to conduct qualitative and quantitative molecular-genetic analysis of products for GMO detection. There are presently 18 labs in Ukraine with some capacity to test and analyze food products for GMO content. The GOU set an objective to have over 20 labs by the end of 2011 that will be able to conduct GMO testing. A list of products that will require mandatory GM testing (the rest could be spared the trouble of testing and labeling) is being considered by the GOU at present. (See Appendix 1 for details) However, it is currently unknown whether a list will be approved.

Pending Legislation

By the end of December 2011, Ukraine is expected to make changes its legislation in compliance with WTO rules and regulations. This date may be considered an unofficial deadline for the majority of the new biotech regulations to be developed and put into effect.

GOU officials have compiled a draft decree that lists food products for which GM content will be monitored (see Appendix 1). This list was released for public consideration in July 2010. Comments are being accepted at the Ministry of Health of Ukraine. There was no deadline announced for revisions or for final decision on this draft document. Its status is 'Pending' at the time this report is released. If this legislation is approved, this will change the burden of testing for food manufacturers that currently have an obligation to test for GM and label all food products, including ones with no protein.

On the other hand, it is important to note that there were two draft laws submitted for GOU consideration at the end of 2009 that had the potential to completely ban GMOs from Ukraine. These draft laws still have the status of 'Pending' notwithstanding another draft resolution developed in the summer of 2010 that would abolish these draft laws. However, the fact that any of these draft laws was developed and are still being considered indicates that Ukraine is still walking a road that may turn either 'pro GMO' or 'against GMO'.

SECTION IV. PLANT BIOTECHNOLOGY MARKETING ISSUES

Since no biotech product is officially allowed for production or for human consumption in Ukraine at present, marketing GM products in this country is not feasible. Only biotech soy bean meal was approved (temporarily) in 2009 for animal feed use. However, animal feed that contains GMOs or ingredients that are at least partially produced with GMOs have not been registered and approved for use in Ukraine. Thus, it is too early to start marketing biotech products for animal feed in Ukraine.

With strict food product labeling laws in place in Ukraine consumers are getting the impression that "GM" is something that the GOU does not want people to consume. In the future, when and if biotech products are officially allowed for production or for consumption in Ukraine, producers will face the task of overcoming negative public opinion on the topic. Marketing products that contain GMOs or derived from GMOs will not be easy.

In general, the public in Ukraine lacks awareness on what biotech is or how GMOs and products derived from GM technology can affect their health or the environment. A phone-survey conducted in November 2009 in different regions of Ukraine by Kyiv Gorshenin Institute of Management Issues involved 1000 respondents. The findings indicate that 89.7% of respondents believed the GOU should approve legislation that bans importation and production of products that contain GMOs. Also, 74.7% of Ukrainians surveyed did not plan to buy genetically modified food even if it were less expensive compared to conventional food products.

This GMO awareness survey results indicate that 85.6% of respondents believed they know which food products contained GMOs and what the possible risks of consumption of such products are. However, other indicators of public awareness showed the opposite.

Based on a public awareness campaign on biotech issues conducted in major regions of Ukraine by an organization of biotech scientists with some support from FAS/Kyiv staff and the U.S. Embassy Economic Section, a conclusion can be drawn that Ukrainians are not very well informed about biotechnology and its uses. Most Ukrainians have been exposed only to very biased, non-science-based information that was actively provided by anti-biotech groups. The lack of information regarding biotechnology is clearly confirmed by the fact that only 38.2% of respondents are aware of the GM labeling Resolution that came into force July 2009. While 93.4% of respondents believed that mandatory labeling of GMOs should be adopted.

There is an opinion that the GOU may officially permit GMOs in Ukraine “only for export.” Such developments will lead to even further deterioration of public opinion on the issue.

Appendix 1. WTO Notification #31 (unofficial translation of the draft legislation)

Draft Order

" _____ " _____ 2010, Kyiv number _____

On sampling of seeds imported into Ukraine
in order to determine the presence of GMO

There is not any plant variety containing GMO component registered with the State Register for plant varieties that are allowed for dissemination in Ukraine.

Pursuant to Articles 11 and 16 of the Law of Ukraine "On State Bio-Safety System for creating, testing, transportation and use of genetically modified organisms and to timely detect and prevent market access for seeds of unregistered varieties and hybrids of plants having GMOs

I hereby order that:

1. Department of crop markets (O. Demidov), the Ukrainian State Seed Inspection (N.Hrapiychuk), Main State Plant Quarantine Inspection of Ukraine, usually called “Plant Quarantine Inspection” (V.Simonov), the State Service on plant variety rights protection (V. Hadzhymatov) should in their everyday work ensure control over the implementation of the Law of Ukraine “On State Bio-Safety System for creating, testing, transportation and use of genetically modified organisms”.
2. Main State Plant Quarantine Inspection together with the State Customs Service of Ukraine and the Ukrainian State Seed Inspection have to secure commission sampling from the imported seed batch into the territory of Ukraine, prior to its customs clearance directly at customs checkpoint, as well as take samples for phytosanitary control.
3. Ukrainian State Seed Inspection sends a sealed sample accompanied with the act of sampling to one of the accredited testing laboratories according to the list (Appendix 1 - 2) to conduct tests to determine

presence of GMOs.

4. Payment for the sampling, testing and issuance of a certificate confirming absence / presence of GMOs is made by the owner of imported seeds.
5. The certificate confirming absence / presence of GMOs is a mandatory document that is attached to the customs clearance paperwork of a seed lot.
6. Department of crop markets submits the order for state registration to the Ministry of Justice of Ukraine.
7. This order comes into effect on the day of its publication.
8. Control over the execution of the order is assigned to the Deputy Minister I. Demchak.

Acting Minister

S. Melnychuk

There are two Appendices to this document: the first lists State Committee for Technical Regulation and Consumer Policy laboratories (9) that are authorized to conduct tests, the second lists State Sanitary Epidemiological Service of Ministry of Health of Ukraine laboratories (18) that can test seeds, food and foodstuff for GMO.

Appendix 2. List of foods that will require GMO content monitoring if draft resolution on the issue is adopted

1. Soya beans

1. Soybeans
2. Soybean sprouts
3. Soy protein concentrate in its different forms
4. Soy Protein Isolate
5. Soy protein hydrolysate
6. Soy flour in its different forms
7. Replacement of milk (soy milk)
8. Replacement of milk powder (dried soy milk powder)
9. Canned soybean
10. Boiled soybeans
11. Roasted soybeans
12. Roasted soy flour
13. Products derived from or made with soy protein isolate, soy protein concentrate, soy protein hydrolyzate, soy flour, or soy milk powder
14. Fermented soy products
15. Soybean paste and products made with it
16. Soy sauce
17. Products derived from or that contain soy milk (tofu, sour drinks, ice cream, mayonnaise)
18. Soybean oil *
19. Soy lecithin
20. Products derived from or produced with products listed in items 1-19.

2. Corn

1. Corn for human consumption
2. Corn flour
3. Cornmeal
4. Flour mixes that contain corn flour
5. Corn canned and frozen
6. Popcorn made with corn
7. Corn chips
8. Corn oil *
9. Corn starch *
10. Maltodextrin made from corn *
11. Syrups made from corn starch *
12. Glucose produced from corn *

13. Fructose produced from corn *
14. Molasses produced from corn *

3. Potatoes

1. Potatoes for human consumption
2. Frozen processed potato
3. Dry mashed potato mix
4. Potato flakes
5. Potato chips
6. Potato crackers (processed food)
7. Processed fried potatoes: potato slice, French fries
8. Potato concentrates that include: flour for pancakes, dumplings with potatoes (processed food), mashed potatoes that do not require boiling
9. Quick potatoes, including dried potatoes
10. Canned potatoes and canned food that contains potatoes
11. Molasses
12. Potato starch
13. Glucose produced from potatoes *
14. Molasses made from potato *

4. Tomatoes

1. Tomatoes for human consumption (including canned tomatoes)
2. Tomato Paste
3. Tomato puree
4. Tomato juice, drinks
5. Tomato sauces, ketchup
6. Products produced with products in points 1-5

5. Zucchini

1. Natural zucchini
2. Products derived from or made with zucchini

6. Melon

1. Natural melon
2. Products derived from or made with melon

7. Papaya

1. Natural papaya
2. Products derived from or made with papaya

8. Chicory

1. Products that contain chicory

9. Sugar beets

1. Molasses
2. Sugar, glucose, and fructose derived from or made with sugar beets *

10. Rapeseed

1. Rapeseed and products derivative from it, including:
2. Rapeseed oil and products that contain it *
3. Whole and crushed rape seeds

11. Flax

1. Flaxseed oil and products that contain it *

12. Cotton

1. Cotton oil and products that contain it *

13. Wheat

1. Natural wheat
2. Products derived from or made with wheat, including bread and bakery products

14. Sunflower

1. Sunflower seeds and products made with sunflower seeds
2. Sunflower oil *

15. Rice

Products that contain rice, including:

1. Rice groats
2. Rice flour
3. Granulated rice
4. Rice flakes, rice chips
5. Other processed food that contain rice

16. Baby food and raw materials for its manufacturing

17. Foods for special dietary intake, functional foods, dietary supplements

18. Food additives

19. Leavening products, yeast cultures, and products that contain it

20. Rapeseed (canola) and products derived from it

21. Strawberries

22. Coffee beans, tea

Note:

* - Food products that do not contain DNA and are subject to mandatory standard sanitary control: verification of documents and conformity marking.