PLAN OF EXPORT GUIDELINES TO THE RUSSIAN FEDERATION/CUSTOMS UNION – MEAT AND MEAT PRODUCTS

The aim of this document is to help food business operators of each EU Member State to recognize the food safety requirements for the export of meat and meat products to the Russia Federation (hereinafter "the RF") and the Customs Union (hereinafter "the CU").

I AM A FOOD MANUFACTURER, WHAT SHOULD I DO TO EXPORT MY PRODUCTS TO RUSSIA (RF)/ TO THE CUSTOMS UNIONS (CU)?

- There are certain steps that need to be taken for the RF and the CU market access, such as: prior inclusion of establishments in a register, state registration of the products, and further processes including SPS aspects such as delivery of an import permit to the RF importer, provision of a veterinary certificate, packaging and labelling of the products according to the provisions of the importing country etc.

- As import requirements may change from time to time, exporters are still advised to confirm requirements with their clients (their importers) prior to planning to export, and to review all relative regulations of the RF/CU and ensure that product offered for certification complies with the requirements of the RF/CU.

CHAPTER I

WHAT SANITARY GUARANTEES AND CERTIFICATION NEED TO BE PROVIDED WHEN MY PRODUCTS ARE EXPORTED?

SANITARY AND EPIDEMIOLOGICAL CERTIFICATION REQUIREMENTS

According to the draft CU TR on Food Safety that should enter into force on the 1st of July 2013, only Veterinary Certificates would be required for non-processed food products of animal origin, while only a Declaration of Conformity or State Registration Certificate would be needed for products, which have undergone a treatment which based on scientific evidence eliminated contamination. This chapter mainly focuses on the veterinary certificate, and veterinary register, the state registration certificate and the declaration of conformity being dealt within the administrative part.

- **THE VETERINARY CERTIFICATE**

1 - Scope: Products whose export require that a veterinary certificate is issued.

The CU decision no. 317 lists the products supposed to be certified by the competent authority. Currently very wide, this list will be modified upon the date of the WTO accession as to state precisely what products will need to be accompanied by a veterinary certificate.

- Annex 4 to the Decision No. 830 of the Customs Union Commission of 18 October 2011: Table of list of goods subject to veterinary controls and veterinary control measures applicable to each such goods'' will only enter into force on the date of Russia's accession to the WTO.
2 - Models of certificate

2-1: Specific models negotiated with one of the CU party: bilateral certificates existing before the 01/07/2010.

The existing EU-RF veterinary certificates remain valid until the 1st of January 2013 and should be used by EU Member States rather than the CU common forms of veterinary certificates; the other member states of the CU recognize and permit the transit.

After the 1st of January 2013, the bilateral certificates may be further prolonged if the exporting competent authority has requested it, by that date, in order to negotiate a specific certificate which may have provisions that diverge from the CU common veterinary requirements and from the common form of certificates. In that case, the existing bilateral certificates are prolonged until the negotiations on those new bilateral certificates are concluded.

!!! Particular attention should be paid to the information filled in the certificates, which has to be accurate, as they are scrutinized at the borders. Missing letters, wrong numbers or lack of correspondence of the name of the suppliers with the name in the register are only some of the examples of border rejection.

- 25 EU-RF veterinary certificate forms have been concluded before 01/07/2010. For meat products, they cover:
  - Pork meat and raw meat preparations
  - Deboned beef meat and raw meat preparations
  - Beef meat with bones
  - Poultry meat and raw meat
  - Canned meat, salamis and other ready for consumption meat products

!!! These are being renegotiated and complemented, so please contact your official certifying authority for updated information.

2-2: Models existing in the CU decisions (40 common models), applicable for all origins

Out of these 40 certificates, 12 models concern meat and meat products as well as by products. As regards the Veterinary certificate, the RF committed to revise the CU common forms of certificates before the accession to WTO. The conditions should be brought into compliance with the OIE/Codex rules.

- ELIGIBILITY OF THE PRODUCTS FOR EXPORT TO RF/CU

The eligible establishment is responsible to assure:

- That the raw materials they use for the production of the final products intended for export to RF/CU are eligible. The conditions are to be found in the final export certificate (mainly animal health guarantees related to the animals, from which the products are derived).

- That the process of production in the exporting establishment complies with the RF / CU requirements.
The respect of EU conditions of production is not systematically sufficient to guarantee the respect of RF/CU import conditions. The exporting establishment should ensure that the relevant import requirements going beyond EU requirements are submitted to specific actions so as to ensure they are fulfilled and liaise with its authorities for the certification process to be supported by such additional checks.

• ELIGIBILITY OF ESTABLISHMENT EXPORTING PRODUCTS TO THE RF/CU.

➢ SOURCING RAW MATERIAL IN DIFFERENT ESTABLISHMENTS/DIFFERENT MEMBER STATES

Provision of the certificate: indicating the slaughterhouse, the cutting plant and cold stores in which the animals and meat have been slaughtered and processed. These different establishments should pertain to the lists present on RF/CU registers.

The register of the RF is available by country on Rosselkhoznadzor website: http://www.fsvps.ru/fsvps/importExport?_language=en

For other type of establishments, liaise with your certifying authorities to determine which requirements should apply to these establishments.

- A competent veterinarian is signing the veterinary certificate stating that the animal from which the meat / meat products are derived is eligible and complies with all certification statements. Records supporting the assurances by establishment management must be available for review.
- The microbiological, chemical-toxicological and radiological characteristics of meat and meat products must correspond to actual veterinary and sanitary rules and requirements of the RF/CU.

➢ LEGISLATIVE REQUIREMENTS:

!!!The CU countries are harmonising their sanitary requirements. During this process, the national legislation is not always amended simultaneously. In case of contradicting rules, the CU norms prevail over national requirements.

- General
  - CU
    - Technical regulations of the CU: Food safety (in force from the 1st of July 2013)
  - RF
    - No. 29-FZ of January 2, 2000 on the quality and safety of food products [en] [ru] [pdf]
    - No. 52-FZ of March 30, 1999 on the sanitary and epidemiological welfare of the population [en] [ru] [pdf]
    - No 102-FZ of of 26 June 2008 on metrology and sampling [ru] [en] [pdf]
- **Sanitary and epidemiologic**
  - CU
    - CU Decision No. 299 from 28 May 2010: Uniform sanitary and epidemiological and hygienic requirements for products subject to sanitary and epidemiological supervision (control)
      - Chapter I: General requirements
      - Chapter II, section 1: Safety requirements and nutritional value of food
      - Technical regulations of the CU: Concerning safety of meat and meat products (draft only)
  - Supplement 1: Safety indicators
  - Supplement 2: Hygienic requirements to safety of preserved meat products
  - Supplement 3: Tolerable levels of cesium-137 and strontium-90 radio nuclides
  - Supplement 4: Typical schemes for compliance declaration
- **Hygienic Standards**
  - CU
    - Chapter II, section 15: Requirements for pesticides
    - Chapter II, section 16: Requirements for food contact material
    - Consolidation of MRLs set in the Customs Union requirements (Chapter II, section 15 of the Common sanitary and epidemiological requirements)
  - RF
    - SanPiN 2.3.2.1078-01- Food raw material and foodstuff - Hygienic requirements for safety and nutrition value of foodstuff
      - Consolidated version of the SanPiN 2.3.2.1078-01 until amendment 24 dated 1.6.2011
    - GN 1.2.2701-10 "Hygienic regulations of pesticides in the environment (list)"
    - General provisions of GN 1.2.2701-10
    - Overview of Russian pesticides requirements, developed by Freshfel (NON OFFICIAL DOCUMENT)
Veterinary surveillance
- Regulation on sanitary and epidemiological surveillance at the Customs Union border (Annexes)
- Veterinary surveillance of meat products imported into the Russian Federation in compliance with the requirements of the Customs Union (Presentations by Rosselkhoznadzor)
- The main principles of laboratory control (Presentations by Rosselkhoznadzor)

Guidance
- MUK 4.2.1847-04 on evaluation of shelf-life and storage conditions
- GOST P 8.563 – 2009 on methods of measurement

CHAPTER II
WHAT ADMINISTRATIVE PROCEDURE NEEDS TO BE FULFILLED?

THE STATE REGISTRATION CERTIFICATE
The certificate of state registration of the CU is a document confirming the quality and safety of the product which is valid on the territory of the CU. Notably, the specialized food products or the genetically engineered or modified organisms are subject to this certificate.

- The decision No 299 of 28 May 2010 of the CU Commission, as amended by Decisions No 341 of 17 August 2010, No 383 of 20 September 2010, No 432 of 14 October 2010, No 456 of 18 November 2010 provides for:
  - Regulations and common form of the state registration certificates of the CU (Appendix No 2 and No 3)
  - List of goods subject to state registration (Part II)

- The transition period for the CU Parties to implement the harmonized State registration certificates was until 1 January 2012; each Party recognized the right of each other Party to issue this certificate and that a State Registration certificate would be valid throughout the territory of the CU.
- The producer (manufacturer) or the importer (supplier) of the product may apply for the issuing of the certificate of state registration.
- The State registration certificates should be obtained only once for each type of product (unless required otherwise by the RF/CU legislation).
- The registration body in the RF is Rospotrebnadzor
  - Address: buildings 5 and 7, house 18, Vadkovsky lane, Moscow, 127994, Russia
  - E-mail: depart@gsen.ru
  - Web-site: www.rospotrebnadzor.ru

THE CERTIFICATE AND THE DECLARATION OF CONFORMITY
The conformity of the goods with the norms and standards from CU/ RF are to be proven either through a Certificate of Conformity or a Declaration of Conformity.

- Only those certification bodies and testing laboratories (centres) that are included in the Unified Register of the CU are allowed to issue the Certificate/Declaration of Conformity in unified format.
  - Regulation on the inclusion of the certification bodies and testing laboratories (centres) into the Common register [ru pdf]
  - Regulation on the Common Register of certificates of conformity and declarations of conformity [ru pdf]
  - Common forms of certificate and declaration of conformity [ru pdf]
- Certificates of conformity and adopted declarations of conformity for products, for which the form of conformity attestation has been changed in the Uniform list, are still valid till the expiry date without re-registration. Changes in labelling related to the conformity marking for such products are not required.
- The difference between the Declaration of Conformity (DoC) and the Certificate of Conformity (CoC) is:
  - The DoC is for a product not subject to mandatory confirmation of conformity and is issued by the manufacturer in order to declare that the product is in conformity with the essential requirements of the technical regulations (if it provides the evidence to support the statement).
  - The CoC is for a product subject to mandatory confirmation of conformity and is issued on the basis of the results obtained from testing samples of goods made by a certification body or by a testing laboratory.
  - The producer (manufacturer) or the importer (supplier) of the product may apply for the issuing of the DoC or CoC.
  - Meat and meat products are not subject to mandatory confirmation of conformity.
- According to the draft TR of the CU concerning safety of meat and meat products, before being released for market circulation, meat products shall undergo the procedure of confirmation of compliance with the safety requirements of the TR.
  - The declaration of conformity is made on the basis of:
    - Internal evidence (provided that the Applicant has an internal testing laboratory or an agreement with a testing laboratory);
    - Internal evidence and evidence received with the participation of a third party.
- The schemes of the declaration of conformity adoption (The scheme numbers do not have a correspondent in the TR)

**THE IMPORT PERMITS**

According to CU Decision 317, as amended, exports of meat and meat products to the CU necessitate that the importer has obtained an import permit from his national competent authority.

The management of the import permit system by the Russian competent authority (Rosselkhoznadzor) is regulated by according to the Administrative Regulation approved by the Order of Ministry of Agriculture of the RF No. 404 of 7 November 2011, in force since 28 January 2012.

- Import permits are issued in the name of physical or legal entities that are officially registered in the territory of the RF/CU with the RF/CU tax authorities.
The EU exporters should be aware that the operator in the territory of the RF/CU, which is the importer, should have a valid import permit, as for the import to be possible. If the importer does not have a valid import permit, the meat product will not be allowed to entry the RF/CU.

**THE LISTING OF APPROVED ESTABLISHMENTS**

If an establishment is approved by one member state of the CU, it can export to all the member states of the CU unless specified otherwise in the list.

- The lists of EU approved establishments for the export to CU are available on Rosselkhoznadzor website: [http://fsvps.ru/fsvps/importExport/index.html?_language=ru](http://fsvps.ru/fsvps/importExport/index.html?_language=ru)
- The lists of EU approved establishments for the export to CU are also available on the following website: [http://tsouz.ru/db/techregulation/vetmeri/Pages/Reestrorg.aspx](http://tsouz.ru/db/techregulation/vetmeri/Pages/Reestrorg.aspx), for all the 3 countries.
- In order to be added on the list, an establishment should submit a request to its competent authority and be inspected by its competent authority to confirm compliance with RF/CU requirements. The competent authority of the concerned Member State should then submit a request for the listing of the establishment to Rosselkhoznadzor, the RF CA.
- According to the Regulation on joint inspections of objects and sampling of goods subject to veterinary control, adopted by CU Decision No 834 of 18 October 2011 (provisions concerning audit will only enter into force on the date of Russia's accession to the WTO) the 3 ways to be listed are the following:
  - Audit/pre-listing. Equivalence assessment;
  - Listing based on guarantees / occasional inspections;
  - Listing based on systematic on-site inspections of the establishment.
- If a CU Party takes a decision to add an establishment to its national list, the other CU Parties have to accept this decision. Moreover, before completing the work on creating a common web-interface of the CU Commission's website, the three lists of establishments are valid for imports into the entire CU territory.

***You should liaise with your authorities to confirm which procedure is applicable.***

**THE PROCEDURE FOR ESTABLISHMENT APPROVAL**

All establishments interested in exporting meat to the RF/CU must be audited by the Competent Authority of your Member State to check the respect of the Russian/CU requirements and regulations established for the export into these countries, as well as for the provisions established in the export certificate.

The CA of the Member States may establish specific guidance for their services to audit the establishments exporting or willing to export to the RF/CU.

Example of guidance may concern:

- **Self-monitoring protocol:**
  - Trichinosis tests to be carried out by approved laboratories - for pork meat export;
  - Self-check for the observance of the microbiological criteria, for the residues and contaminants, etc.;

The frequency of sampling is to be discussed with the CA of your MS, taking into account the nature of exported products and their risks.

- **Example of documentation to be prepared for the official controls of the RF/CU inspectors:**
- The self-check plan concerning the observance of the microbiological criteria, of the residues and contaminants, stating the annual forecast for the samples to be taken, the techniques used for analysis, the qualification of the laboratories and the list of products that do not correspond to the Russian requirements;
- The results of the self-checks;
- Action plan in case of non-compliance with the rules.

- Example of reference documents for meat product inspection (automatic translation into English):

- From France:

- From Germany:

- Guideline for inspection of meat product (RF is supposed to adopt such a guideline, in the context of WTO accession. This former draft is not adopted.)

**PRE-NOTIFICATION BEFORE EXPORTING PRODUCTS BY SEA**

According to the Common Procedures of Veterinary Control in CU's Commission Decision No. 317 of the 18th of June 2010, when the controlled goods are imported by sea, pre-notification on actual shipment of the lots to the CU recipient is requested. (Legal text: http://ec.europa.eu/food/international/trade/docs/reg_vet_CU_border_en.pdf, 6.12.3 these rules being currently under revision)

According to the practical information provided by Rosselkhoznadzor, in 2010, regarding the way this procedure is implemented in Russia:

- It is the responsibility of the exporting establishment or of the exporter to assure that notification is provided;
- There is mandatory pre-notification for meat and meat products;
- Mandatory pre-notification for all destinations when exports use maritime transport to CU;
- The sender's e-mail should be known in advance;
- Pre-notification must be received at the address of competent authorities prior to arrival of the product in the CU;
- Pre-notification must contain the following information in a form: number of the veterinary certificate, date of creation, type of products, number and name of the manufacturer, receiving company in the CU (name of the CU consignee), weight, number of the container or name of the ship, etc.
- Pre-notification can be done every 10 or 15 days.
CHAPTER III

DO MY PRODUCTS NEED TO COMPLY WITH OTHER REGULATIONS FROM RF/CU?

- **AUTHORISED ADDITIVES:**
  
  When it comes to authorised additives it applies the Decision No. 299 of 28 May 2010 of the Customs Union Commission and in particular its Chapter II, section 22: Requirements for food additives and flavourings [en][ru][pdf].

- **PACKAGING:**
  
  It should be ensured that the materials in contact with food comply with the applicable requirements of the Decision No. 769 of 16 August 2011 of the Customs Union Commission: "Technical Regulation on Packaging Safety" that enters into force on the 1 July 2012 (see in particular Annex 1 for the criteria of safety for each type of packaging) (EN version with links) [ru].

- **LABELLING**
  
  According to the draft TR of the CU concerning Safety of meat and meat products, the consumer package of meat products shall contain the following information:
  
  - General information
    - Name of the Meat Products (including the thermal conditions and specific treatment of the product, i.e. "smoked", "cooled", "frozen");
    - Products' content: the meat and non-meat ingredients shall be provided in the order of decreasing the weight ratios of the ingredients;
    - Information about nutritional supplements, dietary supplements, flavours, food products of non-traditional composition, GMOs;
    - Data on nutrition value:
      - Indicate if >2% of the recommended daily allowance of proteins, fats, carbohydrates, or calories is included in a 100 g of product;
      - Indicate if a 100 g of product contains >5% of the daily recommended allowance of minerals or vitamins;
    - Production Date, Expiry Date;
    - Name and address of the manufacturer (seller);
    - Net weight and/or volume;
    - Conditions of storage;
    - Information on compliance approval;
    - Labelling with a unified circulation mark (EAC; Decision No 711 of the Customs Union Commission of 15 July, 2011)
      - EAC label shall be conducted before issuing the products for circulation into the CU territory.
      - EAC label shall attest its compliance with the requirements of all Technical regulations of the CU.
  - Additional information to be added:
    - The weight ratio of the main ingredients - for purées, filling, ham preserves, and meat porridges, etc.
    - Production date and packing date - for semi-finished products and culinary products.
    - Recommendations for cooking - for preserves, semi-finished products, culinary products requiring special treatment before usage.
- As far as it concerns the products with biotech (genetically modified material - GMM) components, in 2007, the amendments to the federal law on Protecting Consumer Rights and to SanPiN 2.3.2.1078-01, set a 0.9 % threshold for each biotech (GMM) component in food products as for mandatory labelling. For food products received from/or with the use of genetically modified organisms, the following shall be specified:
  - “The product contains live genetically modified microorganisms”- for products containing viable GMM;
  - “The product is obtained based on genetically modified microorganisms”- for products containing unviable GMM;
  - “The product has components that are obtained based on genetically modified microorganisms”- for products that are free from technological GMM or for products obtained based on components free from technological GMM.

- A product may be labelled “organic” only if it was produced, transported, stored, handled and distributed in accordance with the requirements.
- The labelling of dietary products, baby-food, and other special products shall meet special requirements stipulated for these products in SanPiN 2.3.2.1078-01.
- Feeds are not subject to labelling.

- The list of authorised GMMS is to be found in the Consolidated version of the SanPIN 2.3.2.1078-01 until amendment 24 dated 1.6.2011.

CHAPTER IV

AN INSPECTION/VISIT FROM THE RF/CU AUTHORITIES IS ANNOUNCED IN MY ESTABLISHMENT: WHAT SHOULD I KNOW?

- Cases foreseen for an inspection /visit (ref. to the inspection regulation)
- Which is the purpose of the visit? (audit purpose/ guarantee checking)
- What information should I be ready to provide? (Demonstration of knowledge and of how the RF/CU norms are taken into account: in self checks or procedures, for products considered eligible for export, measures taken to ensure traceability and segregation from other non eligible productions as appropriate).
- How is it going to take place? (ref. to inspection regulation)
- What measures should be taken during the visit/ inspection (corrective measures in case of non compliance, according to their severity)?
- Which is the role of the competent authorities of my country supervising my establishment? (Reports of official inspection/approval inspection to verify eligibility are expected to be available) Can the foreign inspectors check the application of EU norms?
- What are the obligations/ limits of competencies of the inspectors? (ref. to inspection regulation and WTO commitment).
- What are the possible consequences of an inspection? (ref inspection regulation and WTO WPR)
HOT LINES AND CONTACT POINT

As import requirements may change from time to time, exporters are advised to confirm requirements with their clients (their importers) prior to planning to export.

The RF created a system of hot-line consultation to guide foreign economic traders and businessmen. Information is posted on the official website of the Russian Government: http://government.ru/docs/11253/:

- Ministry of Economic Development of the Russian Federation: tel. +7-495-694-03-53
- Federal Custom Service for Russia: +7-495-204-57-28 (24 hours)
- Russian Federal Service for Consumer Rights Protection and Well-Being of Population (Rospotrebnadzor): 499 973-15-88 (Weekdays: from 10:00 AM to 6:00 PM)
- Russian Federal Service for Veterinary and Phytosanitary Surveillance - Rosselkhoznadzor (VPSS): +7-495 607 51 11
- Secretariat of the Customs Union Commission: +7-495-604-40-38
- Information pertaining to the Customs Union workings and other references: www.tsouz.ru
- The Federal Customs Service of Russia: http://www.customs.ru/ru/
- Rospotrebnadzor: http://www.rospotrebnadzor.ru/