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## Russian Federation

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### Customs Union Publishes SPS Measures for Public Comment

**Report Categories:**

Sanitary/Phytosanitary/Food Safety

FAIRS Subject Report

Livestock and Products

Poultry and Products

Dairy and Products

Fishery Products

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**Report Highlights:**

The Russian-Kazakh-Belarusian Customs Union (CU) published four draft documents on its website related to its veterinary-sanitary and sanitary-epidemiological requirements. There is a 60-day public comment period, starting October 20, 2011. Interested U.S. parties are encouraged to share their comments and concerns with USDA. When formulating comments, please take into consideration CU Decision № 625 “On Ensuring the Harmonization of Legal Acts of the Customs Union in the Application of Sanitary, Veterinary, and Phytosanitary Measures with International Standards” of April 7, 2011.

**General Information:**

The Russian-Kazakh-Belarusian Customs Union (CU) published four draft documents on its [website](#) related to its veterinary-sanitary and sanitary-epidemiological requirements. There is a 60-day public comment period, starting October 20, 2011. Interested U.S. parties are encouraged to share their comments and concerns with USDA. When formulating comments, please take into consideration [CU Decision № 625](#) “On Ensuring the Harmonization of Legal Acts of the Customs Union in the Application of Sanitary, Veterinary, and Phytosanitary Measures with International Standards” of April 7, 2011.

Several draft amendments, including those for permissible levels for antibiotics have already been approved by the respective Russian sanitary regulation SanPiN 2.3.2.1078-01. See GAIN Report RS1116 of March 31, 2011. Therefore, this action is viewed largely by FAS Moscow as an attempt to bring CU requirements into compliance with existing Russian norms. Russia’s action to move ahead of the official Customs Union decision is not unprecedented.

There are also exceptions to the uniformity between the previous Russian and current draft CU regulatory actions. Most notably, the draft CU amendments propose a permissible level for chloramphenicol in fish, fish products and honey, while Russian SanPiN 2.3.2.1078-01 still maintains zero tolerance for chloramphenicol in these products.

A summary of the draft amendments follows.

1. **Veterinary Border Control:** [“On Amendments to the Regulations on common implementation of veterinary control at the customs border of the Customs Union and in the customs territory of the Customs Union”](#) – original in [Russian](#)

The draft amendment clarifies and strengthens the language on pre-notification in paragraph 6.12.3 regarding sea-shipped imports of meat (beef, pork, meat of sheep, horse meat, poultry) and unprocessed fish products.

2. **Sanitary Product List:** [“On Amendments to the Uniform list of goods subject to sanitary surveillance \(control\) at the customs border and the customs territory of the Customs Union”](#) – original in [Russian](#)

The draft amendment revises definitions of the following ag/food-related categories on the list as follows:

<i>Affected category</i>	<i>Proposed change</i>
<ul style="list-style-type: none"><li>• HS 1107 Malt</li><li>• HS 1210 Hop cones</li><li>• HS 1905 Bread, pastries, biscuits and other baker’s wares</li></ul>	Add the following GMO/food additive clause to the definition: “received with the use of genetically modified (transgenic) organisms and (or) are (according to the documents of the manufacturer (producer)) specialized food products, biologically active additives to food or raw materials for their production, organic products, food additives, complex food additives, flavorings.”

<ul style="list-style-type: none"> <li>• HS 1302 20 Pectin, pectinates and pectates</li> <li>• HS 1302 31 000 0 Agar-agar</li> <li>• HS 1302 32 Glues and thickeners</li> </ul>	<p>Combine all three categories into one as follows: “HS 1302 Juices and vegetable extracts, pectin substances, agar-agar and other glues and thickeners”</p>
<ul style="list-style-type: none"> <li>• HS 2201 10 Mineral water and sparkling water</li> <li>• HS 2501 00 91 Salt</li> </ul>	<p>Make HS codes less specific (by reducing the number of digits to HS 2201 and HS 2501 00, respectively) but make the language of the definition more specific</p>

Additionally, the draft proposes to extend the list by including the following new ag/food-related categories:

- HS 1521 Vegetable waxes
- Items from the following categories when defined as food additives by producer:
  - HS 2807 00 Sulfuric acid
  - HS 2811 Inorganic acids
  - HS 2827 Chlorides, chloride oxides and hydroxides, bromides and bromide oxides, iodides and iodide oxides
  - HS 2832 Sulfites, thiosulfates
  - HS 2833 Sulfites, alum, persulfates
  - HS 2834 Nitrites, nitrates
  - HS 2835 Phosphinates (hypophosphites), phosphonates (phosphites) and phosphates, polyphosphates
  - HS 2836 Carbonates, percarbonates
  - HS 2905 Acyclic alcohols and their halogenates, sulfonated, nitrated or nitrosates derivatives
  - HS 2912 Aldehydes, polymers of aldehydes, paraformaldehyde
  - HS 3912 Cellulose and its chemical derivatives
  - HS 3913 Natural polymers and modified natural polymers
- HS 3002 90 500 0 Cultures of microorganisms for use in food production.

3. **Sanitary Border Control:** [“On Amendments to the Regulations on Procedure of the State Sanitary and Epidemiological Surveillance \(monitoring\) for persons and vehicles crossing the customs border of the Customs Union, the controlled goods moved through customs border of the Customs Union and in the customs territory of the Customs Union”](#) – original in [Russian](#)

The draft amendment adds three paragraphs (two paragraphs to item 22 and one paragraph to item 40) that specify the necessary actions in case of temporary sanitary measures by one of the Parties.

4. **Sanitary Product Requirements:** [“On Amendments to the Uniform epidemiological and hygienic requirements for the goods subject to sanitary surveillance \(monitoring\)”](#) – original in [Russian](#)

In particular, the draft amends permissible levels for antibiotics as follows:

- 1) in meat and meat products as well as in respective fats, concentrates of blood proteins, biologically active substances, canned meat from “not allowed” to the following levels:

<i>Indicator</i>	<i>Permissible Level</i>
Chloramphenicol	0.01 mg/kg (until January 1, 2012) 0.0003 mg/kg (after January 1, 2012)
Tetracycline-group antibiotics	0.01 mg/kg
Bacitracin	0.02 mg/kg

Additionally, the above levels for antibiotics are added for canned meat, for which previously no specific permissible levels for antibiotics were set.

- 2) in milk and dairy products as well as in dairy-and-vegetable spreads, respective biologically active substances, milk formula, soluble biscuits, low lactose and delactosed products from “not allowed” to the following levels:

<i>Indicator</i>	<i>Permissible Level</i>
Chloramphenicol	0.01 mg/kg (until January 1, 2012) 0.0003 mg/kg (after January 1, 2012)
Tetracycline-group antibiotics	0.01 mg/kg
Penicillin	0.004 mg/kg
Streptomycin	0.2 mg/kg

- 3) in fish and fish products, canned fish products and honey adds chloramphenicol and amends the level for tetracycline-group from “not allowed” as follows:

<i>Indicator</i>	<i>Permissible Level</i>
Chloramphenicol	0.01 mg/kg (until January 1, 2012) 0.0003 mg/kg (after January 1, 2012)
Tetracycline-group antibiotics	0.01 mg/kg

- 4) culinary products from fish and non-fish products from “not allowed” as follows :

<i>Indicator</i>	<i>Permissible Level</i>
Chloramphenicol	0.01 mg/kg (until January 1, 2012) 0.0003 mg/kg (after January 1, 2012)
Tetracycline-group antibiotics	0.01 mg/kg
Penicillin (products with dairy components)	0.004 mg/kg

Streptomycin (products with dairy components)	0.2 mg/kg
Bacitracin (products with egg components)	0.02 mg/kg

Additionally, the draft amends the maximum permissible residue level for nitrofurans from “less than 0.1 mg/kg” with a note “not allowed in products of animal origin at the level of method sensitivity” as follows:

Index	Drug name	Type of agricultural animals	Product name	Maximum residue levels (mg/kg, up to)	Notes
1	2	3	4	5	6
45	Nitrofurans (including furazolidone)	All types of slaughter animals, including poultry and pond and cage culture fish, bees	Meat Skin and fat Liver Kidneys Eggs Milk Honey	0.001	To be in effect as of 01.01.201

The draft also amends safety requirements for hot soups and other hot dishes, cheese, fish, meat, poultry dishes, garnishes, sauces and dressings by adding E.coli, Proteus, yeast, and for the many products also adding mold, listeria monocytogenes and sulphite reducing clostridies, and changing the level for KMAFAnM from  $5 \times 10^2$  to the following:

<i>Indicator</i>	<i>Permissible Level</i>
KMAFAnM, cfu/g	$1 \times 10^3$
Coliforms in 1.0 g	not allowed
E.coli in – [in 1.0 g (for porridges/grits/mush only)]	not allowed
S. aureus in 1.0 g	not allowed
Proteus in -	not allowed
Pathogens, including Salmonella, in 25 g	not allowed
Yeast [and mold], cfu/g	100
Listeria monocytogenes, in 25 g	not allowed
Sulphite reducing clostridies, in 1.0 g	not allowed

There are several additional amendments to requirements for biologically active substances and flavors.