



# Health & Consumer Protection Directorate-General

## GLOSSARY

3-MCPD	<i>3-monochloro-1, 2-propanediol is a contaminant resulting from a chemical reaction in processing, found particularly in soy sauce.</i>
ABP	<i>Animal by-products</i>
Acquis	<i>The Community acquis is the body of common rights and obligations which bind all the Member States together within the European Union.</i>
Active packaging	<i>Packaging which influences the packaged food by releasing or absorbing substances.</i>
Acute	<i>A term to describe a disorder or symptom that develops suddenly. It may or may not be severe.</i>
Adequate Control	<i>The level of controls whereby management has planned and organised the internal controls in a manner that provides reasonable assurance that the organisation's risks are managed effectively and that the organisation's goals and objectives will be achieved efficiently and economically.</i>
ADR	<i>Alternative Dispute Resolution: out-of-court dispute settlement mechanisms such as arbitration, conciliation and mediation.</i>
Adventitious presence	<i>The technically unavoidable presence of GM seeds in non-GM seed lots.</i>
AFC	<i>Panel on food additives, flavourings, processing aids and materials in contact with food.</i>
Aflatoxins	<i>Toxins caused by naturally occurring moulds resulting from poor storage conditions, often found in dried fruit and nuts.</i>
AHWC	<i>Panel on animal health and animal welfare.</i>
AI	<i>Avian Influenza: viral disease affecting poultry and other birds.</i>
AMP	<i>Annual Management Plan: translates the political priorities into concrete actions for a DG.</i>
Analytical limit of determination	<i>The minimum quantity of a certain substance that can be quantified with acceptable accuracy and precision.</i>
Annual Work Programme	<i>Document that defines priorities for action, breakdown of the annual budget, timing of the execution of actions, as well as the criteria and amounts available for calls for grant proposals in the coming year.</i>
Antimicrobial Resistance	<i>The fact that micro-organisms are becoming resistant to antibiotics.</i>
APS	<i>Annual Policy Strategy: the Commission's political priorities and the orientation for the human and financial resources for year n+1.</i>
ASF	<i>African swine fever: highly contagious viral disease affecting pigs and other swine.</i>
Assurance	<i>The Head of Internal Audit's professional opinion, given to the Management at least once a year, on the adequacy, effectiveness and reliability of the DG's/Commission's internal control system.</i>

Audit	<i>Independent review and examination of records and activities to assess the adequacy of system controls, to ensure compliance with established policies and operational procedures, and to recommend necessary changes in controls, policies, or procedures.</i>
Audit charter	<i>A formal written document that defines the internal audit activity's purpose, authority, and responsibility.</i>
Audit cycle	<i>The length of time over which all systems in the agreed audit needs assessment will be audited.</i>
Audit programme	<i>A detailed plan for the direction and control of an individual audit assignment</i>
Auditnet	<i>A network of the Heads of the LACs (Internal Audit Capability) and of the Head of the LAS (Internal Audit Service), chaired by the LAS, with the purpose of exchanging best practice and discussing questions of mutual interest.</i>
BICHAT	<i>Biological and CHEmical Agent ATtacks network connects the Commission and the Member States for the rapid exchange of secure information related to events caused by the deliberate release of biological and chemical agents..</i>
Bio-diesel	<i>Carburant made from animal or plant origin.</i>
Bio-fertiliser	<i>Fertiliser for crops, obtained from animal by-products (e.g. manure, residues of composting).</i>
Biogas	<i>Gas obtained after composting animal by-products.</i>
BIOHAZ	<i>Panel on biological hazards (including TSE/BSE).</i>
Blood components	<i>The therapeutic constituents of blood (red cells, white cells, platelets, plasma).</i>
Blood derivatives	<i>The blood components or the manufactured medicinal products derived from blood and plasma such as clotting factor concentrates.</i>
Breeding for resistance	<i>Selection of animals resistant to a certain disease.</i>
BSE	<i>Bovine Spongiform Encephalopathy is one of a group of diseases known as transmissible spongiform encephalopathies, or TSEs, which are caused by the build-up of abnormal prion proteins in the brain and central nervous system</i>
BT	<i>Bluetongue: disease affecting sheep, cattle and other ruminants.</i>
Call for proposals	<i>Public procedure informing interested parties of opportunities and conditions for obtaining grants.</i>
Call for tender	<i>Public procurement procedure for the acquisition of goods or services by the Commission.</i>
Campylobacteriosis	<i>Disease caused by a micro-organism called "Campylobacter" which provokes gastro-intestinal disorder.</i>
Cannibalism	<i>Feeding of proteins from a species to the same species (e.g. ruminant protein given to ruminants).</i>
Capacity building	<i>Actions to strengthen skills, expertise of consumer organisations.</i>
Catering waste (swill)	<i>Waste from kitchens (restaurants etc.) including used cooking oil.</i>
CFS	<i>Central Financial Service.</i>
Chronic	<i>A term describing a disorder or set of symptoms that has persisted for a long time.</i>
Citrus canker	<i>Disease caused by a bacterium, mainly affecting citrus fruit with damaging effects.</i>
CJD	<i>Creutzfeldt-Jakob disease. A new variant of this disease, known since the beginning of the 20th century in its classical form, was identified in 1996 in relation to BSE.</i>

Clearing House	<i>The contact point of the European Extra-Judicial Network in each Member State as well as Norway and Iceland.</i>
CLWP	<i>Commission Legislative and Work Programme: an annual document, adopted by the College, which includes all the main initiatives which are politically meaningful for the College.</i>
Cohort	<i>Animals born or raised together.</i>
Common Catalogue of Varieties	<i>A Community list of all varieties the seeds of which are not subject, in principal, to marketing restrictions relating to the variety.</i>
Common Frame of Reference (CFR)	<i>Compilation of principles, definitions and model rules, covering the area of general contract law and some specific contracts.</i>
Common position	<i>A formal agreement on a legislative instrument in the Council of Ministers, under Article 251 of the Treaty, and constituting the end of first reading of the co-decision procedure.</i>
Community Reference Laboratory	<i>Laboratory appointed by Commission Decision and responsible for developing testing methods for the detection of infections or contaminations.</i>
Competent authority	<i>The authority of a Member State responsible for the implementation and enforcement of feed law, food law, animal health and animal welfare rules by feed and food business operators.</i>
Competitiveness	<i>The "economic" pillar in the Lisbon strategy. The main challenge in the Lisbon strategy is to realise the Union's economic growth potential (competitiveness).</i>
Compliance	<i>The ability to reasonably ensure conformity and adherence to organisation policies, plans, procedures, laws, regulations and contracts.</i>
Consumer	<i>Any natural person who is acting for purposes which are outside his trade, business, craft or profession.</i>
Consumer safety	<i>The health and physical safety aspects related to products and services supplied to or otherwise used by consumers.</i>
Consumer satisfaction indicators	<i>Indicators geared towards consumer policy makers (and enforcers) and consumers, rather than businesses, which should allow overall consumer satisfaction levels to be measured and, the specific elements which determine (dis-)satisfaction levels in individual areas.</i>
CONTAM	<i>Panel on contaminants in the food chain.</i>
Contingency plan	<i>Plan prescribing measures to be implemented in case of an emergency.</i>
Control	<i>Any action taken by management and other parties to enhance risk management and increase the likelihood that established objectives and goals will be achieved.</i>
Control Environment	<i>The attitude and actions of the board and management regarding the significance of control within the organisation.</i>
CSF	<i>Classical Swine Fever, a highly contagious viral disease affecting pigs and wild boar.</i>
CWD	<i>Chronic Wasting Disease: a TSE affecting deer and other cervids.</i>
De minimis labelling thresholds	<i>Thresholds below which the GM adventitious presence in non GM does not need to be labelled.</i>
Dietetic foods	<i>Foods intended to satisfy particular nutritional requirements of specific groups of the population are called "foods for particular nutritional uses", "dietetic foods" or "dietary foods", which may sometimes be referred to as "PARNUTS" foods.</i>
Differential testing	<i>Test to differentiate between different diseases.</i>

ECDC	<i>European Centre for Disease Prevention and Control. A centre to help coordinate national centres for monitoring and responding to health threats. To be established in Stockholm by 20 May 2005.</i>
e-commerce	<i>Business that is conducted over the Internet using any of the applications that rely on the Internet, such as e-mail, instant messaging, shopping carts and Web services. Electronic commerce can be between two businesses (B2B) transmitting funds, goods, services and/or data or between a business and a customer (B2C).</i>
Economy	<i>Minimising the cost of resources used for an activity, whilst ensuring appropriate quality.</i>
EEA	<i>The European Economic Area (Liechtenstein, Norway, Iceland)</i>
EEJ-NET	<i>European Extra-Judicial Network: a network helping consumers to access extra-judicial conflict resolution systems in other EU countries.</i>
Effectiveness	<i>The extent to which the objectives of an activity are achieved and the relationship between the intended and actual impact of an activity.</i>
Efficiency	<i>The relationship between output in terms of goods, services or other results, and the input: resources consumed or needed.</i>
EFSA	<i>European Food Safety Authority. Independent body that provides assistance and scientific advice concerning risk assessment and risk analysis to the Commission, European Parliament and the Member States.</i>
EFTA	<i>The European Free Trade Organisation (Switzerland, Liechtenstein, Norway, Iceland).</i>
Electromagnetic fields (EMF)	<i>Radiations which occur in nature or through man-made initiatives, created by electric and magnetic fields.</i>
EMEA	<i>European Medicines Evaluation Agency, based in London, which plays a key role in the central authorisation of pharmaceuticals.</i>
Empowered consumers	<i>Consumers who have the necessary tools to play their role to the full in the retail Internal Market so that their transactions best meet their needs. These tools are both of a legislative and non legislative nature.</i>
EU Health Forum	<i>A consultative mechanism bringing together umbrella organisations representing stakeholders in the health sector. It comprises the Health Policy Forum, the Open Forum and the Virtual Forum.</i>
EU Health Portal	<i>An Internet based gateway to health information on health across Europe, currently being developed.</i>
Eurobarometer	<i>Opinion polls, established in 1973. Surveys consist of approximately 1000 face-to-face interviews per Member State (except Germany: 2000, Luxembourg: 600, United Kingdom 1300 including 300 in Northern Ireland). Reports are sector-specific or of a general nature.</i>
Euroguichet	<i>Also referred to as the Euroguichet network (or European Consumer Centres Network). Network informing and advising consumers in relation to cross border shopping problems.</i>
Evaluation	<i>A judgement of interventions according to their results, impacts and the needs they aim to satisfy.</i>
EWRS	<i>The Early Warning and Response System in the field of communicable diseases.</i>
External auditor	<i>An auditor whose main function is to give an opinion on financial statements over a specified period.</i>
FEEDAP	<i>Panel on additives and products or substances used in animal feed.</i>

Financial guarantees	<i>In the feed sector – guarantees made by the feed business operator in order to cover the costs of withdrawal and or destruction of contaminated feed, following a decision by the competent authority.</i>
Financial Services	<i>Includes any service of a banking, credit, insurance, personal pension, investment or payment nature.</i>
FIN-USE	<i>A forum of experts set up to improve input into the definition of EU financial services policy from the perspective of certain users, namely consumers and small and medium-sized businesses.</i>
First/second EP reading	<i>Steps in the co-decision procedure where EP adopts an opinion on a Commission proposal at the plenary session.</i>
FMD	<i>Foot and Mouth Disease, a highly contagious viral disease affecting cattle, pigs, sheep and other cloven-hoofed animals.</i>
Food additives	<i>Substances added intentionally to food to perform certain technological functions, for example to colour, to sweeten or to preserve.</i>
Food contact materials	<i>Food packaging, processing machines, tableware, etc.</i>
Food supplements:	<i>Concentrated sources of nutrients or other substances with a nutritional or physiological effect whose purpose is to supplement the intake of nutrients in the normal diet.</i>
Framework Convention on Tobacco Control (FCTC)	<i>A convention aimed at combating tobacco use worldwide and addressing its negative impact on health, adopted in May 2003 by all the members of the World Health Organisation. The European Community signed in June 2003 and is now ready to ratify.</i>
Full harmonisation	<i>Where a piece of EU legislation harmonises (unifies) the laws of Member States on a maximum basis, preventing Member States from adding more restrictive provisions.</i>
FVO	<i>Food and Veterinary Office – Directorate F of DG SANCO located in Grange (Ireland) responsible for verification of the implementation of Community food safety legislation in the Member States and in third countries.</i>
G10 process	<i>The European Union High Level Group on Innovation and Provision of Medicines. The process came to an end in June 2004.</i>
GBR	<i>Working group on geographical BSE risk (Geographical BSE Risk Assessment).</i>
Global Health Security Network	<i>This network is made up of senior representatives of the G7<sup>A</sup> member countries who coordinate the work of the Global Health Security Initiative.</i>
GM food and feed	<i>Food or feed consisting of, containing, or produced from genetically modified organisms.</i>
GMO	<i>Genetically modified organism.</i>
GPSD	<i>General Product Safety Directive: a horizontal regulatory framework for non-food consumer product safety first adopted in 1992 and substantially reinforced in January 2004.</i>
Green paper	<i>Document intended to stimulate debate and launch a process of consultation at European level on a particular topic (such as consumer protection, the single currency, tele-communications).</i>
HACCP	<i>Hazard Analysis Critical Control Points – system to prevent contamination of food/feed, to be implemented by food/feed business operators.</i>
Harmful organisms	<i>Organisms (e.g. insects, fungi, virus, bacteria) which are either not present in the Community or, if present, not widespread and under official control.</i>

Health Determinants	<i>Factors which influence health directly (causal link e.g. tobacco on lung cancer) or indirectly (e.g. socio-economic factors). Some of these factors cause ill-health (risk factors) and some are conducive to good health (preventive factors e.g. physical activity).</i>
Health Impact Assessment	<i>A mechanism of systematically assessing the potential effects of a proposal or policy on population health.</i>
Health Policy Forum	<i>Part of the EU Health Forum, this group brings together the main umbrella bodies in the health field to advise the Commission on policy development.</i>
Health Security Committee	<i>Committee, created in 2001, which brings together high-level representatives of Health Ministers to co-operate in countering deliberate releases of biological and chemical agents.</i>
Healthy Life years	<i>Indicator to monitor health by measuring the number of years which a person of a certain age can expect to live in a good health based on health survey data.</i>
High Level Committee on Health	<i>High level committee of Member State officials set up in 1991 to advise the Commission services on health issues.</i>
High Level Group on Health Services and Medical Care	<i>Group bringing together senior officials from EU Health Ministries to facilitate co-operation at European level by identifying shared priorities and exchanging best practice. The first meeting was held on 1 July 2004.</i>
HPAI	<i>High Pathogenic Avian Influenza, a serious and highly contagious poultry disease.</i>
IAC	<i>Internal Audit Capability – an audit function embedded in a Directorate General.</i>
IAS	<i>Internal Audit Service – a separate Directorate General, reporting to the College.</i>
ICS	<i>Internal Control Standards – a set of 24 standards specifying the minimum internal control requirements to be met in the Directorates General.</i>
IHR	<i>International health regulations, under the auspices of WHO, aiming to help co-ordinate response to specific infectious diseases by means of notification and other procedures.</i>
Impact assessment	<i>Process of identifying the future economic, social and environmental consequences of a current or proposed legal document.</i>
Integration	<i>Political process, based on article 153 of the Treaty, in which DG SANCO seeks to promote consumer rights in other European Union policies such as Internal Market, Competition, Services of General Interest.</i>
Intelligent packaging	<i>Packaging which monitors and gives information on the condition of food it contains.</i>
Internal auditing	<i>Independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.</i>
Internal control	<p><i>Process, effected by an entity's board of directors, management and other personnel, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:</i></p> <ul style="list-style-type: none"> <li>• <i>Effectiveness and efficiency of operations;</i></li> <li>• <i>Reliability of financial reporting;</i></li> <li>• <i>Compliance with applicable laws and regulations.</i></li> </ul>
Internal control system	<i>The whole network of systems established in an organisation to ensure that its objectives are achieved and in the most economic and efficient manner.</i>

Inter-service Group	<i>A group composed of representatives from various Commission services set up by a specific Commission service in order to discuss and brainstorm on a given issue. The ultimate purpose of an Interservice Group is to know the respective positions, whether offensive or defensive, and exchange views towards mutually supportive policy making.</i>
Interservice Group on Health	<i>Internal co-ordination group between the different services of the Commission to oversee work on health, chaired by DG SANCO.</i>
Intra-species recycling	<i>Cannibalism – feeding of proteins from a species to the same species.</i>
IPPC	<i>International Plant Protection Convention: multilateral Treaty deposited with the Director General of FAO, adopted in 1951.</i>
Joint actions	<i>Actions co-financed with the Member States.</i>
JRC	<i>Joint Research Centre (Community Reference Laboratory for feed).</i>
Liberalisation	<i>Process aimed at opening-up a market towards more competition. Liberalisation can be accompanied by regulatory safeguards, in order to protect specific interests, such as consumer rights. An example is the universal service obligation.</i>
Lisbon Strategy	<i>Political process aimed at making the European economy “the most competitive and dynamic knowledge-based economy in the world, capable of sustainable economic growth with more and better jobs and greater cohesion”. In March 2000, the Lisbon European Council launched the Union’s decade-long strategy for economic, social and environmental renewal: the “Lisbon strategy”.</i>
Listeriosis	<i>Disease caused by a micro-organism called “Listeria monocytogenes”; may provoke abortion and meningitis.</i>
LPAI	<i>Low Pathogenic Avian Influenza, a poultry disease, causing few or no clinical signs in infected birds.</i>
Marine biotoxin	<i>Toxin produced by marine algae and concentrated by shellfish.</i>
Material Transfer Agreement	<i>Under the International Treaty: legally binding agreement between the provider and the recipient of genetic resources, specifying the recipient’s obligation with regard to sharing of commercial benefits, patenting of material, etc.</i>
Materiality	<i>Any condition that has caused or is likely to cause errors, omissions, fraud or other adversities of such magnitude as to force senior managers to undertake immediate corrective actions to mitigate the associated risk and possible consequent damages to the organisation.</i>
Minimum harmonisation	<i>Where a piece of EU legislation harmonises the laws of Member States on a minimum basis, giving them the possibility to maintain or introduce stricter provisions in order to protect consumers.</i>
Mortgage credit	<i>Credit secured by a mortgage on immovable property (or by a similar surety commonly used in Member States).</i>
MRL	<i>Maximum residue limit.</i>
ND	<i>Newcastle Disease: a viral disease affecting poultry and other birds.</i>
NDA	<i>Panel on dietetic products, nutrition and allergies.</i>
Nitrates/nitrites	<i>Chemical substances used as food additives for preservation. Their transformation products are nitrosamines which are cancer causing agents.</i>
Novel foods	<i>Foods and food ingredients that have not been used for human consumption to a significant degree within the Community before 15 May 1997.</i>

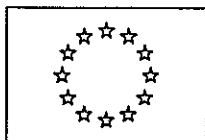
Nutrient Profiles	<i>Concept according to which food with a high content of certain nutrients (fat, sugar, salt) would not be allowed to bear any nutrition or health claim.</i>
Obesity, overweight	<i>The prevalence of overweight and obesity is commonly assessed by using the Body Mass Index (BMI), defined as kg/m<sup>2</sup> (weight in kg divided by the square of the height in m). A BMI over 25 is defined as overweight, and a BMI of over 30 as obese.</i>
OECD	<i>Organisation for European Co-operation and Development.</i>
OFFC	<i>Official feed and food controls: new legislation on general rules for official controls of all feed, food and live animals, from farm to fork.</i>
Oleo-Chemicals	<i>Oils obtained from animal by-products.</i>
Open declaration of feed ingredients	<i>Indication of the exact percentage of each ingredient in feed (with a tolerance of plus or minus 15%).</i>
Open Health Forum	<i>An annual event bringing together a wide range of stakeholders under the framework of the EU Health Forum.</i>
Operating grants	<i>Grants co-financing the day-to-day functioning of EU level consumer organisations.</i>
Operational support	<i>Subsidies to support the functioning of European consumer organisations.</i>
Optional Instrument	<i>Possible future EC regulation in the area of contract law, containing rules on general contract law and certain specific contracts. If the contracting parties expressly chose to apply the Optional Instrument (a so-called "Opt-In" approach), the contract would be entirely governed by this EC instrument.</i>
Output measure	<i>A directly quantifiable means of assessing what is produced or achieved.</i>
PAH	<i>Polycyclic Aromatic Hydrocarbons: contaminants resulting from incomplete combustion at processing. These substances, present in smoked food, fats and oils, may cause cancer.</i>
Payments	<i>A "payment transaction" is a movement of funds. It is made on the basis of a payment order from a payer (the legal or natural person having the right to dispose of the funds) that funds should be transferred to a payee (the final recipient).</i>
PCB	<i>Polychlorinated biphenyls; a family of chemical substances very persistent in the environment which give rise to various toxic effects.</i>
Performance indicator	<i>An indirect measure of the extent to which effectiveness, efficiency and economy, quality and service levels have been achieved in an activity or function. Normally used where direct measures are not available.</i>
Pesticides	<i>Products containing chemical substances or micro-organisms used to control harmful organisms or undesirable weeds.</i>
Phthalates	<i>A family of chemicals, covering dozens of substances, showing different types and levels of toxicity. The most used are DINP and DEHP. Their most important use is as softeners (plasticizers) in PVC. Some phthalates are also used in cosmetics. The use of six phthalates in certain toys was banned by a Commission Decision in 1999 due to their toxicity.</i>
Phytosanitary	<i>Pertaining to plant quarantine, with the aim of preventing the introduction and/or spread of harmful organisms.</i>
Plant genetic resources for food and agriculture	<i>Whole plants or parts of plants (e.g. genes) that can be used as source material for the breeding of agricultural crops.</i>
Plant passport	<i>Document to show that a given plant or plant product, moved within the Community, meets the required plant health standards.</i>



Plant variety right	<i>The grant of a plant variety right gives the owner the exclusive right to produce for sale and to sell reproductive material of the variety concerned. A variety that is the subject of a plant variety right is referred to as a "protected variety".</i>
Potato brown rot	<i>Disease caused by a bacterium which is very damaging to potatoes and which can be spread via contact, potatoes and water.</i>
PQs	<i>Parliamentary Questions tabled by Members of the European Parliament.</i>
PPR	<i>Panel on plant health and plant protection products.</i>
Precautionary Principle	<i>Principle that enables risk managers to take measures to protect consumers without precise knowledge of the risk, assuming a worst case scenario for the risk assessment. Applying the PP can be justified where the risk cannot exactly be known or where data fail to be submitted by data providers.</i>
Previous cropping (requirements)	<i>The previous cropping history of a field should be such that the risk of undesirable volunteer plants of the same or related species contaminating the seed crop is reduced to a minimum.</i>
Prion	<i>Infectious agent (abnormal protein) which is the source of spongiform encephalopathy.</i>
Processed animal protein	<i>Parts of animals that are processed e.g. fish meal, meat and bone meal, blood meal.</i>
Project Grants	<i>Grants co-financing the execution of projects by organisations eligible for such grants.</i>
Qualitative study (or "focus group")	<i>The qualitative studies investigate in-depth the motivations, the feelings, the reactions of selected social groups towards a given subject or concept, by listening and analysing their way of expressing themselves in discussion groups (or "focus groups") of around 10 people of a given socio-economic segment or with non-directive interviews.</i>
Quality assurance	<i>A combination of internal and external reviews to provide reasonable evidence that audit work conforms to standards and best practices.</i>
RASFF	<i>Rapid alert system for food and feed – the EU network for exchange of information on measures taken with respect to food and feed presenting a risk to the consumer (withdrawal, recall, rejection at border, etc).</i>
REACH	<i>A new system to regulate chemicals, proposed by the Commission in 2003, which would replace the existing Community legislation on chemical substances. REACH stands for Registration, Evaluation, Authorisation of Chemicals.</i>
Residues of veterinary medicinal product	<i>Medicinal substances and their transformation products which remain in the animal and its produce (meat, milk, eggs, etc) following treatment; these levels decrease with time after the end of treatment.</i>
Retail financial services	<i>Primarily aimed at consumers, these cover bank and postal giro accounts, credit (mortgage credit and consumer credit whether linked to purchase of a specific product or not) life and non-life insurance, retirement or pension plans, investment services and payments (in cash but also by cards, transfers and direct debit).</i>
Risk	<i>The possibility of an event occurring (or of an anticipated event not occurring) that would cause harm, damage, losses, injuries or other undesired consequences or have a negative impact on the achievement of objectives. Risk is measured in terms of consequences and likelihood.</i>
Risk assessment	<i>A procedure intended to systematically evaluate qualitatively or quantitatively the level of a risk, by examining the intrinsic danger, the level of exposure and likelihood of an adverse outcome.</i>
Risk elements	<i>The factors to be quantified in determining risk and materiality in audit planning.</i>

Risk management	<i>A process of balancing the potential of an adverse outcome against the cost of resources allocated to reduce the outcome. The setting of a risk profile and of managing risk is a management responsibility.</i>
Rome I	<i>Convention of 1980 on the law applicable to contractual obligations, signed under the auspices of the European Economic Community.</i>
Rome II	<i>Draft Community instrument on the law applicable to non-contractual obligations.</i>
Salmonella serotype	<i>A particular type of salmonella identified on the basis of serological tests.</i>
Salmonellosis	<i>Disease caused by a micro-organism called "Salmonella" and provoking symptoms such as diarrhoea and vomiting.</i>
SARS	<i>Severe Acute Respiratory Syndrome.</i>
Seed	<i>Parts of plants used for sowing or planting. Contrasted to grain, for example, used for human or animal consumption.</i>
Seed germination	<i>The emergence and development from the seed embryo of those essential structures which, for the kind of seed in question, are indicative of the ability to produce a normal plant under favourable conditions.</i>
Seed marketing	<i>The act of selling seed and all acts preparatory thereto.</i>
Services of general interest (SGI)	<i>Essential services such as network services (telecommunications, electricity, gas), postal services, transport services, water supply as well as health or social services. SGI covers both market and non-market services which the public authorities class as being of general interest and subject to specific public service obligation.</i>
Spongiform encephalopathy	<i>Disease creating gaps (like a sponge) within the brain.</i>
Spring Report	<i>Yearly report, prepared by the Commission, that assesses the achievement of the Lisbon strategy.</i>
Standards	<i>Detailed technical specifications established by international, European or national standardisation bodies. Standards are normally voluntary, but largely used to support the application of mandatory requirements set out by Community legislation. Standards may cover safety aspects, quality or other aspects such as management systems.</i>
Standard seed	<i>Seed which satisfies certain standards with regard to identity and purity and which is subject to official inspection.</i>
Standard Terms and Conditions (STC):	<i>Contract clauses that have been pre-formulated by one party in order to be used for a multitude of contracts in the future with clients, rather than having to start again each time.</i>
Standardisation body	<i>A technical body whose activity is to elaborate and adopt standards. Standardisation bodies are private organisations.</i>
Structural indicators	<i>Tools measuring the economic situation, in all its components (functioning of the markets, inflation rates, business climate) on a permanent basis. These contrast with conjuncture indicators that measure the same economic aspects at a specific, limited in time, moment. Achievement of the competitiveness objective is measured by structural indicators in the Commission Spring report</i>
Sudan red	<i>An industrial dye not authorised for use in foodstuffs.</i>
Systems weakness	<i>Insufficient internal control to ensure that system objectives will be achieved.</i>
TB	<i>Tuberculosis, a disease found notably in cattle, which can be transmitted to humans.</i>

Tissue establishment	<i>A tissue bank or a unit of a hospital or other body where activities of processing, preservation, storage or distribution of human tissues and cells are undertaken. It may also be responsible for procurement or testing of tissues and cells.</i>
Tobacco Fund	<i>The "Community fund for tobacco research and information" is financed through a levy on the subvention granted for the production of raw tobacco within the framework of the Common Agricultural Policy. The budget of the Fund is divided in two equal parts: 50% managed by SANCO used to fund information programmes, such as the "feel-free to say no" tobacco prevention campaign, and 50% managed by AGRI used to finance measures to promote a shift from tobacco production to other crops.</i>  <i>In 2004 the tobacco fund corresponds to a levy of 3%, amounting to a total budget of 28.8 M€ (14.4 M€ for SANCO activities).</i>
Traceability	<i>The ability to trace and follow food, feed, and ingredients through all stages of production, processing and distribution.</i>
Trichinella	<i>Parasite which may be found in pigmeat, and horsemeat, and which provokes illness in humans.</i>
Trustmark	<i>A trustmark (logo or seal) is a verification mark for online trust, confidence and basic due diligence in e-commerce. It verifies the existence of a company in the real world, confirms that it has a valid business license in its jurisdiction and identifies who the principals are. It may cover data privacy and/or financial transaction issues.</i>
TSE	<i>Transmissible Spongiform Encephalopathies: family of diseases covering BSE, CWD, scrapie and vCJD.</i>
Universal service	<i>Concept used in the area of services of general interest. Universal service establishes the right of everyone to access certain services considered as essential and imposes obligations on service providers to offer defined services according to specified conditions, including complete territorial coverage and at an affordable price. Currently included in legislation for electronic communications, electricity and postal services.</i>
Upper Levels of vitamins and minerals	<i>Upper levels of daily intakes of individual vitamins and minerals that are not likely to have adverse effects on health.</i>
Varietal of identity of seed crop (control of)	<i>A check to ensure that the seed crop shows the characteristics of the variety which it claims to be.</i>
Variante Creutzfeldt Jakob Disease	<i>A form of Creutzfeldt-Jakob disease – one of a group of diseases classified as transmissible spongiform encephalopathies (TSEs) that are characterised by degeneration of the nervous system and are invariably fatal. Although the precise nature of the causative agent is not known, research indicates that vCJD is linked, probably through food, to a TSE of cattle called Bovine Spongiform Encephalopathy (BSE).</i>
Variety	<i>Plant grouping defined by the expression of their characteristics, distinguished from any other plant grouping by the expression of at least one of the characteristics.</i>
White Paper on Food Safety	<i>Policy paper developed by DG SANCO in 1999, following a number of food crises, to develop a new food safety strategy.</i>
WHO	<i>World Health Organization. Headquarters in Geneva. Director General, Dr Lee. Regional office in Copenhagen. Regional Director, Dr Danzon.</i>
Zoonoses	<i>Diseases transmissible from animals to humans either directly or through food.</i>



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL  
HUMAN RESOURCES AND SECURITY  
Directorate HR.B : Career  
Recruitment and End of Service  
Head of Unit

Brussels, 13/12/11

**E.C.N.E.P.T.P.**

**European commission  
National Experts in Professional Training Programme**

**Certificate of end of training**

Issued to Mrs Yen-Chi TUNG

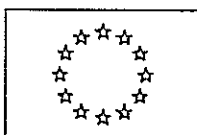
who was in professional training at the European Commission during the period

from 01/09/2011 to 30/11/2011

within DG SANCO



Roberto CARLINI  
Head of Unit



EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Veterinary and International affairs  
EU-SPS relations with the Custom Union between Russia, Belarus and Kazakhstan  
Head of the Task Force

Brussels, 20 SEP. 2011  
SANCO G7/CC/mh D(2011)

Dear Mr Sadvakasov, dear Mr Glazyev,

Following our letter Ref. Ares(2011)931229 of 01/09/2011, we would like to submit the following first comments on the draft Customs Union Technical Regulation on food additives, flavourings and processing aids. Further EU comments might be submitted subsequently.

As regards article 2 on definitions, we note that no definition of "flavouring preparation" is included, although the term is later used in article 6. We would suggest adopting a definition in line with that defined in article 16 of Regulation (EC) No 1334/2008, which can be consulted at the following webpage: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0034:0050:EN:PDF>.

Furthermore, the definition of "according to the technical documents (according to the TD)" does not seem appropriate since it refers only to cases where "residual quantities are significantly lower than the established level or when processing aids are removed in the course of technological process and may not be evaluated by modern surveying techniques" while the mention "according to TD" is indicated where there are no level established. We therefore request a modification of this definition to cover cases where no maximum level is established in the Technical Regulation, and where additives and processing aids shall be used in accordance with good manufacturing practice, at a level not higher than is necessary to achieve the intended purpose and provided that they do not mislead the consumer. This would thus correspond to the EU notion of "*quantum satis*". This approach would be consistent with the notion of "good manufacturing practice" used in the *Codex Alimentarius* General Standard for Food Additives (CODEX STAN 192-1995, point 3.3).

Other comments regarding the Annexes of the draft Technical Regulation are included in bold in attachment to this letter.

Yours sincerely,

Paul van Geldorp

Enclosure: List of destinees;  
EU comments on the draft CU TR on food additives, flavourings  
and processing aids.

List of destinees:

Mr S. Glazyev  
Executive Secretary  
Commission of the Customs Union  
Eurasian Economic Community  
Smolensky blvd 3/5  
119121 Moscow  
Russian Federation

N.O. Sadvakasov  
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Department for technical regulation,  
veterinary, sanitary and phytosanitary matters,  
Commission of the Customs Union  
Eurasian Economic Community  
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Russian Federation

EU comments are included in the appendix in bold.

NB: Only the annexes where the EU has comments are included here. When the EU comments relate to an entire annex, the content of the annex is not reproduced.

Annex 1  
to the technical regulations

### SAFETY REQUIREMENTS FOR FLAVOURINGS

1. Content of toxic elements in a flavouring shall not exceed the following values:

plumbum- 5,0 mg/kg; cadmium- 1,0 mg/kg;

arsenic- 3,0 mg/kg; mercuric- 1,0 mg/kg;

2. Fumatory flavourings shall meet the following requirements:

1) content of benz(a)pyrene shall not exceed 2 mcg/kg (l); **The EU requests an harmonisation with the EU requirement, which is 10 mcg/kg The EU level is based on the recommendation of Scientific Committee on Food' (See Reports of the Scientific Committee for Food, 34th series, pp. 1 to 7: [http://ec.europa.eu/food/fs/sc/scf/reports/scf\\_reports\\_34.pdf](http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_34.pdf)).**

2) content of benz(a)anthracene shall not exceed 20 mcg/kg (l);

3) content of smoking flavouring agents in benz(a)pyrene in food products shall not exceed 0,03 mcg/kg (l); **In the EU, it was considered not necessary to set both a maximum level for the smoke flavouring and for the final product, since the maximum level for the smoke flavouring also covers smoke flavouring. The EU requests that a similar approach is followed in the Customs Union.**

3. According to microbiological figures-flavouring agents shall meet the following requirements:

Types of flavourings	Moulds, CFU/g not more than	Weight of product, in which are not allowed, g		Moulds, CFU/g not more than	Yeast, CFU/g, no more than	Notes
		Coliform bacteria (coliforms)	Pathogenic, including salmonella			
Liquid and pasty water-based flavouring agents <sup>1</sup>	$5 \times 10^2$	1.0	25	100		moulds and yeast, in total
Dry flavouring agents based on sugars, gums, salts and other products	$5 \times 10^3$	0.1	25	100	100	
Dry flavouring agents based on starch and spices	$5 \times 10^5$	0.01	25	500	100	for spices - sulphite-reducing clostridia are not allowed in 0,01 g

Note: <sup>1</sup> - except for water solutions with the content of ethyl alcohol or propylene glycol not more than 15%.

In the EU it was not considered necessary to set both heavy metals limits for flavourings and for the final products, since any contribution from flavourings is covered when setting the limits for the final products. The EU requests that a similar approach is followed in the Custom Union. The same applies for microbiological criteria.

THE LIST OF FOOD ADDITIVES, PERMITTED FOR USING  
IN THE FOOD PRODUCTS MANUFACTURE

In this text authorisations are listed according to the additive and not the food categories as in Annex II of Regulation (EC) No 1333/2008 or in *Codex Alimentarius* standards, which makes an assessment difficult to be carried out within the deadlines. The EU requests tables of correspondence with *Codex Alimentarius* General Standards for Food Additives (CODEX STAN 192-1995).



HYGIENIC REGULATIONS OF TASTE AND  
FLAVOUR BOOSTERS USE

Food additive (E index)	Food products	Maximum level in products
Aspartame (E951) <sup>1</sup>	Chewing gum with sugar	2,5 g/kg
	See Annex No.13	
Acesulfame potassium (E950) <sup>1</sup>	Chewing gum with sugar	800 mg/kg
	See Annex No.13	
Zinc acetate (E650)	Chewing gum	1 g/kg
Glycine and its sodium salt (E640)	According to the TD <b>Please see comments on the definition of "according to TD"</b>	according to the TD
Glutamic acid (E620) and its salts: ammonium glutamate (E624), potassium glutamate (E622), calcium glutamate (E623), magnesium glutamate (E625), sodium glutamate (E621)- separately or in combination, in terms of glutamic acid	Food products	10 g/kg
	Seasoning and spices	according to the TD <b>Please see comments on the definition of "according to TD"</b>
Guanylic acid (E626), potassium guanylate (E628), calcium guanylate (E629), sodium guanylate (E627), inosinic acid (E630) potassium inosinate (E632), calcium inosinate (E633), sodium inosinate (E631), calcium 5'-ribonucleotides (E634), disodium 5' -ribonucleotides (E635)- separately or in combination for guanylates and inosinates - in terms of corresponding acid	Food products	500 mg/kg
	Seasoning and spices	according to the TD <b>Please see comments on the definition of "according to TD"</b>
Carbamide (E927b, urea)	Chewing gum without sugar	30 g/kg
	See Annex No.5	
Maltol (E636), ethyl maltol (E637)	Flavouring agents	according to the TD
Neohesperidine dihydrochalcone (E959) <sup>1</sup>	Chewing gum with sugar	150 mg/kg
	Spreads and margarines	5 mg/kg
	Meat products	5 mg/kg
	Fruit jelly (marmalade)	5 mg/kg
	Vegetable albumens	5 mg/kg
	See Annex No.13	
Neotame (E961)	Flavoured soft drinks; water-based, based on fruit juices, milk and milk products without sugar or with low-calories content	2 mkg/l
	"Snacks": flavoured and ready-to-use, packed, dry, spicy, starch-containing products and nuts with coating;	2 mkg/l
	Confectionery products with starch with low- calories content or without sugar	3 mkg/l
	Micro-lollipops for breath refreshing without sugar;	3 mkg/l
	Flavoured pastils (for throats) without sugar;	3 mkg/l

	Chewing gum with sugar;	3 mkg/l
	Jams, jellies, marmalade with low-calories content	2 mkg/l
	Sauces	2 mkg/l
	Dietary supplements (liquid and powdered); Dietary supplements: vitamins and minerals in the form of syrups and chewing pills	2 mkg/l
Thaumatococcus (E957) <sup>1</sup>	Chewing gum with sugar	10 mg/kg
	Desserts	5 mg/kg
	Soft flavoured drinks	0.5 mg/l
	See Annex No.13	

*Note: <sup>1</sup>- Usage of aspartame, acesulfame potassium, neohesperidine dihydrochalcone, neotame and thaumatococcus only as taste boosters; if these accessory food substances are used in combination for chewing gum production, their maximal contents shall be proportionally decreased, that is their total amount (in percent from maximal contents of separate matters) shall make up 100%.*

**The authorised level in the EU for glutamic acid and its salts and in guanylic acid, guanylates, inosinic acids, inosinates and ribonucleotides is Quantum Satis (QS) in the EU following Directive 95/2/EC (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1995L0002:20101112:EN:PDF>).**

LIST OF CHEMICALS FLAVOR PERMITTED FOR USING IN PRODUCTION OF FLAVORINGS

We understand that the list is based on the EU-register. This is good basis for approving substances. However, the EU-register lacks all the new substances that have been placed on the market since 2004 in EU because the register was never amended to include these. Most of these substances can be found in the register database on the web but marked as not belonging to the register. We are about to finalise the Regulation authorising about 2400 substances (including these new substances) which have been evaluated by EFSA and other scientific bodies (work of 15 years). Register was the starting point for these evaluations. We hope to be able to adopt the Regulation still by the end of this year.

## HYGIENIC REGULATIONS OF EXTRACTIVE AND PROCESS SOLVENTS USE

Technological supplement	Food products, technology	Maximum residual quantity
Acetone	Flavouring agents	30 mg/kg
	Colouring agents	2 mg/kg
	Edible oil	0.1 mg/kg
Amyl acetate	Flavouring agents Colouring agents	according to the TD
Benzyl alcohol	Flavouring agents Colouring agents Fatty acids	according to the TD
Butane	Flavouring agents	1 mg/kg
	Edible oil	0.1 mg/kg
1,3-Butandiol	Flavouring agents	according to the TD
n-Butanol-1	Flavouring agents, fatty acids, colouring agents	1 g/kg
n-Butanol-2	Flavouring agents	1 mg/kg
Butyl acetate	According to the TD	according to the TD
tert-Butyl alcohol	According to the TD	according to the TD
Hexane	Flavouring agents, edible oils	1 mg/kg
Heptane	Flavouring agents, edible oils	1 mg/kg
Carbon dioxide (liquid carbonic acid)	Flavouring agents Extracts	according to the TD
Dibutyl ester	Flavouring agents	2 mg/kg
Dichlorodifluoromethane	Flavouring agents, colouring agents	1 mg/kg
Methylene chloride	Decaffeination of coffee and tea	5 mg/kg
Dichlorotetrafluoroethane	Flavouring agents	1 mg/kg
Dichlorofluoromethane	Flavouring agents	1 mg/kg
Dichloroethane	Decaffeination of coffee	5 mg/kg
Diethyl ether	Flavouring agents, colouring agents	2 mg/kg
Diethylpropylketone	According to the TD	according to the TD
Diethylcitrate	Flavouring agents, colouring agents	according to the TD
Nitrogen oxide	According to the TD	according to the TD
Isobutane	Flavouring agents	1 mg/kg
Isopropyl myristate	Flavouring agents Colouring agents	according to the TD
Isopropil alcohol (propan-2-ol)	Flavouring agents Colouring agents	according to the TD
Methyl acetate	Decaffeination of coffee	20 mg/kg
	Flavouring agents	1 mg/kg
	Sugar purification	1 mg/kg
Methylpropanol-1	Flavouring agents	1 mg/kg
n-Octyl ether	Citric acid	according to the TD
Pentane	Flavouring agents, edible oils	1 mg/kg
Petroleum ether	Flavouring agents, edible oils	1 mg/kg
Propan	Flavouring agents	1 mg/kg
	Edible oil	0.1 mg/kg
Propylene glycol (propan-1,2-diol)	Fatty acids Flavouring agents Colouring agents	according to the TD
Propyl alcohol (n-propanol-1)	Fatty acids Flavouring agents Colouring agents	according to the TD

Toluol	Flavouring agents	1 mg/kg
Tributyrate glycerol	Flavouring agents Colouring agents	according to the TD
Tridodecylamine	Citric acid	according to the TD
Tripropionate glycerol	Flavouring agents Colouring agents	according to the TD
Trichlorofluoromethane	Flavouring agents	1 mg/kg
1,1,2-Trichlorethylene	Flavouring agents, edible oils	2 mg/kg
Oil isoparaffin carbons	Citric acid	according to the TD
Cyclohexane	Flavouring agents, edible oils	1 mg/kg
Ethanol	According to the TD	according to the TD
Ethyl acetate	According to the TD	according to the TD
Ethylmethylketon (Butanone)	Fatty acids, flavouring agents, colouring agents	2 mg/kg The EU requests an alignment with the EU requirement, which is 5 mg/kg. The EU level is based on a report of the Scientific Committee on Food in 1991 <a href="http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf">http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf</a>
	Decaffeination of coffee and tea	2 mg/kg The EU requests an alignment with the EU requirement, which is 20 mg/kg. The EU level is based on a report of the Scientific Committee on Food in 1991 <a href="http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf">http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf</a>

ENZYMATIC AGENTS, PERMITTED FOR USE  
IN THE FOOD PRODUCTS MANUFACTURE

Some enzymes which are currently approved in the Russian Federation are missing, for example:

- Phospholipase from pancreatic gland of pig (*Sus scrofa*)
- Glucose oxidase from *A. oryzae*
- Phospholipase from *A. niger*
- Acetolactate decarboxylase from *B. subtilis*
- Maltogenic amylase from *B. subtilis*
- Pectin esterase from *A. oryzae*
- Xylanase from *A. oryzae*
- Xylanase from *Bacillus subtilis*
- Glucose isomerase from *Streptomyces murinus*
- Beta-glucanase from *A. aculeatus*
- Beta-glucanase from *Humicola insolens*
- Beta-glucanase from *B. amyloliquefaciens*
- Beta-glucanase from *Trichoderma viride*

*to the technical regulations***SUPPLEMENTS (MATERIALS AND SOLID SUPPORTS) FOR IMMOBILIZATION OF FERMENTS, PERMITTED FOR USE IN FOOD INDUSTRY**

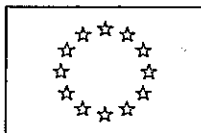
Materials and solid supports
Sodium alginate
Glutardialdehyde
Diatomite (desmid earth)
Diethylaminoethyl cellulose
Gelatine
Ion exchange resins, permitted for using in food industry
Carrageenan
Ceramics
Polyethyleneimine
Glass

**At EU level we do not have list of substances to be used for immobilization of enzymes.**

**SAFETY REQUIREMENTS AND CRITERIA OF PURITY OF FOOD ADDITIVES**

**For information, in the EU, purity criteria are currently mentioned in Directives 2008/128/EC as amended, 2008/84/EC as amended and 2008/60/EC as amended. They are going to be merged into one EU Regulation by March 2012. The Draft proposal for this EU Regulation has been voted recently (4.07.2011). In this draft some corrections of errors and omissions of the current legislation are proposed. Some of them relate to a change of the names, i.e. E 160 a, E 160b, E 466, E 469, E 960 steviol glycosides have been also included.**





EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate G – Veterinary and International Affairs  
Director

Brussels,  
SANCO G7/LC/mh D(2011) 1177539

Dear Mr Sadvakasov, dear Mr Glazyev,

**Subject: Additional EU comments on draft Technical Regulation on food additives and flavourings**

Following our letter of 20 September 2011, we would like to submit updated EU comments on the draft Customs Union Technical Regulation on food additives, flavourings and processing aids.

You will find attached a consolidated version of EU comments, where new comments compared to our submission of 20 September 2011 appear in blue. The notice of publication<sup>1</sup> of this text mentioned the alignment to EU regulations. We therefore consider the attached comments of particular relevance and would hope that they are taken into account in the elaboration of the final standard, despite the fact that the period of 60 days open for comment on the CU draft technical regulation has elapsed.

Yours sincerely,

Bernard Van Goethem

Enclosure: List of destinees;  
Consolidated EU comments on the draft CU TR on food additives, flavourings and processing aids.

---

<sup>1</sup> NOTICE on Development of the Draft Technical Regulations of the Customs Union on Requirements for Safety of Food Additives, Aromatizers and Technological Auxiliaries.

List of destinees:

Mr S. Glazyev  
Executive Secretary  
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Russian Federation

N.O. Sadvakasov  
Deputy Chairman of the Committee for  
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Department for technical regulation,  
veterinary, sanitary and phytosanitary matters  
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Russian Federation

## EU comments on the Customs Union draft Technical Regulation on food additives, flavourings and processing aids

Legal reference	Content	Comment
<p><b>Article 1.</b> Scope and Objectives of the Technical Regulations</p> <p>Point 9.9)</p>	<p>information on the use of allergenic matters in food additives and flavourings: peanuts and derived products; aspartame and aspartame-acesulfame salt; mustard and derived products; sulphur dioxide and sulphites (with the mass fraction of more than 10 mg/kg(l) in terms of sulphur dioxide); cereals containing gluten and derived products; sesame and derived products; shellfish and derived products; milk and derived products (including lactose); nuts and derived products; crustaceans and derived products; fish and derived products; celery and derived products; soybeans and derived products; eggs and derived products.</p>	<p>Since aspartame and aspartame-acesulfame salt are not allergens, we would suggest to delete them.</p>
<p><b>Article 2. Definitions</b></p> <p>according to the technical documents (according to the TD)</p>	<p>regulations established by the producer in the technical documents (technical specifications, regulations, technology guidelines, formulae, etc.) for using processing aids when their residual quantities are significantly lower than the established level or when processing aids are removed in the course of technological process and may not be evaluated by modern surveying techniques;</p>	<p>The definition of "according to the technical documents (according to the TD)" does not seem appropriate since it refers only to cases where "residual quantities are significantly lower than the established level or when processing aids are removed in the course of technological process and may not be evaluated by modern surveying techniques" while the mention "according to TD" is indicated where there are no level established. We therefore request a modification of this definition to cover cases where no maximum level is established in the Technical Regulation, and where additives and processing aids shall be used in accordance with good manufacturing practice, at a level not higher than is necessary to achieve the intended purpose and provided that they do not mislead the consumer. This would thus correspond to the EU notion of "quantum satis". This approach would be consistent with the notion of "good manufacturing practice" used in the Codex Alimentarius General Standard for Food Additives (CODEX STAN 192-1995, point 3.3).</p>
<p>food flavourings (flavourings)</p>	<p>flavour substances or flavour products or thermal process flavourings or smoke flavourings or sources of flavourings or their mixtures (flavour active components) not used directly for food and intended to give food products taste and aroma (apart from sweet, sour, salty tastes), with or without food additives and components;</p>	<p>We would suggest adopting definitions of "flavouring" and "traditional methods of preparation of food products" in line with Regulation (EC) No 1334/2008 and international guidelines such as the Guidelines of the Codex Alimentarius Commission for the use of flavourings (CAC/GL 66-2008).</p> <p>Regulation (EC) No 1334/2008 defines flavourings as follows: "Flavourings are products not intended to be consumed as such which are added to food in order to impart or modify</p>

<p>traditional methods of preparation of food products</p>	<p>boiling, including steam and pressure boiling (under 120oC), baking, roasting, braising, frying, including oil frying (under 240oC under atmospheric pressure), drying, evaporation, heating, cooling, freezing, steeping, macerating, infusing, percolation (straining), filtration, extrusion (squeezing), mixing, emulsification, chopping (cutting, kibbling, grinding, powdering), capsulation, peeling, distillation (fractionation), extraction (including solvent extraction), fermentation and microbiological processes;</p>	<p>odour and/or taste and made up of the following categories: flavouring substances, flavouring preparations, thermal process flavourings, smoke flavourings, flavour precursors or other flavourings or mixtures thereof. The definition of "flavouring should cover modifying properties.  The list of traditional food preparation processes is included in Annex II to Regulation (EC) No 1334/2008 (which can be consulted at: <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0034:0050:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0034:0050:EN:PDF</a>). The definition of traditional methods of food preparation should include grilling, pressing, coating and refrigeration.</p>
<p>natural flavour substance</p>	<p>a flavour substance derived from raw plant or animal materials with the use of physical, enzymatic or microbiological process. Including substances processed by traditional methods of preparation of food products;</p>	<p>We would suggest that the definition of "natural flavouring substance" and "natural sources of flavours" also includes microbiological source/origin (as is done under 'flavour products') and these substances should correspond to substances which are naturally present and have been identified in nature.</p>
<p>natural sources of flavours</p>	<p>plants (plant parts), animal materials used as flavour raw materials in the production of flavourings (flavour components, flavour products);</p>	
<p>thermal process flavouring</p>	<p>a mixture of substances obtained by heating under specific conditions nutritional and non-nutritional ingredients, one of which is an amino compound and the other is reductive sugar; heat treatment conditions: temperature no more than 1800C, heating time of 15 minutes at the temperature of 1800C with the respectively more time in case of lower temperatures – doubling of the heating time for each temperature fall of 100C, but no more than 12 hours; in the course of the processing the pH-value should not exceed 8.0;</p>	<p>- We would suggest the thermal process flavourings obtained from food sources should not need further evaluation when processed under the conditions required for production of thermal process flavourings. - Clarification is also requested with regard to use/authorization of thermal process flavourings from non-food source. This also applies for the definitions on precursors and source materials. Flavour ingredients made from food sources do not need further evaluation.</p>
<p>All</p>		<p>-We note that no definition of "flavouring preparation" is included, although the term is later used in article 6. We would suggest adopting a definition in line with that defined in article 16 of Regulation (EC) No 1334/2008, which can be consulted at the following webpage: <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0034:0050:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:354:0034:0050:EN:PDF</a>.  A definition of the category "other flavourings" is missing.  A definition of "flavouring preparations" is missing.</p>

**Article 3. Rules for Market Trade**

<p>Point 3</p>	<p>the following substances shall be permitted for circulation in the unified customs area of the Customs Union as flavour raw materials for the production of flavourings: 1) flavour components in accordance with appendix 19 hereof, 2) natural sources of flavours and/or flavour products made of them in accordance with the legislation of the member states of the Customs Union.</p>	<p>Flavouring substances (referred to here as 'components') under Appendix 19 are allowed and so are natural sources of flavouring substances and/or flavouring preparations made of such substances under the legislation of the customs union. It is not clear what needs to be listed in Annex 19. Do natural sources of flavour products and flavour products made from them need to be included in Annex 19?</p>
<p><b>Article 6. Requirements to Marking of Food Additives, Flavourings, Processing Aids and Food Products Containing Food Additives, Flavourings and Processing Aids</b> Art 6.4.3</p>	<p>the term "natural flavouring" in combination with the name of the food product, its category or the source of plant or food origin may be used only if the flavouring component is manufactured solely from the said source (e.g. apple natural flavouring (Apple), fruit natural flavouring (Fruit), mint natural flavouring (mint)).</p>	<p>We suggest harmonisation with the EU definition of "natural flavouring": Article 16.4 of Regulation (EC) No 1334/2008 states: The term 'natural' may only be used in combination with a reference to a food, food category or a vegetable or animal flavouring source if the flavouring component has been obtained exclusively or by at least 95 % by w/w from the source material referred to.</p>
<p>All</p>		<p>We suggest adding a category "with other natural flavourings" (WONF).</p>
<p><b>Articles 9 (Conformity Assessment) and 10 (Marking with the Uniform Mark of Products Circulation in the Market of the Member States of the Customs Union)</b> All</p>		<p>-It is not necessary to register flavour products and to list the individual components as all the used flavourings ingredients have to be listed in the annexes. Therefore, this requirement should be withdrawn. -Since the flavourings substances used must comply with appendix 19 and have undergone a safety evaluation, we do not see the need for additional registration requirements. Additionally the registration requirements are not clear. A confirmation that the components are part of the annexes of permitted substances should be sufficient.</p>
<p><b>Article 12. Final Provisions</b> All</p>		<p>There is a need to clarify the transition periods for food additives, flavourings and processing aids not in compliance with the technical regulations.</p>

### SAFETY REQUIREMENTS FOR FLAVOURINGS

1. Content of toxic elements in a flavouring shall not exceed the following values:

plumbum- 5,0 mg/kg; cadmium- 1,0 mg/kg;

arsenic- 3,0 mg/kg; mercuric- 1,0 mg/kg; Should apply to inorganic arsenic (toxic) only.

2. Fumatory flavourings shall meet the following requirements:

1) content of benz(a)pyrene shall not exceed 2 mcg/kg (!); The EU requests an harmonisation with the EU requirement, which is 10 mcg/kg The EU level is based on the recommendation of Scientific Committee on Food' (See Reports of the Scientific Committee for Food, 34th series, pp. 1 to 7: [http://ec.europa.eu/food/fs/sc/scf/reports/scf\\_reports\\_34.pdf](http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_34.pdf)).

2) content of benz(a)anthracene shall not exceed 20 mcg/kg (!);

3) content of smoking flavouring agents in benz(a)pyrene in food products shall not exceed 0,03 mcg/kg (!); In the EU, it was considered not necessary to set both a maximum level for the smoke flavouring and for the final product, since the maximum level for the smoke flavouring also covers smoke flavouring. The EU requests that a similar approach is followed in the Customs Union.

3. According to microbiological figures flavouring agents shall meet the following requirements:

Types of flavourings	Moulds, CFU/g not more than	Weight of product, in which are not allowed, g		Moulds, CFU/g not more than	Yeast, CFU/g, no more than	Notes
		Coliform bacteria (coliforms)	Pathogenic, including salmonella			
Liquid and pasty water-based flavouring agents <sup>1</sup>	$5 \times 10^2$	1.0	25	100		moulds and yeast, in total
Dry flavouring agents based on sugars, gums, salts and other products	$5 \times 10^3$	0.1	25	100	100	
Dry flavouring agents based on starch and spices	$5 \times 10^5$	0.01	25	500	100	for spices - sulphite-reducing clostridia are not allowed in 0,01 g

Note: <sup>1</sup> - except for water solutions with the content of ethyl alcohol or propylene glycol not more than 15%.

In the EU it was not considered necessary to set both heavy metals limits for flavourings and for the final products, since any contribution from flavourings is covered when setting the limits for the final products. The EU requests that a similar approach is followed in the Custom Union. The same applies for microbiological criteria.

THE LIST OF FOOD ADDITIVES, PERMITTED FOR USING  
IN THE FOOD PRODUCTS MANUFACTURE

In this text authorisations are listed according to the additive and not the food categories as in Annex II of Regulation (EC) No 1333/2008 or in *Codex Alimentarius* standards, which makes an assessment difficult to be carried out within the deadlines. The EU requests tables of correspondence with *Codex Alimentarius* General Standards for Food Additives (CODEX STAN 192-1995).

**HYGIENIC REGULATIONS OF COATING AGENTS USE**

**It is not clear if this list of permitted enzyme preparations really applies to finished foodstuff only or also to flavourings.**



HYGIENIC REGULATIONS OF TASTE AND  
FLAVOUR BOOSTERS USE

Food additive (E index)	Food products	Maximum level in products
Aspartame (E951) <sup>1</sup>	Chewing gum with sugar	2,5 g/kg
	See Annex No.13	
Acesulfame potassium (E950) <sup>1</sup>	Chewing gum with sugar	800 mg/kg
	See Annex No.13	
Zinc acetate (E650)	Chewing gum	1 g/kg
Glycine and its sodium salt (E640)	According to the TD Please see comments on the definition of "according to TD"	according to the TD
Glutamic acid (E620) and its salts: ammonium glutamate (E624), potassium glutamate (E622), calcium glutamate (E623), magnesium glutamate (E625), sodium glutamate (E621)- separately or in combination, in terms of glutamic acid	Food products	10 g/kg
	Seasoning and spices	according to the TD Please see comments on the definition of "according to TD"
Guanylic acid (E626), potassium guanylate (E628), calcium guanylate (E629), sodium guanylate (E627), inosinic acid (E630) potassium inosinate (E632), calcium inosinate (E633), sodium inosinate (E631), calcium 5'-ribonucleotides (E634), disodium 5'-ribonucleotides (E635)- separately or in combination for guanylates and inosinates - in terms of corresponding acid	Food products	500 mg/kg
	Seasoning and spices	according to the TD Please see comments on the definition of "according to TD"
Carbamide (E927b, urea)	Chewing gum without sugar	30 g/kg
	See Annex No.5	
Maltol (E636), ethyl maltol (E637)	Flavouring agents	according to the TD
Neohesperidine dihydrochalcone (E959) <sup>1</sup>	Chewing gum with sugar	150 mg/kg
	Spreads and margarines	5 mg/kg
	Meat products	5 mg/kg
	Fruit jelly (marmalade)	5 mg/kg
	Vegetable albumens	5 mg/kg
See Annex No.13		
Neotame (E961)	Flavoured soft drinks; water-based, based on fruit juices, milk and milk products without sugar or with low-calories content	2 mkg/l
	"Snacks": flavoured and ready-to-use, packed, dry, spicy, starch-containing products and nuts with coating;	2 mkg/l
	Confectionery products with starch with low- calories content or without sugar	3 mkg/l
	Micro-lollipops for breath refreshing without sugar;	3 mkg/l
	Flavoured pastils (for throats) without sugar;	3 mkg/l

	Chewing gum with sugar;	3 mkg/l
	Jams, jellies, marmalade with low-calories content	2 mkg/l
	Sauces	2 mkg/l
	Dietary supplements (liquid and powdered); Dietary supplements: vitamins and minerals in the form of syrups and chewing pills	2 mkg/l
Thaumatococcus (E957) <sup>1</sup>	Chewing gum with sugar	10 mg/kg
	Desserts	5 mg/kg
	Soft flavoured drinks	0.5 mg/l
	See Annex No.13	

*Note: <sup>1</sup> - Usage of aspartame, acesulfame potassium, neohesperidine dihydrochalcone, neotame and thaumatococcus only as taste boosters; if these accessory food substances are used in combination for chewing gum production, their maximal contents shall be proportionally decreased, that is their total amount (in percent from maximal contents of separate matters) shall make up 100%.*

The authorised level in the EU for glutamic acid and its salts and in guanylic acid, guanylates, inosinic acids, inosinates and ribonucleotides is Quantum Satis (QS) in the EU following Directive 95/2/EC (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1995L0002:20101112:EN:PDF>).

LIST OF CHEMICALS FLAVOR PERMITTED FOR USING IN PRODUCTION OF FLAVORINGS

We understand that the list is based on the EU-register. This is good basis for approving substances. However, the EU-register lacks all the new substances that have been placed on the market since 2004 in EU because the register was never amended to include these. Most of these substances can be found in the register database on the web but marked as not belonging to the register. We are about to finalise the Regulation authorising about 2400 substances (including these new substances) which have been evaluated by EFSA and other scientific bodies (work of 15 years). Register was the starting point for these evaluations. We hope to be able to adopt the Regulation still by the end of this year.

Furthermore, we recommend including in the TR a procedure to update/amend the list included in Annex 19.

The EU encourages following methods of evaluation developed by JEFCA (Joint FAO/WHO Committee on Food Additives) for assessing the safety of flavourings.

## HYGIENIC REGULATIONS OF EXTRACTIVE AND PROCESS SOLVENTS USE

Technological supplement	Food products, technology	Maximum residual quantity
Acetone	Flavouring agents	30 mg/kg
	Colouring agents	2 mg/kg. The EU requests an alignment with the EU requirement, which is 50 mg/kg. The EU level is based on a report of the Scientific Committee on Food and EFSA on various evaluations of food colours
	Edible oil	0.1 mg/kg
Amyl acetate	Flavouring agents Colouring agents	according to the TD
Benzyl alcohol	Flavouring agents Colouring agents Fatty acids	according to the TD
Butane	Flavouring agents	1 mg/kg
	Edible oil	0.1 mg/kg
1,3-Butandiol	Flavouring agents	according to the TD
n-Butanol-1	Flavouring agents, fatty acids, colouring agents	1 g/kg The EU requests an alignment with the EU requirement, which is 50 mg/kg. The EU level is based on a report of EFSA (2010) on the evaluation of the food colour E 100 cucumin
n-Butanol-2	Flavouring agents	1 mg/kg
Butyl acetate	According to the TD	according to the TD
tert-Butyl alcohol	According to the TD	according to the TD
Hexane	Flavouring agents, edible oils	1 mg/kg
Heptane	Flavouring agents, edible oils	1 mg/kg
Carbon dioxide (liquid carbonic acid)	Flavouring agents Extracts	according to the TD
Dibutyl ester	Flavouring agents	2 mg/kg
Dichlorodifluoromethane	Flavouring agents, colouring agents	1 mg/kg
Methylene chloride	Decaffeination of coffee and tea	5 mg/kg
Dichlorotetrafluoroethane	Flavouring agents	1 mg/kg
Dichlorofluoromethane	Flavouring agents	1 mg/kg
Dichloroethane	Decaffeination of coffee	5 mg/kg
Diethyl ether	Flavouring agents, colouring agents	2 mg/kg
Diethylpropylketone	According to the TD	according to the TD
Diethylcitrate	Flavouring agents, colouring agents	according to the TD
Nitrogen oxide	According to the TD	according to the TD

Isobutane	Flavouring agents	1 mg/kg
Isopropyl myristate	Flavouring agents Colouring agents	according to the TD
Isopropil alcohol (propan-2-ol)	Flavouring agents Colouring agents	according to the TD
Methyl acetate	Decaffeination of coffee	20 mg/kg
	Flavouring agents	1 mg/kg
	Sugar purification	1 mg/kg
Methylpropanol-1	Flavouring agents	1 mg/kg
n-Octyl ether	Citric acid	according to the TD
Pentane	Flavouring agents, edible oils	1 mg/kg
Petroleum ether	Flavouring agents, edible oils	1 mg/kg
Propan	Flavouring agents	1 mg/kg The EU requests an alignment with the EU requirement, which is in compliance with good manufacturing practice. The Eu level is based the Scientific Committee on Food in 1991 <a href="http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf">http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf</a>
	Edible oil	0.1 mg/kg The EU requests an alignment with the EU requirement, which is in compliance with good manufacturing practice. The Eu level is based the Scientific Committee on Food in 1991 <a href="http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf">http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf</a>
Propylene glycol (propan-1,2-diol)	Fatty acids Flavouring agents Colouring agents	according to the TD
Propyl alcohol (n-propanol-1)	Fatty acids Flavouring agents Colouring agents	according to the TD
Toluol	Flavouring agents	1 mg/kg
Tributyrate glycerol	Flavouring agents Colouring agents	according to the TD
Tridodecylamine	Citric acid	according to the TD
Tripropionate glycerol	Flavouring agents Colouring agents	according to the TD
Trichlorofluoromethane	Flavouring agents	1 mg/kg
1,1,2-Trichlorethylene	Flavouring agents, edible oils	2 mg/kg
Oil isoparaffin carbons	Citric acid	according to the TD
Cyclohexane	Flavouring agents, edible oils	1 mg/kg
Ethanol	According to the TD	according to the TD
Ethyl acetate	According to the TD	according to the TD

Ethylmethylketon (Butanone)	Fatty acids, flavouring agents, colouring agents	2 mg/kg The EU requests an alignment with the EU requirement, which is 5 mg/kg. The EU level is based on a report of the Scientific Committee on Food in 1991 <a href="http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf">http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf</a>
	Decaffeination of coffee and tea	2 mg/kg The EU requests an alignment with the EU requirement, which is 20 mg/kg. The EU level is based on a report of the Scientific Committee on Food in 1991 <a href="http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf">http://ec.europa.eu/food/fs/sc/scf/reports/scf_reports_29.pdf</a>

*Annex 30  
to the technical regulations*

**ENZYMATIC AGENTS, PERMITTED FOR USE  
IN THE FOOD PRODUCTS MANUFACTURE**

- Some enzymes which are currently approved in the Russian Federation are missing, for example:
- Phospholipase from pancreatic gland of pig (*Sus scrofa*)
  - Glucose oxidase from *A. oryzae*
  - Phospholipase from *A. niger*
  - Acetolactate decarboxylase from *B. subtilis*
  - Maltogenic amylase from *B. subtilis*

- Pectin esterase from *A. oryzae*
- Xylanase from *A. oryzae*
- Xylanase from *Bacillus subtilis*
- Glucose isomerase from *Streptomyces murinus*
- Beta-glucanase from *A. aculeatus*
- Beta-glucanase from *Humicola insolens*
- Beta-glucanase from *B. amyloliquefaciens*
- Beta-glucanase from *Trichoderma viride*

*to the technical regulations***SUPPLEMENTS (MATERIALS AND SOLID SUPPORTS) FOR IMMOBILIZATION OF FERMENTS, PERMITTED FOR USE IN FOOD INDUSTRY**

Materials and solid supports
Sodium alginate
Glutardialdehyde
Diatomite (desmid earth)
Diethylaminoethyl cellulose
Gelatine
Ion exchange resins, permitted for using in food industry
Carrageenan
Ceramics
Polyethyleneimine
Glass

At EU level we do not have list of substances to be used for immobilization of enzymes.



SAFETY REQUIREMENTS AND PURITY CRITERIA FOR FOOD ADDITIVES									
Index	Additive name	Technological functions	Purity %, not less	Toxic elements, mg/kg, not more					
				arsenic	lead	mercury	cadmium	heavy metals (as Pb)	
E100	Куркумин (CURCUMIN)	colouring agent	90 % total colouring agent	3	10	1	1		40
E101	Рибофлавины (RIBOFLAVINS): (i) Рибофлавин (Riboflavin), (ii) Натриевая соль рибофлавин 5-фосфат (Riboflavin 5-phosphate sodium).	colouring agent colouring agent	98 % on the anhydrous basis 95 % total colouring agent calculated as C <sub>17</sub> H <sub>20</sub> N <sub>4</sub> NaO <sub>9</sub> P·2H <sub>2</sub> O	3	10	1	1		40
E102	Тартразин (TARTRAZINE)	colouring agent	85 % total colouring agent calculated as the sodium salt E <sub>1 cm</sub> <sup>1%</sup> 530 at ca 426 nm in aqueous solution	3	10	1	1		40
E104	Желтый хинолиновый (QUINOLINE YELLOW)	colouring agent	70 % total colouring agent calculated as the sodium salt	3	10	1	1		40
E110	Желтый «солнечный закат» FCF (SUNSET YELLOW FCF)	colouring agent	85 % total colouring agent calculated as the sodium salt E <sub>1 cm</sub> <sup>1%</sup> 555 at ca 485 nm in aqueous solution at pH 7	3	2	1	1		-
E120	Кармины (CARMINES)	colouring agent	2,0 % carminic acid in the extracts containing carminic acid; carminic acid in the chelates.	3	10	1	1		40
E122	Азорубин, Кармуазин (AZORUBINE)	colouring agent	85 % total colouring agent, calculated as the sodium salt E <sub>1 cm</sub> <sup>1%</sup> 510 at ca 516 nm in aqueous solution	3	10	1	1		40

E124	Понсо 4R, Пунцовый 4R (PONCEAU 4R)	colouring agent	80 % total colouring agent, calculated as the sodium salt $E_{1\text{ cm}}^{1\%}$ 430 at ca 505 nm in aqueous solution	3	10	1	1	40
E129	Красный очаровательный AC (ALLURA RED AC)	colouring agent	85 % total colouring agent, calculated as the sodium salt $E_{1\text{ cm}}^{1\%}$ 540 at ca 504 nm in aqueous solution at pH 7	3	10	1	1	40
E131	Синий патентованный V (PATENT BLUE V)	colouring agent	85 % total colouring agent, calculated as the sodium salt $E_{1\text{ cm}}^{1\%}$ 2 000 at ca 638 nm in aqueous solution at pH 5	3	10	1	1	40
E132	Индигокармин (INDIGOTINE)	colouring agent	85 % total colouring agent, calculated as the sodium salt; disodium 3,3'-dioxo-2,2'-bi- indolylidene-5,7'-disulfonate; not more than 18 % $E_{1\text{ cm}}^{1\%}$ 480 at ca 610 nm in aqueous solution	3	10	1	1	40
E133	Синий блестящий FCF, бриллиантовый голубой FCF (BRILLIANT BLUE FCF)	colouring agent	85 % total colouring agent, calculated as the sodium salt $E_{1\text{ cm}}^{1\%}$ 1 630 at ca 630 nm in aqueous solution	3	10	1	1	40
E140	Хлорофилл (CHLOROPHYLL)	colouring agent	140i - Content of total combined Chlorophylls and their magnesium complexes is not less than 10 % $E_{1\text{ cm}}^{1\%}$ 700 at ca 409 nm in chloroform 140ii - 95 % of the sample dried at ca 100 °C for 1 hour. $E_{1\text{ cm}}^{1\%}$ 700 at ca 405 nm in aqueous solution at pH 9 $E_{1\text{ cm}}^{1\%}$ 140 at ca 653 nm in aqueous solution at pH 9	3	10	1	1	40

E141	Медные комплексы хлорофиллов (COPPER CHLOROPHYLLS):	colouring agent						
	(i) Медный комплекс хлорофилла (Chlorophyll copper complex),	colouring agent	Content of total copper chlorophylls is not less than 10 %. $E_{1\text{ cm}}^{1\%}$ 540 at ca 422 nm in chloroform $E_{1\text{ cm}}^{1\%}$ 300 at ca 652 nm in chloroform	3	10	1	1	-
	(ii) Медного комплекса хлорофиллина натрия и калиевой соли (Chlorophyllin copper complex, sodium and potassium salts).	colouring agent	Content of total copper chlorophyllins is not less than 95 % of the sample dried at 100 °C for 1 h. $E_{1\text{ cm}}^{1\%}$ 565 at ca 405 nm in aqueous phosphate buffer at pH 7,5 $E_{1\text{ cm}}^{1\%}$ 145 at ca 630 nm in aqueous phosphate buffer at pH 7,5	3	10	1	1	-
E142	Зеленый S (GREEN S)	colouring agent	80 % total colouring agent calculated as the sodium salt $E_{1\text{ cm}}^{1\%}$ 1 720 at ca 632 nm in aqueous solution	3	10	1	1	40
E143	Зеленый прочный FCF (FAST GREEN FCF)	colouring agent	85% total colouring agent Not authorised in EU	-	2	-	-	-
E150a	Сахарный колер I простой (CARAMEL I - Plain)	colouring agent	-	1	2	1	1	25
E150b	Сахарный колер II, полученный по «щелочно-сульфитной» технологии (CARAMEL II - Caustic sulphite process)	colouring agent	-	1	2	1	1	25
E150c	Сахарный колер III, полученный по «аммиачной» технологии (CARAMEL III - Ammonia process)	colouring agent	-	1	2	1	1	25

E150d	Сахарный колер IV, полученный по «аммиачно-сульфитной» технологии (CAMEL IV - Ammonia-sulphite process)	colouring agent	-	1	2	1	1	1	25
E151	Черный блестящий PN, бриллиантовый черный PN (BRILLIANT BLACK PN)	Colouring agent	80 % total colouring agent calculated as the sodium salt $E_{1\text{ cm}}^{1\%}$ 530 at ca 570 nm in solution	3	10	1	1	1	40
E153	Уголь растительный (VEGETABLE CARBON)	colouring agent	95 % of carbon calculated on an anhydrous and ash-free basis	3	10	1	1	1	40
E155	Коричневый HT (BROWN HT)	colouring agent	70 % total colouring agent calculated as the sodium salt. $E_{1\text{ cm}}^{1\%}$ 403 at ca 460 nm in aqueous solution at pH 7	3	10	1	1	1	40
E160a	Каротины (CAROTENES)	colouring agent							
	(i) MIXED CAROTENES	1. Plant carotenes	Content of carotenes (calculated as beta-carotene) is not less than 5 %. For products obtained by extraction of vegetables oils: not less than 0,2 % in edible fats. $E_{1\text{ cm}}^{1\%}$ 2 500 at approximately 440 nm to 457 nm in cyclohexane	-	5	-	-	-	-
	2. Algal carotenes		Content of carotenes (calculated as beta-carotene) is not less than 20 % $E_{1\text{ cm}}^{1\%}$ 2 500 at approximately 440 nm to 457 nm in cyclohexane	-	5	-	-	-	-

E 160a (ii) BETA-CAROTENE Beta-carotene	1.	96 % total colouring agent (expressed as beta-carotene) $E_{1\text{ cm}}^{1\%}$ 2 500 at approximately 440 nm to 457 nm in cyclohexane	-	2	-	-	-
2. Beta-carotene from <i>Blakeslea trispora</i>		96 % total colouring agent (expressed as beta-carotene) $E_{1\text{ cm}}^{1\%}$ 2 500 at approximately 440 nm to 457 nm in cyclohexane	-	2	-	-	-
			Mycotoxins				
			Aflatoxine B1	T-2 toxin	Ochratoxin	Zearalenon	
			Not allowed	Not allowed	Not allowed	Not allowed	
			Microbiological indices:				
			Escherichia coli in 5 g	salmonella in 25 g	Mould, CFU/g, not more	Yeast, CFU/g, not more than	
			Not allowed	Not allowed	100	100	
			Toxic elements, mg/kg, not more than				
			arsenic	lead	mercury	cadmium	heavy metals (as Pb)
E 160b Аннато экстракты (ANNATO EXTRACTS)		colouring agent					

	(i) Solvent extracted bixin and norbixin				3	10	1	1	40	
				Content of bixin powders not less than 75 % total carotenoids calculated as bixin. Content of norbixin powders not less than 25 % total carotenoids calculated as norbixin Bixin: $E_{1\text{ cm}}^{1\%}$ 2 870 at ca 502 nm in chloroform Norbixin: $E_{1\text{ cm}}^{1\%}$ 2 870 at ca 482 nm in KOH solution						
	(ii) Alkali extracted annatto			0,1 % of total carotenoids expressed as norbixin Norbixin: $E_{1\text{ cm}}^{1\%}$ 2 870 at ca 482 nm in KOH solution	3	10	1	1	40	
	(iii) Oil extracted annatto			Contains not less than 0,1 % of total carotenoids expressed as bixin Bixin: $E_{1\text{ cm}}^{1\%}$ 2 870 at ca 502 nm in chloroform	3	10	1	1	40	
E160c	Маслосмолы паприки (PAPRIKA OLEORESINS)	colouring agent		Paprika extract: content not less than 7,0 % carotenoids Capsanthin/capsorubin: not less than 30 % of total carotenoids $E_{1\text{ cm}}^{1\%}$ 2 100 at ca 462 nm in acetone	3	10	1	1	40	
E160d	Ликопин (LYCOPENE)	colouring agent		Content not less than 5 % total colouring agent $E_{1\text{ cm}}^{1\%}$ 3 450 at ca 472 nm in hexane	3	10	1	1	40	
E160e	бета-апо-Каротиновый альдегид (BETA-APO-CAROTENAL)	colouring agent		96 % of total colouring agent $E_{1\text{ cm}}^{1\%}$ 2 640 at ca 460-462 nm in cyclohexane	3	10	1	1	40	

E160f	бета-апо-8-каротиновой кислоты метиловый или этиловый эфиры (BETA-AP0-8-CAROTENOIC ACID, METHYL OR ETHYL ESTER)	colouring agent	96 % of total colouring agent $E_{1\text{ cm}}^{1\%}$ 2 550 at ca 449 nm in cyclohexane	3	10	1	1	40
E161b	Лютеин (LUTEIN)	Colouring agent	Content of total colouring agent not less than 4 % calculated as lutein $E_{1\text{ cm}}^{1\%}$ 2 550 at ca 445 nm in chloroform/ethanol (10 + 90) or in hexane/ethanol/acetone (80 + 10 + 10)	3	10	1	1	40
E161g	Кантаксантин (CANTHAXANTHIN)	colouring agent	96 % of total colouring agent (expressed as canthaxanthin) $E_{1\text{ cm}}^{1\%}$ 2 200 at ca 485 nm in chloroform at 468-472 nm in cyclohexane at 464-467 nm in petroleum ether	3	10	1	1	40
E162	Красный свекловичный (BEET RED)	colouring agent	Content of red colour (expressed as betanine) is not less than 0,4 % $E_{1\text{ cm}}^{1\%}$ 1 120 at ca 535 nm in aqueous solution at pH 5	3	10	1	1	40
E163	Антоцианы (ANTHOCYANINS)	colouring agent	$E_{1\text{ cm}}^{1\%}$ 300 for the pure pigment at 515-535 nm at pH 3,0	3	10	1	1	40
E170	Карбонат кальция (CALCIUM CARBONATE)	colouring agent (surface), free flowing agent, stabilizer, carrying agent	98 % on the anhydrous basis	3	10	-	1	-
E171	Диоксид титана (TITANIUM DIOXIDE)	colouring agent	99 % on an alumina and silica-free basis	3	10	1	1	-
E172	Оксиды и гидроксиды железа (IRON OXIDES AND HYDROXIDES)	colouring agent	Yellow not less than 60 %, red and black not less than 68 % total iron, expressed as iron	5*	20*	1*	5*	-

		Note: * By total dissolution				
E174	Серебро (SILVER)	colouring agent	99,5 % Ag	-	-	-
E175	Золото (GOLD)	colouring agent	90 % Au	-	-	-
E181	Танины пищевые (TANNINS, FOOD GRADE)	colouring agent, emulsifier, stabilizer	96% on dried basis	-	2	-
E200	Сорбиновая кислота (SORBIC ACID)	preservative	99 % on the anhydrous basis	3	5	1
E201	Сорбат натрия (SODIUM SORBATE)	Preservative	Not authorised in EU and not in Codex General Standard for Food Additives (GSFA, Codex STAN 192-1995) [hereafter: GSFA]			
E202	Сорбат калия (POTASSIUM SORBATE)	preservative	99 % on the dried basis	3	5	1
E203	Сорбат кальция (CALCIUM SORBATE)	preservative	98 % on the dried basis	3	5	1
E210	Бензойная кислота (BENZOIC ACID)	preservative	99,5 % on the anhydrous basis	3	5	1
E211	Бензоат натрия (SODIUM BENZOATE)	preservative	99 % of C <sub>7</sub> H <sub>5</sub> O <sub>2</sub> Na, after drying at 105o C for four hours	3	5	1
E212	Бензоат калия (POTASSIUM BENZOATE)	preservative	99 % C <sub>7</sub> H <sub>5</sub> KO <sub>2</sub> after drying at 105° C to constant weight	3	5	1
E213	Бензоат кальция (CALCIUM BENZOATE)	preservative	99 % after drying at 105° C	3	5	1
E214	пара-гидроксibenзойной кислоты этиловый эфир (ETHYL p-HYDROXYBENZOATE)	preservative	99,5 % after drying for two hours at 80° C	3	5	1



E215	пара-гидроксibenзойной кислоты этилового эфира натриевая соль (SODIUM ETHYL p-HYDROXYBENZOATE)	preservative	Content of ethylester of p-hydroxybenzoic acid not less than 83 % on the anhydrous basis	3	5	1	-	10
E218	пара-гидроксibenзойной кислоты метилового эфира (METHYL p-HYDROXYBENZOATE)	preservative	99 % after drying for two hours at 80° C	3	5	1	-	10
E219	пара-гидроксibenзойной кислоты метилового эфира натриевая соль (SODIUM METHYL p-HYDROXYBENZOATE)	preservative	99,5 % on the anhydrous basis	3	5	1	-	10
E220	Диоксид серы (SULPHUR DIOXIDE)	preservative, antioxidant	99%	3	5	1	-	10
E221	Сульфит натрия (SODIUM SULPHITE)	preservative, antioxidant	Anhydrous: 95 % of Na <sub>2</sub> SO <sub>3</sub> and not less than 48 % of SO <sub>2</sub> Heptahydrate: Not less than 48 % of Na <sub>2</sub> SO <sub>3</sub> and not less than 24 % of SO <sub>2</sub>	3	5	1	-	10
E222	Гидросульфит натрия (SODIUM HYDROGEN SULPHITE)	preservative, antioxidant	32 % w/w NaHSO <sub>3</sub>	3	5	1	-	10
E223	Пиросульфит натрия (SODIUM METABISULPHITE)	preservative, antioxidant	95 % Na <sub>2</sub> S <sub>2</sub> O <sub>5</sub> and not less than 64 % of SO <sub>2</sub>	3	5	1	-	10
E224	Пиросульфит калия (POTASSIUM METABISULPHITE)	preservative, antioxidant	90 % of K <sub>2</sub> S <sub>2</sub> O <sub>5</sub> and not less than 51,8 % of SO <sub>2</sub> , the remainder being composed almost entirely of potassium sulphate	3	5	1	-	10
E225	Сульфит калия (POTASSIUM SULPHITE)	preservative, antioxidant	90.0%	-	2	-	-	-
E226	Сульфит кальция (CALCIUM SULPHITE)	preservative, antioxidant	95 % of CaSO <sub>3</sub> ·2H <sub>2</sub> O and not less than 39 % of SO <sub>2</sub>	3	5	1	-	10

E227	Гидросульфит кальция (CALCIUM HYDROGEN SULPHITE)	preservative, antioxidant	6 to 8 % (w/v) of sulphur dioxide and 2,5 to 3,5 % (w/v) of calcium dioxide corresponding to 10 to 14 % (w/v) of calcium bisulphite [Ca(HSO <sub>3</sub> ) <sub>2</sub> ]	3	5	1	-	10
E228	Гидросульфит (бисульфит) калия (POTASSIUM BISULPHITE)	preservative, antioxidant	280 g KHSO <sub>3</sub> per litre (or 150 g SO <sub>2</sub> per litre)	3	5	1	-	10
E230	Дифенил (DIPHENYL)	preservative	99,80%	3	5	1	-	10
E231	орто-фенилфенол (ORTO- PHENYLPHENOL)	preservative	99% Not in EU as food additives	3	5	1	-	10
E232	орто-фенилфенола натриевая соль (SODIUM O- PHENYLPHENOL)	preservative	97 % of C <sub>12</sub> H <sub>9</sub> ONa· 4H <sub>2</sub> O Not in EU as food additives	3	5	1	-	10
E234	Низин (NISIN)	preservative	Nisin concentrate contains not less than 900 units per mg in a mixture of non-fat milk solids and a minimum sodium chloride content of 50 %	1	5	1	-	10
E235	Пимаридин, Натамидин (PIMARICIN, NATAMYCIN)	preservative	95 % on the anhydrous basis	3	5	1	-	10
				Microbiological indices:				
					QMAFAnM, CFU/g, not more than			
				100				
					Toxic elements, mg/kg, not more than			
				arsenic	lead	mercury	cadmium (Pb)	Heavy metals (in Pb)
E236	Муравьиная кислота (FORMIC ACID)	Preservative	Not authorised in EU and not in GSFA					

E242	Диметилдикарбонат (вельорин) (DIMETHYL DICARBONATE)	preservative	99,80%	3	5	1	-	10
E249	Нитрит калия (POTASSIUM NITRITE)	preservative, colour stabilizer	95 % on the anhydrous basis *	3	5	1	-	10
E250	Нитрит натрия (SODIUM NITRITE)	preservative, colour stabilizer	97 % on the anhydrous basis *	3	5	1	-	10
			Note: * When labelled 'for food use', nitrite may only be sold in a mixture with salt or a salt substitute.					
E251	Нитрат натрия (SODIUM NITRATE)	preservative, color retention agent						
	1. SOLID SODIUM NITRATE		99 % after drying	3	5	1	-	-
	2. LIQUID SODIUM NITRATE		between 33,5 % and 40,0 % of NaNO <sub>3</sub>	1*	1*	0,3*	-	-
				Note: * This specification refers to a 35 % aqueous solution				
E252	Нитрат калия (POTASSIUM NITRATE)	preservative, color retention agent	99 % on the anhydrous basis	3	5	1	-	10
E260	Уксусная кислота ледяная (ACETIC ACID GLACIAL)	preservative, color retention agent	99,80%	1	5	1	-	10
E261	Ацетаты калия (POTASSIUM ACETATES):	preservative, color retention agent	99 % on the anhydrous basis	3	5	1	-	10
	(i) Ацетат калия (Potassium acetate),							
	(ii) Диацетат калия (Potassium diacetate).							

E262	Ацетаты натрия (SODIUM ACETATES):	preservative, acidity regulator							
	(i) Ацетат натрия (Sodium acetate),		Content (for both of anhydrous and trihydrate form) not less than 98,5 % on the anhydrous basis	3	5	1	-	10	
	(ii) Диацетат натрия (Sodium diacetate).		Content 39 to 41 % of free acetic acid and 58 to 60 % of sodium acetate	3	5	1	-	10	
E263	Ацетат кальция (CALCIUM ACETATES)	preservative, stabilizer, acidity regulator, carrying agent	98 % on the anhydrous basis	3	5	1	-	10	
E264	Ацетат аммония (AMMONIUM ACETATE)	acidity regulator	Not authorised in EU and not in GSFA						
E265	Дегидрацетовая кислота (DEHYDROACETIC ACID)	Preservative	Not authorised in EU and not in GSFA						
E266	Дегидрацетат натрия (SODIUM DEHYDROACETATE)	Preservative	Not authorised in EU and not in GSFA						
E270	Молочная кислота, L-, D- и DL- (LACTIC ACID, L-, D- and DL-)	acidity regulator	not less than 76 % and not more than 84 %	3*	5*	1*	-	10*	
				Note: *This specification refers to a 80 % aqueous solution; for weaker aqueous solutions, calculate values corresponding to their lactic acid content					
E280	Пропионовая кислота (PROPIONIC ACID)	preservative	99,50%	3	5	1	-	10	
E281	Пропионат натрия (SODIUM PROPIONATE)	preservative	99 % after drying for two hours at 105° C	3	5	1	-	10	
E282	Пропионат кальция (CALCIUM PROPIONATE)	preservative	99 %, after drying for two hours at 105° C	3	5	1	-	10	

E283	Пропионат калия (POTASSIUM PROPIONATE)	preservative	99 %, after drying for two hours at 105°C	3	5	1	-	10
E290	Диоксид углерода (CARBON DIOXIDE)	acidity regulator, propellant	99 % v/v on the gaseous basis	-	-	-	-	-
E296	Яблочная кислота (MALIC ACID, DL-)	acidity regulator	99,00%	3	5	1	-	-
E297	Фуллеровая кислота (FUMARIC ACID)	acidity regulator	99,0 % on the anhydrous basis	3	5	1	-	-
E300	Аскорбиновая кислота, L- (ASCORBIC ACID, L-)	antioxidant	Ascorbic acid, after drying in a vacuum desiccator over sulphuric acid for 24 hours, contains not less than 99 % of C <sub>6</sub> H <sub>8</sub> O <sub>6</sub>	3	5	1	-	10
E301	Аскорбат натрия (SODIUM ASCORBATE)	antioxidant	Sodium ascorbate, after drying in a vacuum desiccator over sulphuric acid for 24 hours, contains not less than 99 % of C <sub>6</sub> H <sub>7</sub> O <sub>6</sub> Na	3	5	1	-	10
E302	Аскорбат кальция (CALCIUM ASCORBATE)	antioxidant	98 % on a volatile agent -free basis	3	5	1	-	10
E303	Аскорбат калия (POTASSIUM ASCORBATE)	Antioxidant Not authorised in EU and not in GSFA						
E304	Аскорбилпальмитат (ASCORBYL PALMITATE)	antioxidant						
E 304 (i)	ASCORBYL PALMITATE		98 % on the dried basis	3	5	1	-	10

E 304 (ii)	ASCORBYL STEARATE		98%		3	5	1	-	10
E305	Аскорбилстеарат (ASCORBYL STEARATE)	antioxidant	95% What is the difference with E 304 ii?		-	2	-	-	-
E306	Токферолы, концентрат смеси (MIXED TOCOPHEROLS CONCENTRATE)	antioxidant	34 % of total tocopherols		3	5	1	-	10
E307	альфа-Токферол (ALPHA-TOCOPHEROL)	antioxidant	96%		-	2	-	-	-
E308	гамма-Токферол синтетический (SYNTHETIC GAMMA-TOCOPHEROL)	antioxidant	97%		3	5	1	-	10
E309	Дельта-Токферол синтетический (SYNTHETIC DELTA-TOCOPHEROL)	antioxidant	97%		3	5	1	-	10
E310	Пропилгаллат (PROPYL GALLATE)	antioxidant	98 % on the anhydrous basis		3	5	1	-	10
E311	Октилгаллат (OCTYL GALLATE)	antioxidant	98 % after drying at 90° C for six hours		3	5	1	-	10
E312	Додецилгаллат (DODECYL GALLATE)	antioxidant	98 % after drying at 90° C for six hours		3	10	1	-	30
E314	Гваяковая смола (GUAIAIC RESIN)	antioxidant			-	2	-	-	-

E315	Изоаскорбиновая (эриторбовая) кислота (ISOASCORBIC ACID, ERYTHORBIC ACID)	antioxidant	98 % on the anhydrous basis	-	2	-	-	-
E316	Изоаскорбат натрия (SODIUM ISOASCORBATE)	antioxidant	Content not less than 98 % after drying in a vacuum desiccator over sulphuric acid for 24 hours expressed on the monohydrate basis	3	5	1	-	10
E319	трет-Бутилгидрохинон (TERTIARY BUTYLHYDROQUINONE)	antioxidant	99 % of C <sub>10</sub> H <sub>14</sub> O <sub>2</sub>	-	2	-	-	-
E320	Бутилгидроксианизол (BUTYLATED HYDROXYANISOLE)	antioxidant	Content not less than 98,5 % of C <sub>11</sub> H <sub>16</sub> O <sub>2</sub> and not less than 85 % of 3-tertiary-butyl-4-hydroxyanisole isomer	3	5	1	-	-
E321	Бутилгидрокситолуол, «Июнол» (BUTYLATED HYDROXYTOLUENE)	antioxidant	99%	3	5	1	-	10
E322	Лецитины, фосфатиды (LECITHINS)	antioxidant, emulsifier	— Lecithins: not less than 60,0 % of substances insoluble in acetone — Hydrolysed lecithins: not less than 56,0 % of substances insoluble in acetone	3	5	1	-	10
E325	Лактат натрия (SODIUM LACTATE)	Humectant, bulking agent	not less than 57 % and not more than 66 %	3*	5*	1*	-	10*

E326	Лактат калия (POTASSIUM LACTATE)	acidity regulator	not less than 57 % and not more than 66 %	3*	5*	1*	-	10*
Note: *This specification refers to a 60 % aqueous solution								
E327	Лактат кальция (CALCIUM LACTATE)	acidity regulator, flour treatment agent	98 % on the anhydrous basis	3	5	1	-	10
E328	Лактат аммония (AMMONIUM LACTATE)	acidity regulator, flour treatment agent <b>Not authorised in EU and not in GSFA</b>						
E329	Лактат магния, DL- (MAGNESIUM LACTATE, DL-)	acidity regulator, flour treatment agent						
E330	Лимонная кислота (CITRIC ACID)	acidity regulator, antioxidant	Citric acid may be anhydrous or it may contain 1 molecule of water. Citric acid contains not less than 99,5 % of C <sub>6</sub> H <sub>8</sub> O <sub>7</sub> , calculated on the anhydrous basis	1	1	1	-	5
E331	Цитраты натрия (SODIUM CITRATES):	acidity regulator, emulsifier, stabilizer, carrying agent						



	(i) Цитрат натрия 1-замещенный (Sodium dihydrogen citrate),	99 % on the anhydrous basis	1	1	1	1	-	5
	(ii) Цитрат натрия 2-замещенный (Disodium monohydrogen citrate),	99 % on the anhydrous basis	1	1	1	1	-	5
	(iii) Цитрат натрия 3-замещенный (Trisodium citrate).	99 % on the anhydrous basis	1	1	1	1	-	5
E332	Цитраты калия (POTASSIUM CITRATES):	acidity regulator, stabilizer, carrying agent						
	(i) Цитрат калия 2-замещенный (Potassium dihydrogen citrate),	99 % on the anhydrous basis	1	1	1	1	-	5
	(ii) Цитрат калия 3-замещенный (Tripotassium citrate).	99 % on the anhydrous basis	1	1	1	1	-	5
E333	Цитраты кальция (CALCIUM CITRATES)	acidity regulator , stabilizer						
	(i) MONOCALCIUM CITRATE	97,5 % on the anhydrous basis	1	1	1	1	-	5
	(ii) DICALCIUM CITRATE	97,5 % on the anhydrous basis	1	1	1	1	-	5
	(iii) TRICALCIUM CITRATE	97,5 % on the anhydrous basis	1	1	1	1	-	5

E334	Винная кислота, L(+)- (TARTARIC ACID, L(+)-)	acidity regulator , antioxidant		Not in EU	1 in EU new limit, 2 in GSFA.	1	-	5
E335	Тартраты натрия (SODIUM TARTRATES):  (i) Тартрат натрия 1-замещенный (Monosodium tartrate),  (ii) Тартрат натрия 2-замещенный (Disodium tartrate).	stabilizer		3	5	1	-	10
			99 % on the anhydrous basis	3	5	1	-	10
E336	Тартраты калия (POTASSIUM TARTRATES):  (i) Тартрат калия 1-замещенный (Monopotassium tartrate),  (ii) Тартрат калия 2-замещенный (Dipotassium tartrate).	stabilizer		3	5	1	-	10
			98 % on the anhydrous basis	3	5	1	-	10
E337	Тартрат калия-натрия (POTASSIUM SODIUM TARTRATE)	stabilizer	99 % on the anhydrous basis	3	5	1	-	10
E338	орто-Фосфорная кислота (ORTHOPHOSPHORIC ACID)	acidity regulator, antioxidant	Phosphoric acid is commercially available as an aqueous solution at variable concentrations. Content not less than 67,0 % and not more than 85,7 %.	3*	-	1*	1*	-

								Note: *This specification refers to a 75 % aqueous solution	
E339	Фосфаты натрия (SODIUM PHOSPHATES):	acidity regulator, emulsifier, humectant, stabilizer, emulsifying salt							
	(i) орто-Фосфат натрия 1-замещенный (Monosodium orthophosphate),	3	4	1	1	1	-		
	(ii) орто-Фосфат натрия 2-замещенный (Disodium orthophosphate),	3	4	1	1	1	-		
	(iii) орто-Фосфат натрия 3-замещенный (Trisodium orthophosphate).	3	4	1	1	1	-		

E340	Фосфаты калия (POTASSIUM PHOSPHATES):	acidity regulator , emulsifier, humectant, stabilizer , emulsifying salt						
	(i) орто-Фосфат калия 1-замещенный (Monopotassium orthophosphate),	98,0 % after drying at 105 ° C for four hours	3	4	1	1	1	-
	(ii) орто-Фосфат калия 2-замещенный (Dipotassium orthophosphate),	98,0 % after drying at 105° C for four hours	3	4	1	1	1	-
	(iii) орто-Фосфат калия 3-замещенный (Tripotassium orthophosphate),	97 % calculated on the ignited basis	3	4	1	1	1	-
E341	Фосфаты кальция (CALCIUM PHOSPHATES):	acidity regulator , flour treatment agent , stabilizer , leavening agent, free flowing agent, humectant, emulsifying salt, carrying agent						

	(i) орто-Фосфат кальция 1-замещенный (Monocalcium orthophosphate),	95 % on the dried basis	3	4	1	1	-
	(ii) орто-Фосфат кальция 2-замещенный (Dicalcium orthophosphate),	Dicalcium phosphate, after drying at 200o C for three hours, contains not less than 98 % and not more than the equivalent of 102 % of CaHPO4	3	4	1	1	-
	(iii) орто-Фосфат кальция 3-замещенный (Tricalcium orthophosphate).	90 % calculated on the ignited basis	3	4	1	1	-
E342	Фосфаты аммония (AMMONIUM PHOSPHATES):	acidity regulator, flour treatment agent					
	(i) орто-Фосфат аммония однозамещенный (Monoammonium orthophosphate),		3	4	1	1	-
	(ii) орто-Фосфат аммония двузамещенный (Diammonium orthophosphate).		3	4	1	1	-
E343	Фосфаты магния (MAGNESIUM PHOSPHATES):	acidity regulator, free flowing agent					
	( i ) орто-Фосфат магния 1-замещенный (Monomagnesium orthophosphate),	51,0 % after ignition	3	4	1	1	-

	(ii) орто-Фосфат магния 2-замещенный (Dimagnesium orthophosphate).	96 % after ignition	3	4	1	1	-
	(iii) орто-Фосфат магния 3-замещенный (Trimagnesium orthophosphate).	98% of Mg3(PO4)2 after ignition at 425o	-	4	-	-	-
E350	Малаты натрия (SODIUM MALATES): acidity regulator, humectant, emulsifier, stabilizer, emulsifying salt						
	(i) Малат натрия 1-замещенный (Sodium hydrogen malate)	98,0 % on the anhydrous basis	3	5	1	-	-
	(ii) Малат натрия (Sodium malate).	99,0 % on the anhydrous basis	3	5	1	-	-
E351	Малаты калия (POTASSIUM MALATES): acidity regulator, humectant, emulsifier, stabilizer, emulsifying salt	59,50%	3	5	1	-	-
	(i) Малат калия 1-замещенный (Potassium hydrogen malate)						
	(ii) Малат калия (Potassium malate).						



E381	Цитраты аммония-железа (FERRIC AMMONIUM CITRATE)	acidity regulator	Not less than 16.5% and not more than 22.5% of iron (Fe) for the brown salt, and not less than 14.5% and not more than 16.0% of iron (Fe) for the green salt.	-	2	-	-	-
E384	Изопропилцитратная смесь (ISOPROPYL CITRATES)	antioxidant, preservative		-	2	-	-	-
E385	Этилендиаминтетраацетат кальция-натрия (CALCIUM DISODIUM EDTA)	antioxidant, preservative 97% purity is missing		3	5	1	-	10
E386	Этилендиаминтетраацетат динатрий (DISODIUM ETHYLENE-DIAMINE-TETRA- ACETATE)	antioxidant, preservative	99,00%	-	2	-	-	-
E387	Оксистеарин (OXYSTEARIN)	antioxidant,						
E400	Альгиновая кислота (ALGINIC ACID)	Thickening agent, stabilizer, carrying agent	Alginic acid yields, on the anhydrous basis, not less than 20 % and not more than 23 % of carbon dioxide (CO2), equivalent to not less than 91 % and not more than 104,5 % of alginic acid (C6H8O6)n (calculated on equivalent weight basis of 200)	3	5	1	1	20
Microbiological indices:								



					QMAFAnM, CFU/g, not more than	Escherichi a coli, in 5 g	salmonella, in 10 g	Yeast, CFU/g, not more than	
					5000	Not allowed	Not allowed	500	
					Toxic elements, mg/kg, not more than				
					arsenic	lead	mercury	cadmium	Heavy metals (in Pb)
E401	Альгинат натрия (SODIUM ALGINATE)	thickening agent, stabilizer, carrying agent	Yields, on the anhydrous basis, not less than 18 % and not more than 21 % of carbon dioxide corresponding to not less than 90,8 % and not more than 106,0 % of sodium alginate (calculated on equivalent weight basis of 222)		3	5	1	1	20
					Microbiological indices:				
					QMAFAnM, CFU/g, not more than	Escherichi a coli, in 5 g	salmonella, in 10 g	Yeast, CFU/g, not more than	

					5000	Not allowed	Not allowed	500	
					Toxic elements, mg/kg, not more				
					arsenic	lead	mercury	cadmium	Heavy metals (in Pb)
E402	Альгинат калия (POTASSIUM ALGINATE)	thickening agent, stabilizer		Yields, on the anhydrous basis, not less than 16,5 % and not more than 19,5 % of carbon dioxide corresponding to not less than 89,2 % and not more than 105,5 % of potassium alginate (calculated on an equivalent weight basis of 238)	3	5	1	1	20
					Microbiological indices:				
					QMAFAnM, CFU/g, not more than	Escherichia coli, in 5 g	Salmonella, in 10 g	Yeast, CFU/g, not more than	
					5000	Not allowed	Not allowed	500	

E403	Альгинат аммония (AMMONIUM ALGINATE)	thickening agent, stabilizer, carrying agent	Yields, on the anhydrous basis, not less than 18 % and not more than 21 % of carbon dioxide corresponding to not less than 88,7 % and not more than 103,6 % ammonium alginate (calculated on an equivalent weight basis of 217)	3	5	1	1	20
Toxic elements, mg/kg, not more								
				arsenic	lead	mercury	cadmium	Heavy metals (in Pb)
E404	Альгинат кальция (CALCIUM ALGINATE)	thickening agent, stabilizer, antifoaming agent, carrying agent	Yields, on the anhydrous basis, not less than 18 % and not more than 21 % carbon dioxide corresponding to not less than 89,6 % and not more than 104,5 % of calcium alginate (calculated on an equivalent weight basis of 219)	3	5	1	1	20
Microbiological indices:								
				QMAFAnM, CFU/g, not more than	Escherichia coli, in 5 g, in 10 g	Salmonella	Yeast, CFU/g, not more than	

				5000	Not allowed	Not allowed	500		
				Toxic elements, mg/kg, not more					
				arsenic	lead	mercury	cadmium	Heavy metals (in Pb)	
E405	Пропиленгликольальгинат (PROPYLENE GLYCOL ALGINATE)	thickening agent, emulsifier, carrying agent	Yields, on the anhydrous basis, not less than 16 % and not more than 20 % of CO2 of carbon dioxide	3	5	1	1	20	
				Microbiological indices:					
				QMAFAnM; CFU/g, not more than	Escherichia coli, in 5 g	salmonella, in 10 g	Yeast, CFU/g, not more than		
				5000	Not allowed	Not allowed	500		
				Toxic elements, mg/kg, not more					
				arsenic	lead	mercury	cadmium	Heavy metals (in Pb)	

E406	Агар (AGAR)	thickening agent, gelling agent, stabilizer, carrying agent	The threshold gel concentration should not be higher than 0,25 %	3	5	1	1	20
E407	Каррагинан и его натриевая, калиевая, аммонийная соли, включая фуцеллеран (CARRAGEENAN AND ITS Na, K, NH <sub>4</sub> SALTS (INCLUDES FURCELLARAN)	thickening agent, gelling agent, stabilizer, carrying agent		3	5	1	1	-
				Microbiological indices:				
				QMAFAnM, CFU/g, not more than 5000	Escherichia coli, in 5 g	salmonella, in 10 g	Yeast, CFU/g, not more than 500	
				Toxic elements, mg/kg, not more				
				arsenic	lead	mercury	cadmium	Heavy metals (in Pb)
E407a	Каррагинан из водорослей EUCHEMA (CARRAGEENAN PES- PROCESSED EUCHEMA SEAWEED)	thickening agent, gelling agent, stabilizer, carrying agent		3	5	1	1	-
				Microbiological indices:				

				QMAFAnM, CFU/g, not more than	Escherichia coli, in 5 g	Escherichia salmonella, in 10 g	Yeast, CFU/g, not more than	
							Not allowed	500
				5000	Not allowed	Not allowed		
				Toxic elements, mg/kg, not more				
				arsenic	lead	mercury	cadmium	heavy metals (in Pb)
E409	Арабиногалактан (ARABINOGALACTAN)	thickening agent, gelling agent						
E410	Камедь рожкового дерева (CAROB BEAN GUM)	thickening agent, stabilizer, carrying agent	Galactomannan content not less than 75 %	3	5	1	1	20
E412	Гуаровая камедь (GUAR GUM)	thickening agent, stabilizer, carrying agent	Galactomannan content not less than 75 %	3	5	1	1	20
E413	Трагакант камедь (TRAGACANTH GUM)	thickening agent, stabilizer emulsifier, carrying agent		3	5	1	1	20
				Microbiological indices:				
				Escherichia coli, in 5 g	salmonella, in 10 g			
				Not allowed	Not allowed			
				Toxic elements, mg/kg, not more				

E414	Гуммиарабик (GUM ARABIC (ACACIA GUM))	thickening agent, stabilizer, carrying agent		arsenic 3	lead 5	mercury 1	cadmium 1	Heavy metals (in Pb) 20
E415	Ксантановая камедь (XANTAN GUM)	thickening agent, stabilizer, carrying agent	Yields, on dried basis, not less than 4,2 % and not more than 5 % of CO2 corresponding to between 91 % and 108 % of xanthan gum	-	2	-	-	-
				Microbiological indices: <i>Xanthomonas campestris</i> – cells are absent in 1 g				
				Toxic elements, mg/kg, not more				
E416	Карайи камедь (KARAYA GUM)	thickening agent, stabilizer		arsenic 3	lead 5	Mercury 1	cadmium 1	Heavy metals (in Pb) 20
				Microbiological indices:				
				Escherichia coli, in 5 g	salmonella, in 10 g			
				Not allowed	Not allowed			
				Toxic elements, mg/kg, not more				
				arsenic	lead	mercury	cadmium	Heavy metals (in Pb)

E417	Тары камедь (TARA GUM)	thickening agent, stabilizer	3	5	1	1	20
E418	Геллановая камедь (GELLAN GUM)	thickening agent, stabilizer, gelling agent	3	2	1	1	20
			Microbiological indices:				
			QMAFAnM, CFU/g, not more than	Escherichia coli, in 5 g	salmonella, in 10 g more	Moulds and yeast	CFU/g not more
			10000	Not allowed	Not allowed	400	
			Toxic elements, mg/kg, not more				
			arsenic	lead	mercury	cadmium	heavy metals (in Pb)
E420	Сорбит и сорбитовый сироп (SORBITOL AND SORBITOL SYRUP)	sweetening agent, humectant, emulsifier, carrying agent					



	(i) SORBITOL			Not less than 97.0% of C6H14O6 of total glycitols and not less than 91.0% compounds with the structural formula $\text{CH}_2\text{OH}-(\text{CHOH})_n-\text{CH}_2\text{OH}$ , where n of D-sorbitol on the anhydrous basis. The term glycitols refers to is an integer less than or equal to 4.	-	1	-	-	-
	(ii) SORBITOL SYRUP			Not less than 99.0% hydrogenated saccharides and not less than 50.0% of D-sorbitol on the anhydrous basis	-	1	-	-	-
E421	Маннит (MANNITOL)		sweetening agent, free flowing agent, carrying agent	Not less than 96.0% and not more than 102.0% on the dried basis	-	1	-	-	-
E422	Глицерин (GLYCEROL)		humectant, thickening agent, carrying agent	98 % of glycerol on the anhydrous basis	3	2	1	-	5
E425	Конжак (Конжаковая мука)(KONJAC (KONJAC FLOUR)):		thickening agent						
	(i) Конжаковая камедь (KONJAC GUM),			75 % carbohydrate	3	2	-	-	-
	(ii) Конжаковый глюкоманнан (KONJAC GLUCOMANNANE).			Total dietary fibre: not less than 95 % on a dry weight basis	-	1	-	-	-
									Microbiological indices:

				Escherichia coli, in 5 g	salmonella, in 12,5 g	
				Not allowed	Not allowed	
				Toxic elements, mg/kg, not more		
				arsenic	lead	mercury
						cadmium (in Pb)
E426	Гемиллюлоза сои (SOYBEAN HEMICELLULOSE)	thickening agent, stabilizer	74 % carbohydrate	2	5	1
				Microbiological indices:		
				QMAFAnM, CFU/g, not more than	Escherichia coli, in 10 g	Moulds and yeast CFU/g not more
				3000	Not allowed	100
				Toxic elements, mg/kg, not more		
				arsenic	lead	mercury
						cadmium (in Pb)

E430	Полиоксиэтилен (8) стеарат (POLYOXYETHYLENE (8) STEARATE)	emulsifier	Not less than 53.0 and not more than 57.0% of oxyethylene groups equivalent to not less than 96.0 and not more than 103.0% of polyoxyethylene (8) stearate calculated on the anhydrous basis.	-	2	-	-	-
E431	Полиоксиэтилен (40) стеарат (POLYOXYETHYLENE (40) STEARATE)	emulsifier, carrying agent	97,5 % on the anhydrous basis	3	5	1	1	-
E432	Полиоксиэтилен (20) сорбитан монолаурат, Твин 20 (POLYOXYETHYLENE (20) SORBITAN MONOLAURATE)	Emulsifier, carrying agent	Content not less than 70 % of oxyethylene groups, equivalent to not less than 97,3 % of polyoxyethylene (20) sorbitan monolaurate on the anhydrous basis	3	5	1	1	-
E433	Полиоксиэтилен (20) сорбитан моноолеат, Твин 80 (POLYOXYETHYLENE (20) SORBITAN MONOOLEATE)	emulsifier, carrying agent	Content not less than 65 % of oxyethylene groups, equivalent to not less than 96,5 % of polyoxyethylene (20) sorbitan monooleate on the anhydrous basis	3	5	1	1	-
E434	Полиоксиэтилен (20) сорбитан моно-пальмитат, Твин 40 (POLYOXYETHYLENE (20) SORBITAN MONOPALMITATE)	emulsifier, carrying agent	Content not less than 66 % of oxyethylene groups, equivalent to not less than 97 % of polyoxyethylene (20) sorbitan monopalmitate on the anhydrous basis	3	5	1	1	-

E435	Полиоксизтилен (20) сорбитан моностеарат, Твин 60 (POLYOXYETHYLENE (20) SORBITAN MONOSTEARATE)	Emulsifier, carrying agent	Content not less than 65 % of oxyethylene groups, equivalent to not less than 97 % of polyoxyethylene (20) sorbitan monostearate on the anhydrous basis	3	5	1	1	-
E436	Полиоксизтилен (20) сорбитан три-стеарат (POLYOXYETHYLENE (20) SORBITAN TRISTEARATE)	emulsifier, carrying agent	Content not less than 46 % of oxyethylene groups, equivalent to not less than 96 % of polyoxyethylene (20) sorbitan tristearate on the anhydrous basis	3	5	1	1	-
E440	Пектины (PECTINS)	thickening agent, stabilizer, gelling agent, carrying agent						
	(i) PECTIN		Content not less than 65 % of galacturonic acid on the ash-free and anhydrous basis after washing with acid and alcohol	3	5	1	1	20
	(ii) AMIDATED PECTIN		Content not less than 65 % of galacturonic acid on the ash-free and anhydrous basis after washing with acid and alcohol	3	5	1	1	20

E442	Фосфатидиловой кислоты аммонийные соли (фосфатиды аммония) (AMMONIUM SALTS OF PHOSPHATIDIC ACID)	emulsifier, carrying agent	The phosphorus content is not less than 3 % and not more than 3,4 % by weight; the ammonium content is not less than 1,2 % and not more than 1,5 % (calculated as N),	3	5	1	1	1	10
E444	Сахарозы ацетат изобутират (SUCROSE ACETATE ISOBUTIRAT)	emulsifier, carrying agent	98,8 % and not more than 101,9 % of C <sub>40</sub> H <sub>62</sub> O <sub>19</sub>	3	3	1	1	1	5
E445	Эфиры глицерина и смоляных кислот (GLYCEROL ESTERS OF WOOD RESIN)	emulsifier, carrying agent		3	2	1	1	1	10
E450	Пирофосфаты (DIPHOSPHATES):	emulsifier, stabilizer, acidity regulator, leavening agent, humectant							
	(i) Дигидропирофосфат натрия (Disodium diphosphate),		than 95 % of disodium diphosphate	3	4	1	1	1	-
	(ii) Моногидропирофосфат натрия (Trisodium diphosphate),		95 % on the anhydrous basis	3	4	1	1	1	-
	(iii) Пирофосфат натрия (Tetrasodium diphosphate);		95 % of Na <sub>4</sub> P <sub>2</sub> O <sub>7</sub> on the ignited basis	3	4	1	1	1	-

	(iv) Дигидропирофосфат калия (Dipotassium diphosphate), Not authorised in EU and not in GSFA									
	(v) Пирофосфат калия (Tetrapotassium diphosphate),	95 % on the ignited basis	3	4	1	1				-
	(vi) Пирофосфат кальция (Dicalcium diphosphate),	98%	3	4	1	1				-
	(vii) Дигидропирофосфат кальция (Calcium dihydrogen diphosphate).	90 % on the anhydrous basis	3	4	1	1				-
E451	Трифосфаты (TRIPHOSPHATES):	acidity regulator								
	(i) Трифосфат натрия (5-замещенный) (Pentasodium triphosphate),	85,0 % (anhydrous) or 65,0 % (hexahydrate)	3	4	1	1				-
	(ii) Трифосфат калия (5-замещенный) (Pentapotassium triphosphate).	85 % on the anhydrous basis	3	4	1	1				-
E452	Полифосфаты (POLYPHOSPHATES):	emulsifier, stabilizer, humectants								
	(i) Полифосфат натрия (Sodium polyphosphate),									
	1. SOLUBLE POLYPHOSPHATE	P2O5 content Not less than 60 % and not more than 71 % on the ignited basis	3	4	1	1				-

2. INSOLUBLE POLYPHOSPHATE										
	(i) Полифосфат калия (Potassium polyphosphate),	P2O5 content Not less than 68,7 % and not more than 70,0 %	3	4	1	1	1	1	-	-
	(ii) Полифосфат натрия-кальция (Sodiumcalcium polyphosphate),	P2O5 content Not less than 53,5 % and not more than 61,5 % on the ignited basis	3	4	1	1	1	1	-	-
	(iii) Полифосфат натрия-кальция (Sodiumcalcium polyphosphate),	Not less than 61 % and not more than 69 % as P2O5	3	4	1	1	1	1	-	-
	(iv) Полифосфаты кальция (Calcium polyphosphates),	P2O5 content Not less than 71 % and not more than 73 % on the ignited basis	3	4	1	1	1	1	-	-
	(v) Полифосфаты аммония (Ammonium polyphosphates).	Not less than 55.0% and not more than 75.0% on an anhydrous basis, calculated as P2O5	-	4	-	-	-	-	-	-
E459	бета-Циклодекстрин (BETA-CYCLODEXTRIN)	98,0 % of (C6H10O5)7 on an anhydrous basis	1	1	-	-	-	-	-	-
E460	Целлюлоза (CELLULOSE):	emulsifier, free flowing agent								
	(i) Целлюлоза микрокристаллическая (Microcrystalline cellulose),	97 % calculated as cellulose on the anhydrous basis	3	5	1	1	1	1	10	10
	(ii) Целлюлоза в порошке (Powdered cellulose).	92%	3	5	1	1	1	1	10	10

E461	Метилцеллюлоза (METHYL CELLULOSE)	thickening agent, emulsifier, carrying agent	Content not less than 25 % and not more than 33 % of methoxyl groups (-OCH3) and not more than 5 % of hydroxyethoxyl groups (-OCH2CH2OH)	3	5	1	1	20
E462	Этилцеллюлоза (ETHYL CELLULOSE)	filling agent, carrying agent	Content not less than 44. % and not more than 50 % of ethoxyl groups (-OC2H5) on the dried basis (equivalent to not more than 2,6 ethoxyl groups per anhydroglucose unit)	3	2	1	1	-
E463	Гидроксипропилцеллюлоза (HYDROXYPROPYL CELLULOSE)	thickening agent, emulsifier, stabilizer	Content not less than 80,5 % of hydroxypropoxyl groups (-OCH2CHOHCH3) equivalent to not more than 4,6 hydroxypropyl groups per anhydroglucose unit on the anhydrous basis	3	5	1	1	20
E464	Гидроксипропилметилцеллюлоза (HYDROXYPROPYL METHYL CELLULOSE)	thickening agent, emulsifier, stabilizer, carrying agent	Content not less than 19 % and not more than 30 % methoxyl groups (-OCH3) and not less than 3 % and not more than 12 % hydroxypropoxyl groups (-OCH2CHOHCH3), on the anhydrous basis	3	5	1	1	20



E465	Метилэтилцеллюлоза (METHYL ETHYL CELLULOSE)	thickening agent, emulsifier, stabilizer, foaming agent, carrying agent	Content on the anhydrous basis not less than 3,5 % and not more than 6,5 % of methoxyl groups (-OCH3) and not less than 14,5 % and not more than 19 % of ethoxyl groups (-OCH2CH3), and not less than 13,2 % and not more than 19,6 % of total alkoxy) groups, calculated as	3	5	1	1	20
E466	Карбоксиметилцеллюлоза (CARBOXYMETHYL CELLULOSE)	thickening agent, carrying agent						
	Карбоксиметилцеллюлоза натриевая соль (SODIUM CARBOXYMETHYL CELLULOSE)		Content on the anhydrous basis not less than 99,5 %	3	5	1	1	20
	Камень целлюлозы (CELLULOSE GUM) (covered by E 466 in EU)							
E467	Этилгидроксиэтилцеллюлоза (ETHYL HYDROXYETHYL CELLULOSE)	emulsifier, thickening agent, stabilizer	Not less than 7% and not more than 19% of ethoxyl groups (-OC2H5), and not less than 10% and not more than 38% of oxyethylene groups (-OCH2CH2-), on the dried and salt-free basis.	-	5	-	-	-

E468	Кроскармеллоза (карбоксиметилцеллюлоза натриевая соль кроссвязанная) - CROSCARAMELLOSE (CROS-S-LINKED SODIUM CARBOXYMETHYL CELLULOSE)	stabilizer, carrying agent	3	5	1	1	-	
E469	Карбоксиметилцеллюлоза ферментативно гидролизованная (ENZYMATICALLY HYDROLYSED CARBOXYMETHYL CELLULOSE)	thickening agent, stabilizer, carrying agent	-	3	-	-	-	
	Камень целлюлозы ферментативно гидролизованная (EU)	(ENZYMATICALLY HYDROLYSED CELLULOSE GUM)	(covered by E 469 in EU)					
E470	Жирные кислоты, соли кальция, натрия, магния, калия и аммония (SALTS OF FATTY ACIDS (with base Al, Ca, Na, Mg, K and NH <sub>4</sub> ))	emulsifier, stabilizer, free flowing agent, carrying agent						

E 470a	SODIUM, POTASSIUM AND CALCIUM SALTS OF FATTY ACIDS	Content on the anhydrous basis not less than 95 %	3	5	1	1	10
E 470b	MAGNESIUM SALTS OF FATTY ACIDS	Content on the anhydrous basis not less than 95 %	3	5	1	1	10
E471	Моно- и диглицериды жирных кислот (MONO- AND DIGLYCERIDES OF FATTY ACIDS)	emulsifier, stabilizer, carrying agent	3*	5*	1*	1*	10*
E472a	Эфиры глицерина и уксусной и жирных кислот (ESTERS ACETIC AND FATTY ACID OF GLYCEROL)	emulsifier, stabilizer, carrying agent	3*	5*	1*	1*	10*
E472b	Эфиры глицерина и молочной и жирных кислот (ESTERS LACTIC AND FATTY ACID OF GLYCEROL)	emulsifier, stabilizer	3*	5*	1*	1*	10*
E472c	Эфиры глицерина и лимонной и жирных кислот (CITRIC AND FATTY ACID ESTERS OF GLYCEROL)	emulsifier, stabilizer, carrying agent	3 in EU, not in GSFA-	2*	-1 in EU not in GSFA	-1 in EU not in GSFA	-

E472d	Эфиры моно- и диглицеридов жирных кислот и винной кислоты (TARTARIC ACID ESTERS OF MONO- AND DIGLYCERIDES OF FATTY ACIDS)	emulsifier, stabilizer		3*	5*	1*	1*	10*
E472e	Эфиры глицерина и диацетилвинной и жирных кислот (DIACETYLTARTARIC AND FATTY ACID ESTERS OF GLYCEROL)	emulsifier, stabilizer, carrying agent		3*	5*	1*	1*	10*
E472f	Эфиры смешанные глицерина и винной, уксусной и жирных кислот (MIXED TARTARIC, ACETIC AND FATTY ACID ESTERS OF GLYCEROL)	emulsifier, stabilizer		3*	5*	1*	1*	10*
E473	Эфиры сахарозы и жирных кислот (SUCROSE ESTERS OF FATTY ACIDS)	emulsifier, carrying agent	80%	3*	5*	1*	1*	10*
E474	Сахароглицериды (SUCROGLYCERIDES)	emulsifier	not less than 40 % and not more than 60 % of sucrose fatty acid esters	3*	5*	1*	1*	10*
E475	Эфиры полиглицерина и жирных кислот (POLYGLYCEROL ESTERS OF FATTY ACIDS)	emulsifier, carrying agent	Content of total fatty acid ester not less than 90 %	3*	5*	1*	1*	10*

E476	Эфиры полиглицерина и взаимоэтерифицированных рициноловых кислот (POLYGLYCEROL ESTERS OF INTERESTERIFIED RICINOLEIC ACID)		emulsifier				3	5	1	1	10	*Note: Purity criteria apply to the additive free of sodium, potassium and calcium salts of fatty acids, however these substances may be present up to a maximum level of 6 % (expressed as sodium oleate).
E477	Эфиры пропиленгликоля и жирных кислот (PROPYLENE GLYCOL ESTERS OF FATTY ACIDS)		emulsifier	Content of total fatty acid ester not less than 85 %			3*	5*	1*	1*	10*	
E479	Термически окисленное соевое масло с моно- и диглицеридами жирных кислот (THERMALLY OXIDIZED SOYABEAN OIL WITH MONO- AND DIGLYCERIDES OF FATTY ACIDS)		emulsifier									*Note: Purity criteria apply to the additive free of sodium, potassium and calcium salts of fatty acids, however these substances may be present up to a maximum level of 6 % (expressed as sodium oleate).
E 479 b	THERMALLY OXIDISED SOYA BEAN OIL INTERACTED WITH MONO- AND DIGLYCERIDES OF FATTY ACIDS						3	5	1	1	10	
E480	Дидецилсульфосукцинат натрия (DIOCTYL SODIUM SULPHOSUCCINATE)		emulsifier, humectant agent	98.5% on the dried basis			-	2	-	-	-	*Note: Purity criteria apply to the additive free of sodium, potassium and calcium salts of fatty acids, however these substances may be present up to a maximum level of 6 % (expressed as sodium oleate).
E481	Стеароил-2-лактат натрия (SODIUM STEAROYL -2- LACTYLATE)		emulsifier, stabilizer				3	5	1	1	10	
E482	Стеароил-2-лактат кальция (CALCIUM STEAROYL -2- LACTYLATE)		emulsifier, stabilizer				3	5	1	1	10	

E483	Стеарилтарат (STEARYL TARTRATE)	flour treatment agent	Content of total ester not less than 90 % corresponding to an ester value of not less than 163 and not more than 180	3	5	1	1	1	10
E484	Стеарилцитрат (STEARYL CITRATE)	Emulsifier		-	2	-	-	-	-
E491	Сорбитан моностеарат, СПЭН 60 (SORBITAN MONOSTEARATE)	emulsifier, carrying agent	Content not less than 95 % of a mixture of sorbitol, sorbitan, and isosorbide esters	3	5	1	1	1	10
E492	Сорбитан тристеарат (SORBITAN TRISTEARATE)	emulsifier, carrying agent	Content not less than 95 % of a mixture of sorbitol, sorbitan, and isosorbide esters	3	5	1	1	1	10
E493	Сорбитан монолаурат, СПЭН 20 (SORBITAN MONOLAURATE)	emulsifier, carrying agent	Content not less than 95 % of a mixture of sorbitol, sorbitan, and isosorbide esters	3	5	1	1	1	10
E494	Сорбитан моноолеат, СПЭН 80 (SORBITAN MONOOLEATE)	emulsifier, carrying agent	Content not less than 95 % of a mixture of sorbitol, sorbitan and isosorbide esters	3	5	1	1	1	10
E495	Сорбитан монопальмитат, СПЭН 40 (SORBITAN MONOPALMITATE)	emulsifier, carrying agent	Content not less than 95 % of a mixture of sorbitol, sorbitan and isosorbide esters	3	5	1	1	1	10
E500	Карбонаты натрия (SODIUM CARBONATES):	acidity regulator, leavening agent							
	(i) Карбонат натрия (Sodium carbonate),		99 % of Na <sub>2</sub> CO <sub>3</sub> on the anhydrous basis	3	5	1	-	-	-
	(ii) Гидрокарбонат натрия (Sodium hydrogen carbonate),		99 % on the anhydrous basis	3	5	1	-	-	-
	(iii) Смесь карбоната и гидрокарбоната натрия (Sodium sesquicarbonate).		between 35,0 % and 38,6 % of NaHCO <sub>3</sub> and between 46,4 % and 50,0 % of Na <sub>2</sub> CO <sub>3</sub>	3	5	1	-	-	-

E501	Карбонаты калия (POTASSIUM CARBONATES):	acidity regulator, stabilizer, carrying agent								
	(i) Карбонат калия (Potassium carbonate),		99,0 % on the anhydrous basis	3	5	1	-	-	-	-
	(ii) Гидрокарбонат калия (Potassium hydrogen carbonate).		Content not less than 99,0 % and not more than 101,0 % KHCO <sub>3</sub> on the anhydrous basis	3	5	1	-	-	-	-
E503	Карбонаты аммония (AMMONIUM CARBONATES):	acidity regulator, leavening agent								
	(i) Карбонат аммония (Ammonium carbonate),		not less than 30,0 % and not more than 34,0 % of NH <sub>3</sub>	3	5	1	-	-	-	-
	(ii) Гидрокарбонат аммония (Ammonium hydrogen carbonate).		99,00%	3	5	1	-	-	-	-
E504	Карбонаты магния (MAGNESIUM CARBONATES):	acidity regulator, free flowing agent, colour stabilizer, carrying agent								
	(i) Карбонат магния (Magnesium carbonate),		Not less than 24.0% and not more than 26.4% of Mg	4 in EU	2	1 in EU	-	-	-	-
	(ii) Гидрокарбонат магния (Magnesium hydrogen carbonate).		Mg content not less than 40,0 % and not more than 45,0 % calculated as MgO	3	10	1	-	-	-	-
E507	Соляная кислота (HYDROCHLORIC ACID)	acidity regulator	Hydrochloric acid is commercially available in varying concentrations. Concentrated hydrochloric acid contains not less than 35,0 % HCl	1	1	1	-	-	-	-
E508	Хлорид калия (POTASSIUM CHLORIDE)	gelling agent, carrying agent	99 % on the dried basis	3	5	1	1	1	10	-
E509	Хлорид кальция (CALCIUM CHLORIDE)	firming agent, carrying agent	93,0 % on the anhydrous basis	3	10	1	-	-	-	-

E510	Хлорид аммония (AMMONIUM CHLORIDE)	flour treatment agent	99,0% on the dried basis	-	2	-	-
E511	Хлорид магния (MAGNESIUM CHLORIDE)	firming agent, carrying agent	99,00%	3	10	1	-
E513	Серная кислота (SULPHURIC ACID)	acidity regulator	Sulphuric acid is commercially available in varying concentrations. The concentrated form contains not less than 96,0 %	3	5	1	-
E514	Сульфаты натрия (SODIUM SULPHATES)	acidity regulator, carrying agent					
	(i) SODIUM SULPHATE		99,0 % on the anhydrous basis	3	5	1	-
	(ii) SODIUM HYDROGEN SULPHATE		95,20%	3	5	1	-
E515	Сульфаты калия (POTASSIUM SULPHATES)	acidity regulator, carrying agent					
	(i) POTASSIUM SULPHATE		99,00%	3	5	1	-
	(ii) POTASSIUM HYDROGEN SULPHATE		99,00% 95,2% in EU, 85% in GSFA	3	5	1	-
E516	Сульфат кальция (CALCIUM SULPHATE)	flour treatment agent, firming agent, carrying agent	99,0 % on the anhydrous basis	3	5	1	-
E517	Сульфат аммония (AMMONIUM SULPHATE)	flour treatment agent, stabilizer, carrying agent	not less than 99,0 % and not more than 100,5 %	-	5	-	-



E518	Сульфат магния (MAGNESIUM SULPHATE)	firming agent	Not less than 99.0 % and not more than 100.5% on the ignited basis	3	2	-	-	-
E520	Сульфат алюминия (ALUMINIUM SULPHATE)	firming agent	99,5 % on the ignited basis	3	10	1	-	-
E521	Сульфат алюминия-натрия, квасцы алюмо-натриевые (ALUMINIUM SODIUM SULPHATE)	firming agent	Content on the anhydrous basis not less than 96,5 % (anhydrous) and 99,5 % (dodecahydrate)	3	5	1	-	-
E522	Сульфат алюминия-калия, квасцы алюмо-калиевые (ALUMINIUM POTASSIUM SULPHATE)	acidity regulator, stabilizer	99,50%	3	5	1	-	-
E523	Сульфат алюминия-аммония, квасцы алюмоаммиачные (ALUMINIUM AMMONIUM SULPHATE)	stabilizer, firming agent	99,50%	3	5	1	-	-
E524	Гидроксид натрия (SODIUM HYDROXIDE)	acidity regulator	Content of solid forms not less than 98,0 % of total alkali (as NaOH). Content of solutions accordingly, based on the stated or labelled percentage of NaOH	3	0,5	1	-	-
E525	Гидроксид калия (POTASSIUM HYDROXIDE)	acidity regulator	85,0 % of alkali calculated as KOH	3	10	1	-	-
E526	Гидроксид кальция (CALCIUM HYDROXIDE)	acidity regulator, firming agent	92,00%	3	10	-	-	-

E527	Гидроксид аммония (AMMONIUM HYDROXIDE)	acidity regulator	27 % of NH3	3	5	-	-	-
E528	Гидроксид магния (MAGNESIUM HYDROXIDE)	acidity regulator, colour stabilizer	95,0 % on the anhydrous basis	3	10	-	-	-
E529	Оксид кальция (CALCIUM OXIDE)	acidity regulator, flour treatment agent	95,0 % on the ignited basis	3	10	-	-	-
E530	Оксид магния (MAGNESIUM OXIDE)	free flowing agent	98,0 % on the ignited basis	3	10	-	-	-
E535	Ферроцианид натрия (SODIUM FERROCYANIDE)	free flowing agent	99,00%	-	5	-	-	-
E536	Ферроцианид калия (POTASSIUM FERROCYANIDE)	free flowing agent	99,00%	-	5	-	-	-
E538	Ферроцианид кальция (CALCIUM FERROCYANIDE)	free flowing agent	99,00%	-	5	-	-	-
E541	Алюмофосфат натрия кислый (SODIUM ALUMINIUM PHOSPHATE ACIDIC)	acidity regulator, emulsifier	95,0 % (both forms)	3	4	1	1	-
E542	Фосфат костный (фосфат кальция) (BONE PHOSPHATE (essentiale Calcium phosphate, tribasic))	emulsifier, humectant	Not less than 30% and not more than 40% of Ca, and not less than 32% of P2O5.	3	2	-	-	-
				Microbiological indices:				

					Aerobic microorganisms CFU/g, not more than	Escherichia coli, in 10 g	salmonella, in 50 g
E551	Диоксид кремния аморфный (SILICON DIOXIDE AMORPHOUS)	free flowing agent, carrying agent		Content after ignition not less than 99,0 % (fumed silica) or 94,0 % (hydrated forms)	1000	Not allowed	
E552	Силикат кальция (CALCIUM SILICATE)	free flowing agent, carrying agent		Content on the anhydrous basis: — as SiO <sub>2</sub> not less than 50 % and not more than 95 % — as CaO not less than 3 % and not more than 35 %	3	5	-
E553	Силикаты магния (MAGNESIUM SILICATES):	free flowing agent					
	(i) Силикат магния (Magnesium silicate), In EU registered as E 553 a (i)			Content not less than 15 % of MgO and not less than 67 % of SiO <sub>2</sub> on the ignited basis	3	5	-
	(ii) Трисиликат магния (Magnesium trisilicate), In EU registered as E 553 a (ii)			Content not less than 29,0 % of MgO and not less than 65,0 % of SiO <sub>2</sub> both on the ignited basis	3	5	-
	(iii) Тальк (Talc), In EU registered as 553b, in GSFA registered as 553 (iii)				10	5	-
E554	Алюмосиликат натрия (SODIUM ALUMINOSILICATE)	free flowing agent		Content on the anhydrous basis: — as SiO <sub>2</sub> not less than 66,0 % and not more than 88,0 % — as Al <sub>2</sub> O <sub>3</sub> not less than 5,0 % and not more than 15,0 %	3	5	-
E555	Алюмосиликат калия (POTASSIUM ALUMINIUM SILICATE)	free flowing agent		98%	3	10	-

E556	Алюмосиликат кальция (CALCIUM ALUMINIUM SILICATE)	free flowing agent	Content on the anhydrous basis: — as SiO2 not less than 44,0 % and not more than 50,0 % — as Al2O3 not less than 3,0 % and not more than 5,0 % — as CaO not less than 32,0 % and not more than 38,0 %	3	10	1	-	-
E558	Бентонит (BENTONITE)	free flowing agent, carrying agent	Montmorillonite content not less than 80 %	2	20	-	-	-
E559	Алюмосиликат (каолин) – ALUMINIUM SILICATE (KAOLIN)	free flowing agent, carrying agent	Content not less than 90 % (sum of silica and alumina, after ignition) Silica (SiO2) Between 45 % and 55 % Alumina (Al2O3) Between 30 % and 39 %	3	5	1	-	-
E570	Жирные кислоты (FATTY ACIDS)	stabilizer, coating agent, anti-foaming agent, carrying agent	98 % by chromatography	3	1	1	-	-
E574	Глюконовая кислота (D-) (GLUCONIC ACID (D-))	acidity regulator, antioxidant, leavening agent	50,0 % (as gluconic acid)	3	5	1	-	-
E575	Глюконо-дельта-лактон (GLUCONO DELTA-LACTONE)	acidity regulator, antioxidant, leavening agent	99,0 % on the anhydrous basis	-	2	-	-	-
E576	Глюконат натрия (SODIUM GLUCONATE)	acidity regulator, antioxidant	98,00%	-	2	-	-	-
E577	Глюконат калия (POTASSIUM GLUCONATE)	acidity regulator, antioxidant, carrying agent	not less than 97,0 % and not more than 103,0 % on dried basis	-	2	-	-	-
E578	Глюконат кальция (CALCIUM GLUCONATE)	acidity regulator, thickening agent	not less than 98,0 % and not more than 102 % on the anhydrous and monohydrate basis	-	2	-	-	-
E579	Глюконат железа (FERROUS GLUCONATE)	colour stabilizer	95 % on the dried basis	3	5	1	1	-

E580	Глюконат магния (MAGNESIUM GLUCONATE)	acidity regulator, antioxidant, thickening agent	Not less than 98,0% and not more than 102,0% on the anhydrous basis	-	2	-	-	-	-
E585	Лактат железа (FERROUS LACTATE)	colour stabilizer	96 % on the dried basis	3	5	1	1	-	-
E586	4-Гексилрезорцин (4-HEXYLRESORCINOL)	antioxidant	98 % on the dried basis	-	2	3	-	-	-
E620	Глутаминовая кислота, L(+)- (GLUTAMIC ACID, L(+)-)	taste and flavour booster	not less than 99,0 % and not more than 101,0 % on the anhydrous basis	-	2	-	-	-	-
E621	Глутамат натрия 1-замещенный (MONOSODIUM GLUTAMATE)	taste and flavour booster	Content not less than 99,0 % and not more than 101,0 % on the anhydrous basis	-	2	-	-	-	-
E622	Глутамат калия 1-замещенный (MONOPOTASSIUM GLUTAMATE)	taste and flavour booster	Content not less than 99,0 % and not more than 101,0 % on the anhydrous basis	-	2	-	-	-	-
E623	Глутамат кальция (CALCIUM GLUTAMATE)	taste and flavour booster	not less than 98,0 % and not more than 102,0 % on the anhydrous basis	-	2	-	-	-	-
E624	Глутамат аммония 1-замещенный (MONOAMMONIUM GLUTAMATE)	taste and flavour booster	not less than 99,0 % and not more 101,0 % on the anhydrous basis	-	2	-	-	-	-
E625	Глутамат магния (MAGNESIUM GLUTAMATE)	taste and flavour booster	not less than 95,0 % and not more than 105,0 % on the anhydrous basis	-	2	-	-	-	-
E626	Гуаниловая кислота (GUANYLIC ACID)	taste and flavour booster	than 97,0 % on the anhydrous basis	-	2	-	-	-	-
E627	5'-Гуанилат натрия 2-замещенный (DISODIUM 5'-GUANYLATE)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-	-
E628	5'-Гуанилат калия 2-замещенный (DIPOTASSIUM 5'-GUANYLATE)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-	-

E629	5'-Гуанилат кальция (CALCIUM 5'-GUANYLATE)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-
E630	Инозиновая кислота (INOSINIC ACID)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-
E631	5'-Инозинат натрия 2-замещенный (DISODIUM 5'-INOSINATE)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-
E632	Инозинат калия (POTASSIUM INOSINATE)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-
E633	5'-Инозинат кальция (CALCIUM 5'-INOSINATE)	taste and flavour booster	97,0 % on the anhydrous basis	-	2	-	-	-
E634	5'-Рибонуклеотиды кальция (CALCIUM 5'-RIBONUCLEOTIDES)	taste and flavour booster	Content of both major components not less than 97,0 %, and of each component not less than 47,0 % and not more than 53 %, in every case on the anhydrous basis	-	2	-	-	-
E635	5'-Рибонуклеотиды натрия 2-замещенные (DISODIUM 5'-RIBONUCLEOTIDES)	taste and flavour booster	Content of both major components not less than 97,0 %, and of each component not less than 47,0 % and not more than 53 %, in every case on the anhydrous basis	-	2	-	-	-
E636	Мальтол (MALTOL)	taste and flavour booster	99,0%, calculated on the anhydrous basis	-	1	-	-	-
E637	Этилмальтол (ETHYL MALTOL)	taste and flavour booster	99,0%, calculated on the anhydrous basis	-	1	-	-	-
E640	Глицин и его натриевая соль (GLYCINE AND ITS SODIUM SALT)	taste and flavour booster	98,5 % on the anhydrous basis	3	5	1	-	-

E650	Ацетат цинка (ZINC ACETATE)	taste and flavour booster	not less than 98 % and not more than 102 % of C <sub>4</sub> H <sub>6</sub> O <sub>4</sub> Zn · 2H <sub>2</sub> O	3	20	-	5	-
E900	Полидиметилсилоксан (POLYDIMETHYLSILOXANE)	anti-foaming agent, emulsifier, free flowing agent	Content of total silicon not less than 37,3 % and not more than 38,5 %	3	5	1	-	-
E901	Воск пчелиный, белый и желтый (BEESWAX, WHITE AND YELLOW)	coating agent, carrying agent		3	5	1	-	-
E902	Воск свечной (CANDELILLA WAX)	coating agent		3	5	1	-	-
E903	Воск карнаубский (CARNAUBA WAX)	coating agent		3	5	1	-	-
E904	Шеллак (SHELLAC)	coating agent		-	2	-	-	-
E905	Микрокристаллический воск (MICROCRYSTALLINE WAX)	coating agent		3	3	-	-	-
E905c(i)	Микрокристаллический воск (MICROCRYSTALLINE WAX)	coating agent In EU registered as E 905, in GSFA registered as INS 905 c						
E905d	Минеральное масло (высокой вязкости) - MINERAL OIL (HIGH VISCOSITY)	coating agent Authorization is ongoing in GSFA under the INS 905 a.						
E905e	Минеральное масло (средней и низкой вязкости, класс I) - MINERAL OIL (MEDIUM AND LOW VISCOSITY, CLASS I)	coating agent Not authorised in EU, In GSFA registered under INS 905 a.						

E907	Поли-1-децен гидрогенизированный (HYDROGENATED POLY-1-DECENE)	coating agent	Not less than 98,5 % of hydrogenated poly-1-decene, having the following oligomer distribution: C30: 13-37 % C40: 35-70 % C50: 9-25 % C60: 1-7 %	-	1	-	-	-
E912	Эфиры монтановой (октаоктановой) кислоты (MONTANIC ACID ESTERS)	coating agent		2	2	-	-	-
E914	Полиэтиленовый воск окисленный (OXIDIZED POLYETHYLENE WAX)	coating agent		-	2	-	-	-
E920	Цистеин, L-, и его гидрохлориды-натриевая и калиевая соли (CYSTEINE, L-, AND ITS HYDROCHLORIDES- SODIUM AND POTASSIUM SALTS)	flour treatment agent	not less than 98,0 % and not more than 101,5 % on the anhydrous basis	1,5	5	-	-	-
E927b	Карбамид (мочевина) – CARBAMIDE (UREA)	flour treatment agent, taste and flavour booster	99,0 % on the anhydrous basis	3	5	-	-	-
E928	Перекись бензоила (BENZOYL PEROXIDE)	flour treatment agent, preservative	96%	-	2	-	-	-
E938	Аргон (ARGON)	propellent, packaging gas	99%	-	-	-	-	-
E939	Гелий (GELLIUM)	propellent, packaging gas	99%	-	-	-	-	-
E941	Азот (NITROGEN)	propellent, packaging gas	99%	-	-	-	-	-
E942	Закись азота (NITROUS OXIDE)	propellent, packaging gas	99%	-	-	-	-	-
E943a	Бутан (BUTANE)	propellent, packaging gas	96%	-	-	-	-	-



E943b	Изобутан (ISOBUTANE)	propellent, packaging gas	94%	-	-	-	-	-
E944	Пропан (PROPANE)	propellent, packaging gas	95%	-	-	-	-	-
E948	Кислород (OXYGEN)	propellent, packaging gas	99%	-	-	-	-	-
E949	Водород (HYDROGEN)	propellent, packaging gas	99,9%	-	-	-	-	-
E950	Ацесульфам калия (ACESULFAME POTASSIUM)	sweetener	Not less than 99.0% and not more than 101.0% on the dried basis	-	1	-	-	-
E951	Аспартам (ASPARTAME)	sweetener, taste and flavour booster	Not less than 98% and not more than 102% on the dried basis	-	1	3 in EU, no reference in GSFA	-	-
E952	Цикламовая кислота и ее натриевая и кальциевая соли (CYCLAMIC ACID and Na, Ca salts)	sweetener						
	952(ii) CALCIUM CYCLAMATE		Not less than 98.0% and not more than 101.0% on the anhydrous basis	-	1	3 in EU, no reference in GSFA	-	-
	952(iv) SODIUM CYCLAMATE		Not less than 98.0% and not more than 101.0% on the dried basis Not less than 98.0% and not more than 102.0% in EU, 101.0% in GSFA	-	1	3 in EU, no reference in GSFA	-	-
E953	Изомальт, изомальтит (ISOMALT, ISOMALTITOL)	sweetener, free flowing agent, filling agent, carrying agent, coating agent	Not less than 98% of hydrogenated mono- and disaccharides and not less than 86% of the mixture of 6-O-alpha-D-glucopyranosyl-D-sorbitol and 1-O-alpha-D-glucopyranosyl-D-mannitol on the anhydrous basis	-	1	3 in EU, no reference in GSFA	-	-

E954	Сахарин (натриевая, калиевая, кальциевая соли) (SACCHARIN and Na, K, Ca salts) 954(i) SACCHARIN	sweetener	Not less than 99% and not more than 101.0% on the dried basis	-	3 in EU, no reference in GSFA	1	-	-	-
	954(ii) CALCIUM SACCHARIN		99% after drying 95% in EU, 99% in GSFA	-	3 in EU, no reference in GSFA	1	-	-	-
	954(iii) POTASSIUM SACCHARIN		Not less than 99% and not more than 101% on the dried basis	-	3 in EU, no reference in GSFA	1	-	-	-
	954(iv) SODIUM SACCHARIN		Not less than 99% and not more than 101% on the dried basis	-	3 in EU, no reference in GSFA	1	-	-	-
E955	Сукралоза (трихлоргалактосахароза) (SUCRALOSE (TRICHLOROGALACTO-SUCROSE))	sweetener	Not less than 98% and not more than 102% calculated on an anhydrous basis	-	-	1	-	-	-
E957	Тауматин (THAUMATIN)	sweetener, taste and flavour booster	Not less than 15.1% nitrogen on the dried basis equivalent to not less than 93% protein (N x 6.2)	-	3 in EU, no reference in GSFA	3	-	-	-
				Microbiological indices:					
				Aerobic microorganisms CFU/g, not more than	Escherichia coli, in 1 g				
				1000	Not allowed				

E959	Неогесперидин дигидрохалкон (NEOHESPERIDINE DIHYDROCHALCONE)	Sweetener(not in GSFA)			3 in EU.	2 in EU.		
E960	Стевиолгликозиды (STEVIO GLYCOSIDES)	sweetener			1 in EU and GSFA.	1 in EU and GSFA.		
E961	Неотам (NEOTAME)	sweetener		97,0 % on the dried basis	-	1	-	-
E962	Аспартам-ацесульфам соль ( SALT OF ASPARTAME- ACESULFAME)	sweetener		63.0% to 66.0% aspartame (dried basis) and 34.0% to 37.0% acesulfame (acid form on a dried basis).	-	1	-	-
E965	Мальтит и мальтитный сироп (MALTITOL AND MALTITOL SYRUP)	sweetener, stabilizer, emulsifier, carrying agent						

	965(i) MALTITOL		98.0%		3 in EU, no reference in GSFA	1	-	-
	965(ii) MALTITOL SYRUP		Not less than 99.0% of total hydrogenated saccharides on the anhydrous basis and not less than 50.0% of maltitol on the anhydrous basis		-	1	-	-
E966	Лактит (LACTITOL)	sweetener, carrying agent	Not less than 95.0% and not (more than 102.0% not in EU) on the anhydrous basis		-	1	-	-
E967	Ксилит (XYLITOL)	sweetener, humectant, stabilizer, emulsifier	Not less than 98.5% and not (more than 101.0% not in EU) on the anhydrous basis		-	1	-	-
E968	Эритрит (ERYTHRITOL) not in GSFA)	sweetener, humectant, stabilizer (				0,5 in EU		
E999	Квиллайи экстракт (QUILLAIA EXTRACTS)	foaming agent			2	5	1	-

E1200	Полидекстрозы (POLYDEXTROSES)	stabilizer, thickening agent, humectant, carrying agent	90 % of polymer on the ash free and anhydrous basis	-	0,5	-	-	-
E1201	Поливинилпирролидон (POLYVINYLPIRROLIDONE)	thickening agent, stabilizer, carrying agent	not less than 11,5 % and not more than 12,8 % of nitrogen (N) on the anhydrous basis	-	5	-	-	-
E1202	Поливинилпирролидон (POLYVINYLPIRROLIDONE)	colour stabilizer, stabilizer, carrying agent	not less than 11 % and not more than 12,8 % nitrogen (N) on the anhydrous basis	-	5	-	-	-
E1203	Поливиниловый спирт (POLYVINYL ALCOHOL)	humectant, coating agent		-	2	-	-	-
E1204	Пуллулан (PULLULAN)	coating agent, thickening agent	90 % of glucan on the dried basis	-	1	-	-	-
				Microbiological indices:				
				CGB (coliforms) in 25 g	Salmonella in 25 g	Yeast and molds KFU/g, not more than		
				Not allowed	Not allowed	100		
				Toxic elements, mg/kg, not more than				
				arsenic	lead	mercury	cadmium	heavy metals (in Pb)
E1400	Декстрины, крахмал, обработанный термически, белый и желтый (DEXTRINS, ROASTED STARCH WHITE AND YELLOW)	stabilizer, thickening agent		-	2	-	-	-

E1401	Крахмал, обработанный кислотой (ACID-TREATED STARCH)	stabilizer, thickening agent	-	2	-	-	-
E1402	Крахмал, обработанный щелочью (ALKALINE TREATED STARCH)	stabilizer, thickening agent	-	2	-	-	-
E1403	Крахмал отбеленный (BLEACHED STARCH)	stabilizer, thickening agent	-	2	-	-	-
E1404	Крахмал окисленный (OXIDIZED STARCH)	emulsifier, thickening agent, carrying agent	1	2	0,1	-	-
E1405	Крахмал, обработанный ферментными препаратами (STARCHES ENZYME-TREATED)	thickening agent	-	2	-	-	-
E1410	Монокрахмалфосфат (MONOSTARCH PHOSPHATE)	stabilizer, thickening agent, carrying agent	1	2	0,1	-	-
E1412	Дикрахмалфосфат, этерифицированный тринарийметафосфатом; этерифицированный хлорокисью фосфора (DISTARCH PHOSPHATE ESTERIFIED WITH SODIUM TRIMETASPHOSPHATE; ESTERIFIED WITH PHOSPHORUS OXYCHLORIDE)	stabilizer, thickening agent, carrying agent	1	2	0,1	-	-
E1413	Фосфатированный дикрахмалфосфат «сшитый» (PHOSPHATED DISTARCH PHOSPHATE)	stabilizer, thickening agent, carrying agent	1	2	0,1	-	-
E1414	Дикрахмалфосфат ацетилированный «сшитый» (ACETYLATED DISTARCH PHOSPHATE)	emulsifier, thickening agent, carrying agent	1	-	-	-	-

E1420	Крахмал ацетатный, этерифицированный уксусным ангидридом (STARCH ACETATE ESTERIFIED WITH ACETIC ANHYDRIDE)	stabilizer, thickening agent	1	2	0,1	-	-
E1422	Дихрамаладипат ацетилированный (ACETYLATED DISTARCH ADIPATE)	stabilizer, thickening agent, carrying agent	1	2	0,1	-	-
E1440	Крахмал оксипропилированный (HYDROXYPROPYL STARCH)	emulsifier, загуститель, carrying agent	1	2	0,1	-	-
E1442	Дихраммалфосфат оксипропилированный «сшитый» (HYDROXYPROPYL DISTARCH PHOSPHATE)	stabilizer, thickening agent, carrying agent	1	2	0,1	-	-
E1450	Эфир крахмала и натриевой соли октенилтантарной кислоты (STARCH SODIUM OCTENYL SUCCINATE)	stabilizer, thickening agent, emulsifier, carrying agent	1	2	0,1	-	-
E1451	Крахмал ацетилированный окисленный (ACETYLATED OXYDISSED STARCH)	emulsifier, thickening agent	1	2	0,1	-	-
E1452	Крахмала и алюминиевой соли октенилтантарной кислоты эфир (STARCH ALUMINIUM OCTENYL SUCCINATE)	stabilizer, coating agent	1	2	0,1	-	-

E1503	Касторовое масло (CASTOR OIL)	coating agent, free flowing agent, filling agent	99,00%	3	5	-	-	-
E1505	Триэтилцитрат (TRIETHYL CITRATE)	foaming agent, carrying agent		3 in EU, no reference in GSFA	5 in EU, will be modified in 2 to be in line with GSFA			
E1517	Диацетин (глицерилдиацетат) – DIACETIN (GLYCERYL DIACETAT)	humectant, carrying agent	94,00%	3	5	-	-	-
E1518	Триацетин (TRIACETIN)	humectant, carrying agent	98,00%	3	5	-	-	-
E1519	Бензиловый спирт (BENZYL ALCOHOL)	carrying agent	98,00%	-	5	-	-	-
E1520	Пропиленгликоль (PROPYLENE GLYCOL)	humectant, carrying agent	99,5 % on the anhydrous basis	-	5	-	-	-
E1521	Полиэтиленгликоль (POLYETHYLENE GLYCOL)	coating agent, stabilizer, carrying agent		-	1	-	-	-
-	Дигидрокверцетин (DIHYDROQUERCETIN)	Antioxidant Not authorised in EU and GSFA request rejected twice by EFSA due to lack of data						
-	Кверцетин (QUERCETIN)	Antioxidant Not authorised in EU and not in GSFA						
-	Красный рисовый (RED RICE)	colouring agent Not authorised in EU and not in GSFA						
-	Солодового корня (Glycyrrhiza sp.) extract	stabilizer, foaming agent Not authorised in EU and not in GSFA						

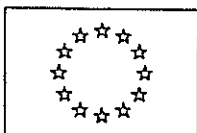
-	Мыльного корня (Acanthophyllum sp.) extract	stabilizer Not authorised in EU and not in GSFA							
		foaming agent							
-	Стевия (Stevia rebaudiana Bertoni), leaves powder and syrup; stevia extract	sweetener Not authorised in EU and not in GSFA							
-	Сукцинаты натрия, калия, кальция (NA, K, CA SUCCINATES)	acidity regulator Not authorised in EU and not in GSFA							
-	Хитозан, гидрохлорид хитозония (CHITOSAN, CHITOSON HYDROCHLORIDE)	filling agent, thickening agent, stabilizer Not authorised in EU and not in GSFA							

For information, in the EU, purity criteria are currently mentioned in Directives 2008/128/EC as amended, 2008/84/EC as amended and 2008/60/EC as amended. They are going to be merged into one EU Regulation by March 2012. The Draft proposal for this EU Regulation has been voted recently (4.07.2011). In this draft some corrections of errors and omissions of the current legislation are proposed. Some of them relate to a change of the names, i.e. E 160 a, E 160b, E 466, E 469, E 960 steviol glycosides have been also included.

Remarks:

"Codex General Standard for Food Additives" (GSFA, Codex STAN 192-1995)  
European Food Safety Authority (EFSA)





EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Veterinary and International affairs  
EU-SPS relations with the Custom Union between Russia, Belarus and Kazakhstan  
Head of the Task Force

Brussels, 20 SEP. 2011  
SANCO G7/LC/mh D(2011)

Dear Mr Sadvakasov, dear Mr Glazyev,

Following our letter Ref. Ares(2011)931229 of 01/09/2011, we would like to submit the attached first comments on the draft Customs Union Technical Regulation on specialised food products. Further EU comments might be submitted subsequently.

We would be grateful to know to what extent these comments will be taken into account in the final version of the Technical Regulation.

Yours sincerely,

Paul van Geldorp

Enclosure: List of destinees;  
EU comments on the draft CU TR on specialised food products.

List of destinees:

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Legal reference	Content	Comment
Article 4. Definitions	<p>specialized food products</p> <p>food products for which the requirements for the content and (or) the proportion of certain substances or all substances and components are established for the purpose of safe usage of these food products by certain categories of people, and (or) the content and (or) the proportion of certain substances in relation to their natural content in such products is changed; and (or) the composition includes substances or components which were not initially present in such products; and (or) the manufacturer declares their curative and (or) prophylactic properties;</p>	<p>it would be useful to clarify if the rules are covering meat products that have reduced fat content compared to traditional meat products.</p> <p>Fat-reduced meat products are consumed by healthy people who want to reduce their energy consumption. Therefore there should not be specific safety requirements for content of bacteria and mold in such products compared to other meat products.</p>
Remarks:	<p>- There should be more consistency within the different CU legislation, in particular between the different technical regulations (TRs) and with CU Decision No 299. New CU legislation should be aligned with international agreements.</p> <p>- This regulation overlaps with the draft TR of CU on Food Safety. Only table 1 is slightly different.</p> <p>- The EU requests clarification of why microbiological criteria for raw milk, 1st and 2nd grade, are mentioned in this TR. It is not clear for what kind of specialised food this type of raw milk (1st and 2nd grade) is allowed in CU as raw material.</p> <p>- The EU noted that almost all dairy products are mentioned in this TR and not only special dietary food products. What is the relation between this TR and the CU draft TR for milk and dairy products?</p> <p>The EU requests to ensure that no overlap occur between the different TR, using as appropriate cross references!</p> <p>- Except for standards for infant and baby formula, setting specific food standards for children could be unnecessarily trade restrictive. Less trade restrictive measures, such as regulations on health claims and labelling rules should be used. The same applies for pregnant and nursing women.</p> <p>In this perspective, <i>Codex Alimentarius</i> Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997), General Guidelines on Claims (CAC/GL 1-1979), General Standards for the Labelling of and Claims for Special Dietary Uses (CODEX STAN 146-1985), Standard for the Labelling of and Claims for Foods for Special Medical Purposes (CODEX STAN 180-1991), should serve as a reference. As regards infant and baby formula, <i>Codex Alimentarius</i> Standard for Infant Formula and Formulas for Special Medical Purposes intended for Infants (CODEX STAN 72 – 1981) should be used as reference.</p>	

EU comments are included in the appendix in bold.

Appendix No. 1  
to Technical Regulations  
of the Customs Union  
"On safety of specialized food products,  
dietary and curative and  
prophylactic food products"

**Microbiological Safety Standards  
(Pathogenic)**

Concerning food non-preserved products, including for child nutrition, subject to standardisation are pathogenic micro-organisms, including salmonellae and Listeria monocytogenes; Yersinia-type bacteria (if there is an epidemic situation in the region of production); Enterobacter sakazakii (in products for babies since birth).

Indicator	Group of products	Mass of product (g), for which shall not be allowed
Pathogenic micro-organisms, including salmonellae	Sugar-containing confectionery products, chewing gum, cacao products, chocolate and chocolate products, flour confectionery products	50 – products for diabetics
	Special fats, mayonnaises, margarines, spreads, vegetable oil creams, raw tallow from slaughter animals, salted pork.	25
	Milk-based products for pregnant and nursing women	50
	Food products for infants, including for dietary therapy (except for sterilized, ultra-pasteurized with aseptic pre-packing)	100
Listeria monocytogenes	Milk-based and soya-based products for pregnant and nursing women	50 (50 - complementary food products, dried high and low-protein sublimated products)
	<b>Products for infants:</b>	25 - for dry products from milk and cereals
Enterobacter sakazakii	Instant-type dry and liquid milk mixtures, milk-based products for dietary therapy, including infant milk kitchen, for prematurely born (except for sterilized and aseptically packed products).	100
	Milk mixtures for children since birth and instant-type dry milk cereal dishes for children from 4 months, dry products for dietary therapy and for prematurely born children, milk products of infant milk kitchen for children since birth	300 in case of detection of Enterobacteriaceae-type bacteria belonging neither to E. coli nor to salmonellae, in the standardized amount

Although the draft Technical Regulation has been developed with regard to (EC) Regulation 2073/2005 the requirements for Products for infants is stricter than the requirements of this Regulation, which could result in trade restrictions. In Regulation (EC) No 2073/2005 (Chapter 1.Food safety

criteria), the *Listeria monocytogenes* criteria for "Ready-to-eat foods intended for infants and ready-to-eat foods for special medical purposes" is absence in 25 g, and the *Enterobacter sakazakii* criteria for "Dried infant formulae and dried dietary foods for special medical purposes intended for infants below six months of age" is absence in 10 g. So for Appendix 1, the CU criteria for infant is stricter than EU and extended to a possibly wider range of products, for which the EU did not consider it necessary to set a standard.

We request a further alignment for the microbiological standards with the standards contained in the EU regulation, or to be provided with the microbiological assessment that was used to set such standards.

Appendix No. 4  
 To Technical Regulations  
 of the Customs Union  
 "On safety of specialized food products,  
 dietary, curative and prophylactic food products"

Acceptable Levels of Radionuclides of Caesium-137 and Strontium-90

No.	Food groups	Specific activity of caesium-137, Be/kg (l) We suggest the wording "Bq/kg"	Specific activity of strontium-90, Be/kg (l) We suggest the wording "Bq/kg"
1.	Meat, meat products and by-products	200	-
2.	Venison, meat of wild animals	300	-
3.	Fish and fish products	130	100
4.	Fish jerked and dried	260	-
5.	Milk and milk products	100	25
6.	Milk concentrated and condensed, milk preserves	300	100
7.	Powdered milk	500	200
8.	Vegetables, root crop including potatoes	80 (600 <sup>(2)</sup> )	40 (200 <sup>(2)</sup> )
9.	Bread and bun products	40	20
10.	Flour, cereals, flakes, food cereals, pasta,	60	-
11.	Wild berries and preserved products therefrom	160(800 <sup>(2)</sup> )	-
12.	Fresh mushrooms	500	-
13.	Dried mushrooms	2500	-



EUROPEAN COMMISSION  
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Deputy Director General for the food chain

Brussels,  
D(2011)

Dear Ms Shevireva, dear Mr Glazyev,

I refer to my letter of 10 August 2011 (Ref Ares (2011)870690 to you requesting for the possibility to submit comments on the draft CU Technical Regulation on Milk and Milk Products published on 21 July 2011 on the website of the Customs Union (CU), but not undergoing the public consultation foreseen by CU Decision 625.

The EU comments are attached in annex, the form of suggested amendments to the existing draft technical regulation. The EU would also request a further development of this text as regards the hygienic prescriptions for producing establishments (design and functioning), and that these prescriptions are aligned with Codex Alimentarius Recommended Code of hygienic practice for milk and milk products. This would provide further guidance and more transparent indications to foreign producers on the expectations they are supposed to meet when producing for the CU market. EU regulation and requirements are also indicated, as they may constitute an additional harmonisation objective, which would benefit to CU products intended for the EU market.

I therefore request the attached comments to be taken into account for the future developments of this technical regulation, in order to achieve a high level of harmonisation with the international standards guidelines and recommendations.

Yours sincerely,

Ladislav Miko

Enclosure EU comments on the TR on milk and dairy developed by the Customs Union.

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**EU comments on the Draft Technical Regulations of the Eurasian Economic Community Customs Union on Milk and Dairy Products.  
September 2011**

Legal reference	Content	EU Comment
Article 2.1	Milk means the product of the standard physiological secretion of the mammary glands of livestock obtained from one or several animals during the lactation period after one or several sets of milking without adding or extracting any substances out of this product.	This article could confirm that this regulation applies to the species covered in the annex 3, tables 1 and 2.
Article 2.2	Dairy products mean milk derivatives including a dairy product, dairy component product, milk-containing product, by-product from milk processing, child nutrition products based on milk, milk mixtures (including dry baby milkmixture), milk drinks (including dry milk drinks) for babies, milk porridge.	Please clarify in the definitions the difference between 2) Dairy products and 3) Dairy product. The current definitions are unclear.
Article 2.3	Dairy product means a food product made of milk and (or) its components and (or) dairy products with or without addition of by-products from milk processing (excluding by-product from milk processing obtained during production of milk-containing products) without any use of non-dairy fat and protein and the composition of which may contain components functionally necessary for milk processing.	



<p>Article 2.4</p>	<p>Dairy component product means a food product made of milk and (or) its components and (or) dairy products with or without addition of by-products from milk processing (excluding by-products from milk processing obtained during production of milk-containing products) and non-dairy products which are added not for the purpose of replacing milk components. The end product shall contain over 50 per cent of milk components and ice-cream over 40 per cent.</p>	<p>Please clarify the definition. It is difficult to understand what kind of products or ingredients are covered under dairy component product. The CU could consider instead developing a definition of a "dairy ingredient"</p>
<p><b>Article 2.2 : EU requests this TR to set requirements for protection of human life and health be detailed as regards the hygienic design and function of producing establishments aligned with relevant international standards: CAC RCP 57-2004 should be taken into account, in particular the following sections of the Recommended Code of Hygienic Practice 57-2004, combined with sections of the CAC RCP 1-1969 Rev.4 (2003):</b></p> <ul style="list-style-type: none"> <li>- section 4 as regards establishment design and facilities</li> <li>- section 5 as regards control of operation</li> <li>- section 6 as regards maintenance and sanitation</li> <li>- section 7 as regards personal hygiene</li> </ul> <p>And relevant annexes in CAC RCP 57-2004</p> <p>The CU requirements could incorporate the objectives described in these sections. CU should include a recognition of other measures which would achieve the same level of safety as the one resulting from the CU requirements.</p>		
<p>Article 3. Rules of Distribution in the Market</p>		<p>Further clarification is needed of the conditions for acceptance of import into the CU from foreign countries.</p>

<p>Article 3.2</p>	<p>The document confirming the right of distributing milk and dairy products in the market shall be a certificate of state registration or a declaration of compliance of these products with the requirements of these Technical Regulations registered by an authorized accredited certification agency in any state-member of the Customs Union; Products which have already undergone state registration do not need any additional declaration of compliance. For products of non-industrial (home) production and raw milk a confirming document shall be veterinary documents.</p>	<p>The EU requests clarification on the cases in which a declaration of conformity is needed and the cases in which a state registration is needed. The EU requests for the provisions foreseen in art 24 of the TR on food safety to be applied, i.e., a declaration by the producer of processed food products <u>could be based on own evidence or with the participation of a third party.</u></p>
<p>Article 3.4</p>	<p>Documents of compliance evaluation (approval) obtained outside the territory of the Customs Union including documents about testing third-country products imported for distribution on the territory of the Customs Union shall be confirmed provided all the states-members of the Customs Union have joined corresponding international treaties.</p>	<p><u>EU requests the inclusion of an article 3.4 bis, to allow for alternative measures to be applied provided they achieve an equivalent level of safety.:</u></p> <p>"Foreign products imported for placing on the market in CU should provide for a level of safety at least equivalent to the one resulting from the CU technical regulations requirements, and other measures than those provided for in this Regulation may be recognised for such products."</p>
<p>Article 3.8</p>	<p>In delivering raw milk, raw skimmed milk, raw cream to milk collecting stations or milk processing enterprises legal entities, private entrepreneurs and individuals shall present veterinary supporting documents issued by an authorized agency of the state-member of the Customs Union confirming safety of the raw milk, raw skimmed milk, raw cream.</p>	<p><u>EU request to indicate that this obligation cover the entrepreneurs and the individuals of the CU. Foreign product would not normally deliver to collecting stations in the CU.</u></p>

<p>Articles 3. 9 and 3.10 and 3. 11</p>	<p>3.9. In case of revelation of cases when raw milk is non-conforming at the stage of production, raw skimmed milk, raw cream are non-conforming at the stage of transportation for industrial processing to the requirements of these Technical Regulations in terms of safety as well as in cases of livestock diseases which require limited use of or prohibition of raw milk, raw skimmed milk, raw cream, the executive body of the state-member of the Customs Union authorized for performing state control (supervision) in the veterinary area shall issue an order to suspend sale and delivery of such products.+ <b>EU addition (idem at the end of para 3.11)</b> <b>Insertion at the beginning of 3.10</b></p>	<p>To be consistent with the case definition mentioning the need for "limited use" (and not only prohibition), there should be a possibility not only to suspend sale and delivery, but also to limit the use of such products. EU requests to add the following words at the end of para 9 and 11 " <b>or limit the use of such product</b>" And insert in 3.10 Suspension of production and sale " <b>or limitation in the use of</b>" ...</p>
<p><b>Article 4. Safety Requirements</b></p>		
<p><b>4.1 Safety requirements to raw milk, raw skimmed milk and raw cream</b></p>		
<p><b>This section could add objectives as set in the CAC RCP overarching principles 2.3 of CAC RCP 57-2004.</b></p>		
<p><b>A section on the hygienic design and functioning of processing of the establishments following the above mentioned RCP objectives could be added, indicating the expected features of milk and dairy producing establishments.</b></p>		
<p>Article 4.1 point 3</p>	<p>Use of products from processing raw milk obtained within the first seven days after the calving of animals and within five days before their initiation (before the calving) and (or) from ill animals and animals in quarantine shall not be allowed.</p>	<p>The EU requests to <u>modify this interdiction</u> and allowed to use colostrum for special products (see R853/2004). It is one of the EU's export products. There is not EU definition of the colostrum phase but it should be reduced. According to scientific literature the composition of milk is normalized after 8 milkings (4 days).  EU rules for colostrum products are laid down in Regulation (EC) No 853/2004, Annex III, Section IX.</p>
<p>Article 4.1 point 6</p>	<p>The allowable levels of potentially dangerous substances in raw milk, raw skimmed milk and raw cream shall not exceed the permissible level established in Supplement 1 of these Technical Regulations.</p>	<ul style="list-style-type: none"> <li>• Penicillin</li> </ul> <p>See comments in annex.</p> <p>The residues should only be looked for in the raw material as normally there is no use of penicillin in the process. Official controls by national monitoring plans should be recognised as a valid way of monitoring these levels. Self checks performed by the establishments should also be recognised; the daily frequency of testing should not be mandatory but the frequency should be adapted according to the risk and previous experience of the operator.</p>

• Melamine  
the CU proposals are not in line with the new provisions of the Codex Alimentarius adopted in 2010, see comments in annex.

Previous EU comments in FL88

§ Chemicals:

The EU has set a level of lead in milk (0.02mg/kg).

All these contaminants are regulated in the feed of the animals, which is the main route of contamination. (Directive 2002/32/EC on undesirable substances in animal feed, maximum levels for 39 contaminants in feed set in annex I).

Regulation (EC) No 1881/2006 also refers to the scientific opinion having led to the setting of the EU maximum levels:  
wheareas

(40) In the framework of Directive 93/5/EEC 2004 the SCOOP-task 3.2.11

'Assessment of the dietary exposure to arsenic, cadmium, lead and mercury of the population of the EU Member States' was performed in 2004 (2). In view of this assessment and the opinion delivered by the SCF, it is appropriate to take measures to reduce the presence of lead in food as much as possible

(41) As regards cadmium, the SCF endorsed in its opinion of 2 June 1995 (3) the PTWI of 7 µg/kg bw and recommended greater efforts to reduce dietary exposure to cadmium since foodstuffs are the main source of human intake of cadmium. A dietary exposure assessment was performed in the SCOOP-task 3.2.11.

In view of this assessment and the opinion delivered by the SCF, it is appropriate to take measures to reduce the presence of cadmium in food as much as possible.

(42) As regards mercury EFSA adopted on 24 February 2004 an opinion related to mercury and methylmercury in food (1) and endorsed the provisional tolerable weekly intake of 1,6 µg/kg

bw. Methylmercury is the chemical form of most concern and can make up more than 90 % of the total mercury in fish and seafood. Taking into account the outcome of the SCOOP-task

3.2.11, EFSA concluded that the levels of mercury found in foods, other than fish and seafood, were of lower concern. The forms of mercury present in these other foods are mainly not methylmercury and they are therefore considered to be of lower risk.

§ Aflatoxin M1:

The EU required level for milk is 10 times lower than the RF level. Monitoring is performed on the basis of national plans.

2.1.8 Raw milk (6), heat-treated milk and milk for the manufacture of milk-based products 0,050 micrograms/ kg

§ Antibiotics:

		<p>Chloramphenicol is banned in the EU and is regularly monitored as well as other substances which are authorised. The detection level for chloramphenicol is 0.3 microgram/kg.</p> <p>The RF requirement of absence of residues in food makes it necessary to define what the detection level is, and which detection methods are used.</p> <p>For the 4 antibiotics families for which no residues are allowed in food, a scientific cooperation with the RF has been launched to assess how the MRLs adopted in the EU fit the safety objectives of the RF.</p> <p>§ Pesticides EU MRL in milk and cream, not concentrated, nor containing added sugar or sweetening matter, butter and other fats derived from milk, cheese and RFrd: DDT : the substance is forbidden in the EU. The MRL in milk products is 0,04 mg/kg Hexachlorocyclohexane (HCH), alpha-isomer (F): 0,004 mg/kg Hexachlorocyclohexane (HCH), beta-isomer (F): 0,003 mg/kg</p> <p>§ Radionuclides: Although there are no maximum levels in the EU legislation, the EU has put in place since the Chernobyl incident, a monitoring of radionuclides, which covers milk and milk products. The results of the monitoring show that the levels are much lower than the levels set in the RF for cesium and strontium. Such monitoring should be recognised as valid for the objective pursued by the CU technical regulation.</p> <p>-Raw milk requirements, eg. somatic cell count and total bacterial count: RF sets limits, EU has a rolling average over two or three months; i.e. even if the limits are surpassed occasionally there are no restrictions/measures for the EU-farmer.</p> <p>- The limits for chemicals, microorganisms and antibiotic residues differ from EU-law. Especially for parameters like salmonella a testing regime should be defined, as even a high number of samples cannot guarantee 'absence of'.</p> <p><u>Previous EU comments in FL88</u> -Regulation (EC) No 853/2004, Section IX.III. Criteria for raw milk: 3.(a) Food business operators must initiate procedures to ensure that raw milk meets the following criteria: (i) for raw cows' milk: Plate count at 30 °C (per ml) ≤ 100 000 (* Rolling geometric average over a two-month period, with at least two samples per month.*) National provisions may foresee that payment to the farmers is reduced when individual results are above 100 000. (i) for raw cows' milk: Somatic cell count (per ml) ≤ 400 000 (**) (**) Rolling geometric average over a three-month period, with at least one sample per month, unless the competent authority specifies another methodology to take account</p>
<p>Article 4.1 point 7</p>	<p>The allowable levels of microorganisms and somatic cells in raw milk, raw skimmed milk and raw cream shall not exceed the standards established in Supplement 2 of these Technical Regulations.</p>	

		<p>of seasonal variations in production levels.</p> <p>-The somatic cell count is an indicator of the dairy cows' health (absence of mastitis). At a low level, there is no significant difference in the composition of milk: nature and quality of proteins, lactoferrins, enzymes, level of immunoglobulin in milk.</p> <p>-QMAFAnM – the quantity of mesophilic aerobic and facultative anaerobic microorganisms corresponds to total plate count. See comments on art 5.7 b of the RF Federal law (level 100 000 cells per ml in the EU).</p> <p>Pathogens:</p> <p>Regulation (EC) No 2073/2005 foresees microbiological criteria for Salmonella in cream made from raw milk: absence in 25 g.</p> <p>There is no EU criteria set for raw milk, only for the end product (cheese made from raw milk, absence in 25 g).</p> <p>if raw milk would be destined to direct human consumption, a general requirement for food safety (in Regulation (EC) No 178/2002) would imply absence of Salmonella.</p> <p>Article 10.8a of Regulation (EC) No 853 states: 8. A Member State may, of its own initiative and subject to the general provisions of the Treaty, maintain or establish national rules:</p> <p>(a) prohibiting or restricting the placing on the market within its territory of raw milk or raw cream intended for direct human consumption"</p> <p>Other pathogens: Listeria in ready to eat food</p> <p>Previous EU comments in FL88</p> <p>-QUALITY ASPECTS The identification parameters referred to in addendum 9 of the Federal Law are generally covered, for the minimum values for fats and proteins, in Regulation 1234/2007, with similar figures. Fats and proteins, which are the essential parameters for processing, are monitored for the quality modulation of the payment of the farmers. The EU legislation has however not fixed maximum values. It is justified as these parameters are closely related to the physiology of the animals (e.g. higher protein content depending on the cow breed).</p> <p>-Addendum 10 concerns raw cream, which the EU does not export to the RF.</p>
<p>Article 4.1 point 8</p>	<p>The identification indices for cow raw milk, cow raw skimmed milk and cow raw cream are specified in Supplements 3 and 4 of these Technical Regulations.</p>	<p><b>4.2. The requirements to special production processes in manufacturing, storage, transportation and disposal of raw milk, raw skimmed milk and raw cream</b></p>
<p>Article 4.2 point 2</p>	<p>After livestock milking raw milk shall be refined and cooled to the temperature of 4 degrees Celsius plus/minus 2 degrees Celsius for no more than 2 hours.</p>	<p>-This temperature can be achieved especially with the 2 degree variance allowed. However the 24 hr storage limit for infant formula is again restrictive and should be opposed. They define this age group as 0 to 3 years,</p> <p>-Too strict in comparison to EU regulations, See discussion FL88 "storage of raw milk" and R853/2004 Section IX, Chapter I, IIB.</p>

<p>Article 4.2 point 3</p>	<p>Before industrial processing it is allowed to store raw milk, raw skimmed milk (including the storage period of raw milk used for skimming) under the temperature of 4 degrees Celsius/plus/minus 2 degrees Celsius, raw cream under the temperature not higher than 8 degrees Celsius for no more than 36 hours including transportation time. Before industrial processing it is allowed to store raw milk, raw skimmed milk (including the storage period of raw milk used for skimming), raw cream intended for babies' nutrition products under the temperature of 4 degrees Celsius plus/minus 2 degrees Celsius for no more than 24 hours including transportation time.</p>	<p>-Max. of 36 hours from milking until beginning of processing. In the EU there are no limits for the time between milking and collection of milk or beginning of processing. Most commonly the milk is collected in 48-hour-intervals.  <b>EU requests alternative measures to be recognised, based on the safety outcome.</b></p> <p>-Temperature for storage and transport: 4 +/- 2 °C, during transport a max. temperature of 10°C is allowed      -now „for no more than 2 hours“, old „within 2 hours“ (Art. 6, Nr. 2 TR 88). Probably an inaccurate translation. Otherwise, not only the time for cooling down but also for storage would be limited to two hours.</p> <p>In any case difficulties may rise as EU requirements permit different temperature and time frames. <b>EU requests alternative measures to be recognised, based on the safety outcome.</b></p> <p>-Raw Milk processing must be performed by 36 hours since it was milked, including transport.</p>
<p>Article 4.2 point 4</p>	<p>It is allowed to perform preliminary heat treatment, including pasteurization, of raw milk, raw skimmed milk and raw cream by the manufacturer in the following cases:</p> <ol style="list-style-type: none"> <li>1) the acidity of raw milk, raw skimmed milk is from 19 to 21 Turner degrees, the acidity of raw cream is from 17 to 19 Turner degrees;</li> <li>2) storage of raw milk, raw skimmed milk and raw cream for more than 6 hours;</li> <li>3) transportation of raw milk, raw skimmed milk and raw cream the duration of which exceeds the permissible storage period but not more than for 25 per cent.</li> </ol>	<p>-In article 4, point 2 it is not indicated which infectious diseases the herd should be free of and what should be the period of such a freedom.</p>
<p>Article 4.2 point 7</p>	<p>During transportation of cooled raw milk, raw skimmed milk and raw cream to the place of processing and till the moment of their processing the temperature of these products shall not exceed 10 degrees Celsius. Raw milk, raw skimmed milk and raw cream non-conforming to the established temperature requirements shall be subject to immediate processing.</p>	

<p>Article 4.2. point 8</p>	<p>Transportation of raw milk, raw skimmed milk and raw cream shall be carried out in containers with tight lids made of materials allowed for contact with milk in accordance with the law of the state-members of the Customs Union in the area of sanitary and epidemiological safety of the population. They shall also be sealed. The means of transportation shall maintain the temperature established by these Technical Regulations.</p>	<p>Difference in the requirement concerning sealing of raw milk transport in provisions of the EU and RF.  <b>EU requests alternative measures to be recognised, based on the safety outcome.</b></p>
<p><b>4.3. Requirements to dairy products</b></p>		
<p>Article 4.3. point 3</p>	<p>The allowable levels of potentially dangerous substances in milk derivatives shall comply with the requirements specified in Supplement 5.  "Definition of residual quantities of potentially dangerous substances not indicated in Supplement 5 shall be done on the basis of information about their application provided by the manufacturer of alimentary raw materials and food products during their import to the uniform RFstoms territory of the RFstoms Union."</p>	<p>2nd sentence needs clarification. Does this mean that MRLs on substances not listed in supplement 5 will be set randomly at the time of import?   EU legislation (Commission Regulation (EC) No 1881/2006 of 19 December 2006 setting maximum levels for certain contaminants in foodstuffs) in contradiction to RF Technical Regulation does not establish maximum levels of arsenic, cadmium and mercury for milk, cream, butter, cottage cheese, dry milk, cheese and cheese products as well as maximum level of benzo(a)pyrene for smoked cheese.</p>



<p>Article 4.3. point 4</p>	<p>The allowable levels of microorganisms in milk derivatives upon their release for distribution shall not exceed the standards established in Supplement 6.</p>	<p>For cheese is mentioned a limit of 0.001 in g/ cm3 of CGB coliforms. In the EU an examination on staphylococcus enterotoxins may be performed. <b>EU requests alternative measures to be recognised, based on the safety outcome.</b></p> <p>Industrial sterility requirements are stricter for condensed milk and amount to 6 days (see page 46 ); however for sterilized and ultrapasteurized milk, the requirements still amount to 3-5 days (see page 42)</p> <p>Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs lays down the microbiological criteria for E. Coli in cheeses, butter and cream made from raw milk. However, the RF Technical Regulation lays down the microbiological criteria for E. Coli in all types of milk products. <b>EU requests alternative measures to be recognised, based on the safety outcome.</b></p> <p><u>Previous EU comments in FL88</u> -Regulation (EC) No 2073/2005, Annex I and Annex II, taking the relevant criteria for dairy and infant formula. The lower EU level for total plate count has to be taken into account when comparing the different approaches for specific microbiological criteria. Since the RF has much higher authorised levels of total plate count, the RF needs to be more stringent on microbiological criteria. The milk which is being exported has been processed, often pasteurized. The aim of pasteurisation is to kill all pathogens contained in raw milk. Additionally, all microbiological hazards must be managed through the HACCP plans.</p> <p>In addition, see the Strategy Paper explaining the EU approach for setting microbiological criteria at the following web address: <a href="http://ec.europa.eu/food/food/biosafety/salmonella/discussion_paper_en.pdf">http://ec.europa.eu/food/food/biosafety/salmonella/discussion_paper_en.pdf</a> -This requirement is tackled in the safety assessment and purity criteria implemented according to articles 6 and 7 of Regulation (EC) No 1332/2008 on food enzymes -Why are upper-limit for "Protein (in product), at least" for some products (EU norm min. 34% on nonfat dry matter.) -Fat criteria for "Butter, including:" of 50.0 - 85.0 %, does this product group include "half butter"? (Codex: min. milk fat in butter ≥ 80%.);</p>
<p>Article 4.3. point10</p>	<p>The identification chemical and physical and microbiological indices of products from milk processing are regulated by Supplement 8 of these Technical Regulations.</p>	<p>In addition, see the Strategy Paper explaining the EU approach for setting microbiological criteria at the following web address: <a href="http://ec.europa.eu/food/food/biosafety/salmonella/discussion_paper_en.pdf">http://ec.europa.eu/food/food/biosafety/salmonella/discussion_paper_en.pdf</a> -This requirement is tackled in the safety assessment and purity criteria implemented according to articles 6 and 7 of Regulation (EC) No 1332/2008 on food enzymes -Why are upper-limit for "Protein (in product), at least" for some products (EU norm min. 34% on nonfat dry matter.) -Fat criteria for "Butter, including:" of 50.0 - 85.0 %, does this product group include "half butter"? (Codex: min. milk fat in butter ≥ 80%.);</p>
<p>4.5. Requirements to production and distribution of dairy products All</p>		<p>HACCP is not mentioned. <b>EU requests production based on the HACCP principles and prerequisite requirements to be considered equivalent to the Technical regulations?</b></p>

<b>4.6. Requirements to child nutrition products based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks) for babies, milk porridge</b>	
All	<p>The EU only regulates specifically dairy food for children until 1 year of age, on compositional aspects and safety criteria. Above this age, the food is regulated by the texts covering products for all consumers, with the exception of specific nutritional criteria for foodstuff intended for particular nutritional uses (Directive 39/2009/EC)</p> <p>The EU proposes to consider the equivalence on the dairy products for children under 1 year of age.</p>
Article 4.6 point 1	<p>"The terms and definitions of child nutrition products based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks) for babies, milk porridge characterizing specific child nutrition products shall be established by the national standards of the state-members of the Customs Union with the use of the main general terms of milk derivatives including child nutrition products established by these Technical Regulations."</p>
Article 4.6 point 2	<p>The allowable levels of oxydative spoilage and potentially dangerous substances in child nutrition milk products for babies are specified in Supplement 9. The allowable levels of microorganisms in child nutrition products based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks), milk porridge for babies including in products produced in infant feeding centres are specified in Supplement 10 of these Technical Regulations.</p>
Article 4.6 point 3	<p>The allowable levels of oxydative spoilage and potentially dangerous substances in milk and milk complex products of child nutrition for preschool and school children are specified in Supplement 11 of these Technical Regulations.</p>
	<p>In some paragraphs (see also article 4.1. point 5) it is clearly stated that the national law of the CU members applies. Please indicate which national legislation set such standards.</p>
	<p>Dioxins: "not allowed" (natural) background values should be taken in consideration." Request for detection limits.</p> <p>Dioxins and Melamine: A zero-tolerance policy without indicating a detection limit is not acceptable from a scientific point of view.</p>
	<p>Could the CU justify the classification of dairy products for toddlers to school-age children.</p>

<p>Article 4.6 point 5</p>	<p>The physical and chemical identification indices for child nutrition products based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks), milk porridge for babies are specified in Supplement 13 of these Technical Regulations.</p>	<p>Previous EU comments in FL88 Addendum 13 and 14: The EU legislation on food intended for infants and young children is covered by the following pieces of legislation: - Commission Directive 2006/141/EC of 22 December 2006 on infant formulae and follow-on formulae - Commission Directive 2006/125/EC of 5 December 2006 on processed cereal-based foods and baby foods for infant and young children - Commission Directive 1999/21/EC of 25 March 1999 on dietary foods for special medical purposes Any product that does not fall into the categories covered by the above Directives would be covered by the framework legislation: - Directive 2009/39/EC of the European Parliament and of the Council of 6 May 2009 on food intended for particular nutritional uses (recast).</p>
<p>Article 4.6 point 6</p>	<p>The physical and chemical identification indices for child nutrition products based on milk for preschool and school children are specified in Supplement 14 of these Technical Regulations.</p>	<p>Specific EU comments have been included in bold in addendum 13 and 14, attached.</p>
<p>Article 4.6 point 24</p>	<p>The nutritive value of child nutrition products based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks) for babies, milk porridge shall comply with the level established in Supplement 13.</p>	<p>The EU is meeting the same food safety objective as the RF</p>
<p>Article 4.6 point 25</p>	<p>Child nutrition products based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks) for babies, milk porridge shall not contain any components obtained with the use of genetically modified organisms, artificial colouring agents and flavours.</p>	<p>Previous EU comments in FL88 EU products not labeled with a mention related to GMO comply with this requirement. Regulation (EC) No 1830/2003 on the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms Article 4 Traceability and labelling requirements for products consisting of or containing GMOs B. Labelling 6. For products consisting of or containing GMOs, operators shall ensure that: (a) for pre-packaged products consisting of, or containing GMOs, the words 'This product contains genetically modified organisms' or 'This product contains genetically modified [name of organism(s)]' appear on a label;  In the EU only natural flavourings are allowed in dairy food for children under 1 year of age. It is proposed to recognize this measure equivalent for that category.</p>

<p>Article 4.6 point 29</p>	<p>The form of application of vitamins and mineral substances used in production of child nutrition products for babies based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks) for babies, milk porridge is specified in Supplement 5 to these Technical Regulations. The content of vitamins and mineral substances in child nutrition products shall correspond to the level specified in Supplement 16 to these Technical Regulations.</p>	<p><u>Previous EU comments in FL88</u>  Addenda 16 and 17 of the RF legislation give a more restrictive list of vitamins, minerals and additives allowed to be used in the dairy products for children.</p> <p>The EU allows more substances to be used based on safety criteria.  Regulation (EC) No 1331/2008 establishing a common authorisation procedure for food additives, food enzymes and food flavourings.  The regulation provides for an efficient, centralised, transparent and time-limited authorisation procedure for food additives, food enzymes and flavourings.  The regulation will apply from the date of application of the implementing measures, which shall be adopted by 16 December 2010.</p> <p>Regulation (EC) No 1332/2008 on food enzymes:  This regulation creates harmonised rules for their scientific evaluation and authorisation in the Community.</p> <p>This regulation applies from 20 January 2009, except labelling provisions from 20 January 2010. National provisions concerning the placing on the market and use of food enzymes and food produced with food enzymes continue to apply in the Member States until the adoption of the Community list of enzymes applies.</p> <p>Regulation (EC) No 1333/2008 on food additives:  The regulation strengthens the principle of food safety and consumer information. It allows a more efficient and simplified procedure for authorisation of food additives by Comitology. The consolidation of all food additives legislation in one single legal instrument will make legislation more user-friendly for citizens and business operators.  The regulation, except transitional provisions, will apply by 20 January 2010.</p> <p>Regulation (EC) No 1334/2008 on flavouring:  The Regulation modernises the current legislation taking into account the latest scientific advice.  The regulation will apply on 20 January 2010, however, Regulation (EC) No 2232/96, laying down a Community procedure for flavouring substances, will continue to apply until the date of application of the Community list of flavourings.</p>
<p>Article 4.6 point 30</p>	<p>In production of child nutrition products for babies based on milk, milk mixtures (including dry baby milk mixture), milk drinks (including dry milk drinks) for babies, milk porridge it is allowed to use food additives the list of which is specified in Supplement 17 to these Technical Regulations.</p>	

**4.8. Marking requirements to milk and dairy products**

<p>Article 4.8 point 22 sub-points 13</p>	<p>Manufacturing date and packing date of dairy products (in case they are not the same) indicated in two-digit numbers: hour, date, month (for short-life dairy products with the shelf life counted in hours); date, month, year (for short-life dairy products with the shelf life of up to 30 days); month, year (for non-perishable dairy products including preserves)</p>	<p>EU requests alternative measures to be recognised, based on the safety outcome.</p>
<p>Article 4.8 point 22 sub-points 14</p>	<p>Shelf life indicated in two-digit numbers: hour, date, month (for short-life dairy products with the shelf life counted in hours); date, month, year (for short-life dairy products with the shelf life of up to 30 days); month, year (for non-perishable dairy products including preserves). The shelf life shall be indicated after the words "Valid till", "Use before" or "Best before". The shelf life may be indicated in hours, days, months ("Use within 36 hours", "Use within 14 days", "Use within 6 months", "Valid for 14 days", "Valid for 6 months");</p>	
<p>Article 4.8 point 24</p>	<p>Information on the cheese envelope or cheese coating shall be indicated with the use of indelible safe ink or self-adhesive labels or labels allowed for contact with dairy products in the established order or with the use of other available methods. Cheese, cheese products shall have marks indicating the following additional information: 1) type of main starter population (wording in the marking shall be formulated at the discretion of the manufacturer); 2) nature of origin of milk-clotting enzyme preparations.</p>	<p>EU requests the requirements to indicate names of main starter population / nature of origin of milk-clotting enzyme preparations to be optional.</p>

<p>Article 4.8 point 28</p>	<p>The allowable deviations of nutritive value indices of a milk-processing product indicated in its package or label from the actual nutritive value indices of such product shall not exceed the levels specified in Supplement 18 to these Technical Regulations. The nutritive value indices to be marked for a milk derivative shall be established on the basis of average weighted values obtained through calculating on the basis of known values, or on the basis of average weighted values obtained through researching (testing) of a milk derivative by the manufacturer or through calculating on the basis of table values obtained from official sources or through calculating in analysing the nutritive value indices of used components. In products produced out of whole milk the nutritive value may be indicated in the range "from...to...";</p>	<p><u>Previous EU comments in FL88 Addendum 18:</u> nutritional values The relevant Community legislation is Council Directive 90/496/EEC on nutrition labelling for foodstuffs. The EU has set measures on the derivation of the declared values but the tolerances around the declared value have not yet been harmonized. EU Member States are responsible for setting these tolerances.  Article 6 paragraph (8) of Council Directive 90/496/EEC: "8. The declared values shall, according to the individual case, be average values based on: (a) the manufacturer's analysis of the food; (b) a calculation from the known or actual average values of the ingredients used; (c) a calculation from generally established and accepted data. The rules for implementing the first paragraph with regard in particular to the differences between the declared values and those established in the course of official checks shall be decided upon in accordance with the procedure laid down in Article 10(2).  Could the RF clarify the discrepancy between the provision of article 36(32), which permits fortification levels for fat soluble vitamins at +50%, and for water soluble vitamins at +100% to meet declared nutrient values at end of shelf life, and the addendum 18 which sets out tolerances of between +/-20% and +/-30% for a stated range of vitamins?</p>
<p>Article 5. Conformity assessment of milk and dairy products</p>	<p>All</p>	<p>The EU requests additional information on the products covered and articulation with assessment based on own evidence.</p>
<p>Article 6</p>	<p>Mandatory labelling/markings of all products and containers with "a unified market circulation mark" to certify conformity with the RF requirements.</p>	<p>Article 6. Labelling of Products with a Unified Market CirRFIation Mark EU requests clarification on this new requirement and in what way "the unified market circulation mark" and the "conformity confirmation procedure" operate. Which dairy products have to undergo to be labelled with the mark differ from the GOST certification and GOST mark?</p>

**Remarks:**

The remarks on the Law of 88 remain valid: different approach with the EU regulations, obligations means binding, non-identical microbiological criteria (nature of germs, limits ...). **The EU requests a general possibility for alternative measures to be recognised, based on the safety outcome..**

Comments on the appendix have been included in the comparative table directly. Additional comments are included in the appendix in bold.

Appendix No.1  
to Technical Regulations  
of the Eurasian Economic Community  
Customs Union  
"Milk and Dairy Products"

Allowable Levels of Content of Potentially Hazardous Substances in Raw Milk, Raw Skimmed Milk and Raw Cream

Products	Potentially hazardous substances	Allowable levels, mg/kg(l), not to exceed
Raw milk, raw skimmed milk, raw cream	Toxic elements:	
	Lead	0.1
	Arsenic	0.05
	Cadmium	0.03
	Mercury	0.005
	Mycotoxins:	
	Aflatoxin M1	0.0005
	Antibiotics:	
	Laevomycetin	less than 0.01
	Tetracycline group	less than 0.01
	Streptomycin	less than 0.5
	Penicillin	less than 0.004
	Inhibiting substances	not allowed
	Pesticides	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	0.05 (1.25 for cream in fat equivalent)
	DDT* and its metabolites	0.05 (1.0 for cream in fat equivalent)
	Radionuclides:	
	Caesium-137	100 Bq/l (kg)
	Strontium-90	25 Bq/l (kg)
	Dioxins <***>	0.000003 (in fat equivalent)
Melamine <***>	not allowed <b>(Request for detection limit.)</b>	

\* DDT — dichlorodiphenyltrichloroethane, an insecticide

\*\* shall be subject to control in case governmental or executive bodies officially establish aggravation of ecological situation in connection with extraordinary circumstances of natural and technogenic character leading to entry of dioxins into environment.

\*\*\* shall enter into force since January 1, 2015.

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**Comments on Article 4.1 point 6**

Heavy metals:

-The EU (in harmony with Russian Law) checks raw milk on heavy metals, the new CU regulations require checks on end products.

Antibiotic substances:



The Penicillin MRL should be detailed for the different substances in this group. It should be set at the level of 0,004 mg/kg for Benzylpenicillin, Amoxicillin und Ampicillin ( the CU-limit would be identical with the EU-MRL) and for other members of the Penicillin-group (e.g. Cloxacillin) the EU-MRL (30µg / kg ) could also be considered.

The MRL for Streptomycin is set but there is no MRL set for Neomycin, Dihydrostreptomycin, Gentamycin, Kanamycin. Codex MRL for these substances should be considered.

How are inhibiting substances defined? To be consistent it should exclude the authorised antibiotic substances listed. An internationally recommended test should be identified for this standard.

#### Dioxins:

- The limit for dioxins is new, but clarification is needed. Which dioxins? Are furans and dioxin-like PCBs included? Are the different dioxins weighted according to the WHO TEQ-guidelines?
- Mass of g/ ml in which shall not be allowed (mainly coliforms and staphylococci). Values like 0.01 g are confusing. Does is mean a limit of 100/g?

#### Melamine

EU requests to align with Codex levels for the following:

Melamine Levels: 1 mg / kg in powdered infant formula, and 2.5 mg / kg in foods (Other than infant formula) and animal feeds.).

It is not justified to apply to dairy products to the strictest criteria adopted for baby food.

Appendix 1, says "Not allowed": a value should be set paying attention to the limits of detection of the detection method (should be 1 ppm for finished products) and take into account the possible presence of non-fraudulent melamine like background contamination from the environment (eg pesticides)

For most products melamine is "not allowed". For these products there is no detection limit (except for Appendix No.5). We strongly request for detection limits for all products (in conformity with EU limits).

To clarify why dioxins and melamine are classified as "radionuclides"  
Dioxins and Melamine are classified as "radionuclides"?

Allowable Levels of Content of Microorganisms and Somatic Cells in Raw Milk, Raw Skimmed Milk and Raw Cream

Products	QMAFAnM*, CFU**/cm <sup>3</sup> (g), not to exceed	Mass of product (g, cm <sup>3</sup> ) in which shall not be allowed		Content of somatic cells in 1 cm <sup>3</sup> (g), not to exceed
		CGB*** (coliforms)	Pathogenic, including salmonellae	
Raw milk:				
higher grade	1 x 10 <sup>9</sup>	-	25	4 x 10 <sup>5</sup>
premium grade	5 x 10 <sup>9</sup>	-	25	1 x 10 <sup>6</sup>
second grade	4 x 10 <sup>9</sup>	-	25	1 x 10 <sup>6</sup>
Raw skimmed milk:				
higher grade	1 x 10 <sup>9</sup>	-	25	-
premium grade	5 x 10 <sup>9</sup>	-	25	-
second grade	4 x 10 <sup>9</sup>	-	25	-
Raw cream				
higher grade	5 x 10 <sup>9</sup>	-	25	-
premium grade	4 x 10 <sup>9</sup>	-	25	-

\*QMAFAnM — quantity of mesophilic aerobic and facultative anaerobic microorganisms.

\*\*CFU — colony-forming units.

\*\*\* CGB – Escheria coli group bacteria.

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Comments on Article 4.1 point 7.

**Requirements regarding the criterion "cells" should exclude goat's milk which show specificities compared to cow milk on this factor. The contents of goat milk cells are between 1 and 2 million. This amounts to prohibit the export of goat cheese.**

**-Total viable count and somatic cell count seem to be referred to a single sample. This could lead to implementation problems**

**-When speaking about "pathogenic including salmonellae" it's not clear to which pathogenic microorganism they refer.**

**-Somatic cells, The order of designations "higher grade, premium grade and second grade is confusing. Is "higher grade" better than" premium grade"? First grade is lacking.**

**-Why is there a limit for pathogenic microorganisms, including salmonella? Does it only apply for raw milk consumption? There is no safety issue if the milk is pasteurized.**

1. Identification Indices for Raw Cow Milk and Raw Skimmed Cow Milk

Index name	Parameters	
	Raw milk	Raw skimmed milk
Fat content, mass %	2.8—6.0	less than 0.5
Protein content, mass %	at least 2.8	
Content of dry skimmed substances of milk, mass %	at least 8.0	
Consistency	Homogeneous liquid without sediment or flakes. May not be frozen	
Taste and smell	Pure taste and smell without foreign flavours and odours not inherent to milk. Slight feedy flavour and aroma may be present	
Colour	From white to light-cream	White with a bit bluish tint
Acidity, degrees Terner	16.0—21.0	
Density, kg/m <sup>3</sup> , at least**	1027.0 (at the temperature of 20 °C and fat mass fracture 3.5%)	1030.0 — for higher grade, 1029.0 — for premium and second grades (at the temperature of 20 °C)
Freezing temperature, Celsius degrees (used if falsification suspected), no higher than	minus 0.520 <b>we suggest the wording "not higher than minus 0,512 °C".</b>	-

2. Identification Indices for Raw Milk from Other Types of Livestock in a Batch

Type of livestock	Content of milk ingredients, %*					Density at the temperature of 20 degrees Celsius	Acidity, degrees Turner, not to exceed
	fat	protein	lactose	dry substances in average	mineral substances, at least		
Goat	2.8—5.5	2.8—3.8	4.4—4.6	13.4	0.8	1027—1030	14—20
Sheep	6.2—7.2	5.1—5.7	4.2—6.6	18.5	0.9	1034	25.0
Mare	1.8—1.9	2.1—2.2	5.8—6.4	10.7	0.3	1032	6.5
She-camel	3.0—5.4	3.8—4.0	5.0—5.7	15.0	0.7	1032	17.5
Buffalo cow	7.5—7.7	4.2—4.6	4.2—4.7	17.5	0.8	1029	17.0
She-ass	1.2—1.4	1.7—1.9	6.0—6.2	9.9	0.5	1011	6.0

\*The values of identification indices for milk received from different livestock in individual milking operations may vary in wider ranges.

\*\*Calculation of basic physical properties of milk shall be done according to the following formula:  
 Dry skimmed milk remains =  $0.25 \cdot A + 0.225 \cdot F + 0.5$ , where A — density of lactometer;  
 F — content of fat in raw milk, mass %

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**Comments on Article 4.1 point 8**

Remark:

1. Unclear for which Indices footnote \*\* applies.
2. Indices Cow here not mentioned.

Acidity in terms of degrees Turner is not used , please provide for possible alternatives.

Identification Indices for Raw Cream

Index name	Parameters
Content of fat, mass %, at least	10.0
Acidity, degrees Terner	14.0—19.0
Consistency	Homogeneous Separate fat nubbles may be present
Taste and smell	Pronounced cream, pure, sweetish taste and smell. Slight feedy flavour and odour may be present
Colour	White with cream tint, homogeneous.

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Allowable Levels of Content of Potentially Hazardous Substances in Milk Derivatives

Product group	Potentially hazardous substances	Allowable levels, mg/kg (l, dm <sup>3</sup> ), not to exceed
1	2	3
All milk processing products (for milk protein concentrates, lactulose, milk sugar, casein, caseinates, milk albumen and products based thereon, milk protein hydrolysates — except for antibiotics) (for dairy, dairy component dry and freeze-dried products — in reconstituted product equivalent)	Mycotoxins:	
	Aflatoxin M <sub>1</sub>	0.0005
	Antibiotics:	
	Laevomycesin (chloramphenicol)	less than 0.01
	Tetracycline group	less than 0.01
	Streptomycin	less than 0.5
	Penicillin	less than 0.004
	Drinking milk and drinking cream, buttermilk, whey, milk drink, fluid fermented dairy products (ayran, acidophilus milk, varenets (fermented baked milk), kefir, kumis and kumis product, yoghurt, soured milk, ryazhenka (fermented baked milk), sour cream, dairy component products based thereon, products heat treated after ripening)	Toxic elements:
Lead		0.1
Arsenic		0.05
Cadmium		0.03
Mercury		0.005
Pesticides		
Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)		0.05 (for cream, for sour cream — 1.25 in fat equivalent)
DDT* and its metabolites		0.05 (for cream, for sour cream — 1.0 in fat equivalent)
Radionuclides:		
Caesium-137		100 Bq/l (kg)
Strontium-90		25 Bq/l (kg)
Dioxins <*>		0.000003 (in fat equivalent)
Melamine <***>		not allowed (less than 1.0 mg/kg) <b>(CODEX still in deliberation EU norm is more strict? Can this limit be met?)</b>
Curds, curd mass, cottage cheese, curd snack, curd products, curd cheese, dairy component products on based thereon, milk albumen and product based thereon, paste-like milk protein products, including heat treated after ripening		Toxic elements:
	Lead	0.3
	Arsenic	0.2
	Cadmium	0.1
	Mercury	0.02
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25
	DDT* and its metabolites	1.0
	Radionuclides:	
	Caesium-137	100 Bq/l (kg)
	Strontium-90	25 Bq/l (kg)
	Dioxins <*>	0.000003 (in fat equivalent)
	Melamine <***>	not allowed

		(less than 1.0 mg/kg)	
Milk, cream, buttermilk, whey, dairy component products based thereon, concentrated and condensed products with sugar, sterilized condensed milk, preserved dairy products and preserved dairy component canned products	Toxic elements:		
	Lead	0.3	
	Arsenic	0.15	
	Cadmium	0.1	
	Mercury	0.015	
	Tin	for preserves in precast tin containers - 200	
	Chrome	for preserves in chrome-plated containers - 0.5	
	Pesticides (in fat equivalent):		
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25	
	DDT* and its metabolites	1.0	
	Radionuclides:		
	Caesium-137	300 Bq/l (kg)	
	Strontium-90	100 Bq/l (kg)	
	Dioxins <*>	0.000003 (in fat equivalent)	
	Melamine <***>	not allowed (less than 1.0 mg/kg) <b>(CODEX still in deliberation EU norm is more strict? Can this limit be met?)</b>	
Dairy products, dairy component products — dry, freeze-dried (milk, cream, cultured milk products, drinks, mixtures for ice cream, buttermilk, whey, skimmed milk)	Toxic elements (in reconstituted product equivalent):		
	Lead	0.1	
	Arsenic	0.05	
	Cadmium	0.03	
	Mercury	0.005	
	Pesticides (in fat equivalent):		
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25	
	DDT* and its metabolites	1.0	
	Radionuclides:		
	Caesium-137	500 Bq/kg	
	Strontium-90	200 Bq/kg	
	Dioxins <*>	0.000003 (in fat equivalent)	
	Melamine <***>	not allowed (less than 1.0 mg/kg)	
	Milk protein concentrates, lactulose, milk sugar, casein, caseinates, milk protein hydrolysates	Toxic elements:	
		Lead	0.3
Arsenic		1.0	
Cadmium		0.2	
Mercury		0.03	
Pesticides (in fat equivalent):			
Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)		1.25	
DDT* and its metabolites		1.0	
Radionuclides:			

	Caesium-137	300 Bq/kg
	Strontium-90	80 Bq/kg
	Dioxins <*>	0.000003 (in fat equivalent)
	Melamine <***>	not allowed (less than 1.0 mg/kg)
Cheeses, cheese products: extra-hard, hard, medium-hard, soft, whey-albumen, processed cheeses, dry cheeses, cheese pastes, sauces	Toxic elements	
	Lead	0.5
	Arsenic	0.3
	Cadmium	0.2
	Mercury	0.03
	Benzopyrene	for smoked products and with smoked components – 0.001
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25
	DDT* and its metabolites	1.0
	Radionuclides:	
	Caesium-137	50 Bq/kg
	Strontium-90	100 Bq/kg
	Dioxins <*>	0.000003 (in fat equivalent)
	Melamine <***>	not allowed (less than 1.0 mg/kg)
Butter, butter paste from cow milk, milk fat	Toxic elements	
	Lead	0.1 (for products with cacao – 0.3)
	Arsenic	0.1
	Cadmium	0.03 (for products with cacao – 0.2)
	Mercury	0.03
	Cuprum	for reserved products – 0.4
	Iron	for reserved products – 1.5
	Tin	for sterilized butter in precast tin containers - 200
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25
	DDT* and its metabolites	1.0
	Radionuclides:	
	Caesium-137	200 Bq/kg (for milk fat – 100)
	Strontium-90	60 Bq/kg (for milk fat – 80)
Dioxins <*>	0.000003 (in fat equivalent)	
Vegetable oil and butter spread, vegetable oil and butter rendered mixture	Oxidative spoilage indices:	
	Peroxide number in fat subtracted from product	10 mmol active oxygen/kg fat EN translation FL88 did not mention 'fat' .
	Toxic elements	
	Lead	0.1 (for products with cacao – 0.3)
	Arsenic	0.1



	Cadmium	0.03 (for products with cacao – 0.2)
	Mercury	0.03
	Cuprum	for reserved products – 0.4
	Iron	for reserved products – 1.5
	Nickel	for products with hydrogenated fat – 0.7
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25
	DDT* and its metabolites	1.0
	Radionuclides:	
	Caesium-137	100 Bq/kg
	Strontium-90	80 Bq/kg
	Dioxins <*>	0.000003 (in fat equivalent)
Ice cream of all kinds from milk and on milk basis	Toxic elements:	
	Lead	0.1
	Arsenic	0.05
	Cadmium	0.03
	Mercury	0.005
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25
	DDT* and its metabolites	1.0
	Radionuclides:	
	Caesium-137	100 Bq/kg
	Strontium-90	25 Bq/kg
	Dioxins <*>	0.000003 (in fat equivalent)
	Melamine <***>	not allowed (less than 1.0 mg/kg)
	Starter cultures: fermenting and probiotic microorganisms for manufacture of cultured milk products, cultured butter, cheeses	Toxic elements:
Lead		0.1/1.0
Arsenic		0.05/0.2
Cadmium		0.03/0.2
Mercury		0.005/0.03
Dry nutrient solutions on milk basis for culturing of starter and probiotic populations	Toxic elements:	
	Lead	0.3
	Arsenic	1.0
	Cadmium	0.2
	Mercury	0.03
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma- isomers)	1.25
	DDT* and its metabolites	1.0
	Radionuclides:	
	Caesium-137	160 Bq/kg
Strontium-90	80 Bq/kg	
Enzyme preparations	Toxic elements:	
	Lead	10.0

	Arsenic	3.0
Dairy component products and milk-containing products with the content of non-milk components over 35 per cent	Requirements to allowable levels of content of toxic elements, mycotoxins, antibiotics, pesticides, radionuclides, microbiological safety indices and oxidative spoilage shall be established with account for content and proportion of milk and non-milk components as well as for types and levels of content of potentially hazardous substances therein.	

\* DDT — dichlorodiphenyltrichloroethane, an insecticide

\*\* shall be subject to control in case governmental or executive bodies officially establish aggravation of ecological situation in connection with extraordinary circumstances of natural and technogenic character leading to entry of dioxins into environment.

\*\*\* shall enter into force since January 1, 2015.

Notes. 1. Allowable levels of content of pesticides, antibiotics, sulfanilamides and food additives with antibiotic properties which are not provided herein shall be controlled according to the procedure established by the laws of the Customs Union as regards assurance of quality and safety of food products.

2. When using chemical methods for detection of penicillin, streptomycin and antibiotics of this group, antibiotics of tetracycline group, recalculation of their actual content in grams shall be made according to the activity of the standard.

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Allowable Levels of Content of Microorganisms in Milk Derivatives at the time of Issuance into Circulation

Product, product group	QMAFAnM*, CFU**/cm <sup>3</sup> (g), not to exceed	Mass of product (g, cm <sup>3</sup> ) in which shall not be allowed				Yeast (Y), mold (M), CFU/cm <sup>3</sup> (g), not to exceed
		CGB*** (coliforms)	pathogenic, including salmonellae	staphylococci S. aureus	listeriae L. monocytogenes	
1	2	3	4	5	6	7
1. Drinking milk, drinking cream, milk drink, milk whey, buttermilk, products based thereon, thermally treated, including: drinking milk, milk drink in retail container, including pasteurized	1 x 10 <sup>5</sup>	0.01	25	1	25	-
sterilized, ultrapasteurized (UHT) (with aseptic bottling)	Industrial sterility requirements: 1) after thermostatic heating at a temperature of 37 degrees Celsius during 3-5 days, no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste and consistency; 2) the following changes shall be allowed after thermostatic heating: a) titrable acidity — not to exceed 2 degrees Turner; b) QMAFAnM — not to exceed 10 CFU/cm <sup>3</sup> (g)					
ultrapasteurized (without aseptic bottling)	100	10.0	100	10.0	25	-
rendered Not relevant	2.5 x 10 <sup>3</sup>	0.1	25	-	25	-
enriched with vitamins, macro-, micro-elements, lactulose, prebiotics	In accordance with the requirements established for drinking milk at different processes of thermal treatment					
in cans and tanks	2 x 10 <sup>5</sup>	0.01	25	0.1	25	-
Pasteurized milk whey and buttermilk in retail container	1 x 10 <sup>5</sup>	0.01	25	1.0	25	-
Cream and products based						

thereon, including: in retail container, including:							
pasteurized	$1 \times 10^5$	0.01	25	1.0	25	-	
sterilized	Industrial sterility requirements: 1) after thermostatic heating at a temperature of 37 degrees Celsius during 3-5 days — no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste and consistency; 2) the following changes shall be allowed after thermostatic heating: a) titrable acidity — not to exceed 2 degrees Terner; b) QMAFAnM — not to exceed 10 CFU/cm <sup>3</sup> (g)						
enriched	$1 \times 10^5$	0.01	25	1.0	25	-	
whipped	$1 \times 10^5$	0.1	25	0.1	25	-	
in cans and tanks	$2 \times 10^5$	0.01	25	0.1	25	-	
Drinks, cocktails, jellies, sauces, creams, puddings, mousses, pastes, soufflé, produced on the basis of milk, cream, buttermilk, whey - pasteurized	$1 \times 10^5$	0.1	25	1.0	25	-	
2. Cultured milk products, products based thereon, including with shelf-life of not to exceed 72 hours:							
without components	Lactic-acid microorga- nisms at least $1 \times 10^7$	0.01	25	1.0	-	-	
with components		0.01	25	1.0	-	-	
with shelf-life over 72 hours;							
without components	Lactic-acid microorga- nisms at least $1 \times 10^7$	0.1	25	1.0	-	Y-50*** M-50	
with components		0.01	25	1.0	-	Y-50*** M-50	
enriched with bifidobacteria and other probiotic microorga- nisms	Bifidobacteria and other probiotic microorga- nisms at least $1 \times 10^6$ in total	0.1	25	1.0	-	Y-50*** M-50	
Sour cream,	For sour	0.001	25	1.0	-	For	

products on its basis, including with components	cream – lactic-acid microorganisms at least $1 \times 10^7$	(for sour cream products heat treated after ripening – 0.1)				products with shelf-life over 72 hours – Y-50 M-50
Thermally treated soured milk and dairy component products, including:						
without components	-	1.0	25	1.0	25	Y-50 M-50
with components	-	1.0	25	1.0	25	Y-50 M-50
3. Curds, curd mass, curd products, products based thereon, including:						
curds without components (apart from commercial with the use of ultra-filtration, skimming, cottage cheese), including:						
with shelf-life of not to exceed 72 hours	Lactic-acid microorganisms at least $1 \times 10^6$	0.001	25	0.1	-	-
with shelf-life over 72 hours	-	0.01	25	0.1	-	Y-100 M-50
frozen Not Relevant?	-	0.01	25	0.1	-	Y-100 M-50
Curds produced with the use of ultra-filtration, skimming, including:						
with shelf-life under 72 hours	-	0.01	25	0.1	-	-
with shelf-life over 72 hours	-	0.01	25	0.1	-	Y-50 M-50
frozen	-	0.01	25	0.1	-	Y-50 M-50
Curd products, including:						
with shelf-life	-	0.01	25	0.1	-	-

under 72 hours						
with shelf-life over 72 hours	-	0.01	25	0.1	-	Y-50 M-50
frozen	-	0.01	25	0.1	-	Y-50 M-50
Thermally treated curd products including with components	-	0.1	25	1.0	-	50 in total
4. Milk albumen, products based thereon, except for products produced by way of ripening	$2 \times 10^5$	0.1	25	0.1	-	Y-100 M-50
5. Milk, cream, buttermilk, whey, dairy products, dairy component products based thereon — concentrated and condensed, sterilized, preserved milk products, dairy component products, including:						
milk — condensed, concentrated, sterilized, cream — condensed, sterilized, dairy products and dairy component products — condensed, sterilized	<p>Industrial sterility requirements:</p> <p>1) after thermostatic heating at a temperature of 37 degrees Celsius during 6 days — no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste and consistency;</p> <p>2) after thermostatic heating:</p> <p>a) no change in titrable acidity shall be allowed;</p> <p>b) no cells of microorganisms may be present in microscopic specimen;</p> <p>3) additional requirement to child nutrition products — absence of fungi, yeast and lactic-acid microorganisms when inoculating samples</p>					
milk, cream — condensed, with sugar, in retail container, including:						
without components	$2 \times 10^4$	1.0	25	-	-	-

with components	$2 \times 10^4$	1.0	25	-	-	-
milk, cream – condensed, with sugar, in shipment containers	$4 \times 10^4$	1.0	25	-	-	-
buttermilk, whey – condensed, without sugar and with sugar	$5 \times 10^4$	1.0	25	-	-	-
Dairy component products – condensed, with sugar	$3.5 \times 10^4$	1.0	25	-	-	-
6. Dairy and dairy component products – dry, freeze-dried (milk, cream, cultured milk products, drinks, mixtures for ice cream, whey, buttermilk, skimmed milk), including:						
cow milk – dry, unskimmed	$5 \times 10^4$	0.1	25	1.0	-	-
dry skimmed milk: for direct consumption	$5 \times 10^4$	0.1	25	1.0	-	-
for commercial processing	$1 \times 10^5$	0.1	25	1.0	-	-
dry milk drinks	$1 \times 10^5$	0.01	25	1.0	-	M-50
dry cream and dry cream with sugar	$7 \times 10^4$	0.1	25	1.0	-	-
dry milk whey	$1 \times 10^5$	0.1	25	1.0	-	Y-50 M-100
dry mixtures for ice cream	$5 \times 10^4$	0.1	25	1.0	25 (for soft ice cream)	-
dry cultured milk products	$1 \times 10^5$	0.1	25	1.0	-	Y-50 M-100
buttermilk, whole milk replacer (dry)	$5 \times 10^4$	0.1	25	1.0	-	Y-50 M-100
7. Milk protein concentrates, casein, milk						

sugar, caseinates, milk protein hydrolysates, dry, including:						
edible caseinates	5 x 10 <sup>4</sup> sulfite- reducing clostridia in 0.01 g shall not be allowed	0.1	25	-	-	-
whey protein concentrate	5 x 10 <sup>4</sup>	1.0	25	1.0	-	-
casein concentrate	2.5 x 10 <sup>3</sup>	1.0	25	1.0	-	-
milk protein, caseins	1 x 10 <sup>4</sup> sulfite- reducing clostridia in 0.01 g shall not be allowed	1.0	50	1.0	-	Y-10 M-50
milk refined sugar	1 x 10 <sup>3</sup>	1.0	25	1.0	-	Y-50 M-100
milk edible sugar (edible lactose)	1 x 10 <sup>4</sup>	1.0	25	1.0	-	Y-50 M-100
lactulose concentrate	5 x 10 <sup>3</sup>	1.0	50	1.0	-	Y-50 M-100
8. Cheeses, cheese products: extra-hard, hard, medium-hard, soft, processed, whey- albumen, dry, cheese pastes, sauces, including: cheeses, cheese products (extra-hard, hard, medium-hard, soft, whey- albumen)						
without components	-	0.001	25	0.001	25	-
with components	-	0.001	25	0.001	25	-
smoked	-	0.001	25	0.001	25	-
processed cheeses and cheese products:						
without	5 x 10 <sup>3</sup>	0.1	25	-	-	Y-50



components						M-50
with components	$1 \times 10^4$	0.1	25	-	-	Y-100 M-100
smoked	$1 \times 10^4$	0.1	25	-	-	Y-100 M-100
cheese sauces, pastes	$1 \times 10^4$	0.1	25	-	-	-
dry cheeses and cheese products	$5 \times 10^4$	1.0	25	-	-	-
9. Butter, butter paste from cow milk, milk fat, including: butter from cow milk: cream (sweet cream, cultured cream, salted, non-salted), including:						
without components	$1 \times 10^5$	0.01	25	0.1	25	100 in total
with components	$1 \times 10^5$	0.01	25	0.1	25	Y-100 M-100
sterilized	<p>Industrial sterility requirements:</p> <p>1) after thermostatic heating at a temperature of 37 degrees Celsius during 3-5 days — no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste and consistency;</p> <p>2) the following changes shall be allowed after thermostatic heating:</p> <p>a) change in fat phase acidity not to exceed 0.5 degree Kettstofer;</p> <p>b) change in titrable acidity of milk plasma not to exceed 2 degrees Turner;</p> <p>c) QMAFAnM not to exceed 100 CFU/g</p>					
melted butter	$1 \times 10^3$	1.0	25	-	-	M-200
dry butter	$1 \times 10^5$	0.01	25	0.1	25	100 in total
milk fat	$1 \times 10^3$	1.0	25	-	-	M-200
butter paste, including:						
without components	$2 \times 10^5$	0.01	25	0.1	25	Y-100 M-100
with components	$2 \times 10^5$	0.001	25	0.1	25	Y-100 M-100
10. Vegetable oil and butter spread, vegetable oil and butter rendered mixture, including:						
vegetable oil and butter spread	$1 \times 10^5$	0.01	25	0.1	25	Y-100 M-100
vegetable oil and butter rendered mixture	$1 \times 10^3$	1.0	25	-	-	M-200
11 Ice cream – milk,						

sour-milk, cream ice, plombir, with vegetable fat, cakes and desserts from ice cream, mixtures, glaze for ice cream:						
ice cream – milk, cream-ice, plombir, with vegetable fat – hardened, including with components, cakes and desserts from ice cream	$1 \times 10^5$	0.01	25	1.0	25	-
ice cream – milk, cream ice, plombir, with vegetable fat – soft, including with components	$1 \times 10^5$	0.1	25	1.0	25	-
fluid mixtures for soft ice cream	$3 \times 10^4$	0.01	25	1.0	25	-
sour-milk ice cream	Lactic-acid microorganisms at least $1 \times 10^6$	0.1	25	1.0	25	-
12. Starter cultures (fermenting and probiotic microorganisms for manufacturing of cultured milk products, cultured butter and cheeses), including:	Quantity of lactic-acid and (or) other fermenting microorganisms, CFU/cm <sup>3</sup> (g), at least					
kefir cultures – symbiotic (fluid)	$1 \times 10^8$	3.0	100	10	-	M-5
pure growth cultures, including						
fluid, including frozen	$1 \times 10^8$ For concentrated	10.0	100	10	-	5 in total

	cultures at least $1 \times 10^{10}$					
dry	$1 \times 10^9$ For concentrated cultures at least $1 \times 10^{10}$	1.0	1.0	10	-	5 in total
13. Milk-clotting enzyme preparations, including:						
of animal origin	$1 \times 10^4$	1.0 E.coli in 25	25 sulfite-reducing clostridia in 0.01 g	-	-	-
of plant origin	$5 \times 10^4$	1.0	25	-	-	-
bacteriogenous and mycogenous	$5 \times 10^4$ Must not contain viable forms of enzyme producer	1.0	25	-	-	-
	Must not have antibiotic activity. Mycogenous enzyme preparations must not contain mycotoxins.					
14. Nutrient solutions for culturing of starter and probiotic populations – dry, on milk basis	$5 \times 10^4$	0.01	25 sulfite-reducing clostridia in 0.01 g	-	-	-
15. Milk-containing products	Requirements shall be established with account for content and proportion of milk and non-milk components in the product as specified in regulatory and technical documents.					

\*QMAFAnM — quantity of mesophilic aerobic and facultative anaerobic microorganisms.

\*\*CFU — colony-forming units.

\*\*\* CGB – Escheria coli group bacteria.

\*\*\*\*- presence of yeast as of the end of shelf-life, at least  $1 \times 10^4$  for ayran and kefir, at least  $1 \times 10^5$  for kumys; presence of yeast shall be allowed in products produced with their use in starter cultures.

Notes.1. Hygienic standards concerning microbiological indices of safety and nutrition value of food products shall include the following groups of microorganisms:

1) sanitary indicator microorganisms, which shall comprise quantity of mesophilic aerobic and facultative anaerobic microorganisms (QMAFAnM), coliform bacteria (coliforms), Enterobacteriaceae, enterococci;

2) opportunistic pathogens, which shall comprise E. coli, Staphylococcus aureus, Proteus type bacteria, B. cereus and sulfite-reducing clostridia, Vibrio parahaemolyticus;

3) pathogenic microorganisms, including salmonellae and Listeria monocytogenes, Yersinia type bacteria;

4) spoilage microorganisms — yeast, mold fungi, lactic-acid microorganisms;

5) starter population microorganisms and probiotic microorganisms (lactic-acid microorganisms, propionic-acid microorganisms, yeast, bifidobacteria, acidophilic bacteria etc.) — in products with controlled level of biotechnological microflora and in probiotic products.

2. Standardization of microbiological safety indices of food products shall be done for the majority of microorganism groups.

according to the alternative principle — a mass of product shall be standardized in which shall not be allowed coliform bacteria, the majority of opportunistic pathogens and pathogenic microorganisms, including salmonellae and *Listeria monocytogenes*. In other cases, the standard shall reflect the quantity of colony-forming units in 1 g (ml) of product (CFU/g, ml);

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**For cheese is mentioned a limit of 0.001 in g/ cm<sup>3</sup> of CGB coliforms.**

**Alternative measures using coagulase positive staphylococci as an indicator to trigger the examination staphylococcus enterotoxins should be accepted.**

**Note 1 needs clarification. Under which circumstances do hygienic standards apply for the other microorganisms mentioned in the note, but not present in the table?**

Organoleptical Indicators of Identification of Milk Derivatives

Dairy products	Indicators			
	External appearance	Consistency	Taste and smell	Colour
Drinking milk	Non-transparent liquid	Liquid, homogeneous, non-gummy	Typical for milk with a slight boiling flavour. Sweetish flavour may be present.	White, a bluish tint may be present in skimmed milk, light-cream tint – in sterilized milk; as regards enriched milk – depending on the colour of enriching components used
Drinking cream	Homogeneous non-transparent liquid	Homogeneous, moderately viscous	Typical for cream with a slight flavour of boiling. Sweetish-and-saltish flavour may be present	White with a cream tint, even across the whole mass, light-cream — for sterilized cream

Ryazhenka, varenets	Homogeneous liquid, stirred or non-stirred, without gas generation	Pure sour-milk, with a pronounced pasteurization flavour	Even light-cream; for varenets – from white to light-cream
Acidophilus milk	Homogeneous gummy liquid	Pure sour-milk, slightly spicy flavour	Even milk-white
Kefir	Homogeneous stirred or non-stirred liquid. For products produced with the use of yeast — gas making may be present. If flavouring agents are added — with their presence.	Pure sour-milk and slightly spicy taste or taste and smell conditioned by added components. For products produced with the use of yeast — a yeast flavour may be present.	Even milk-white or conditioned by added components
Yoghurt	Homogeneous, moderately viscous liquid. If stabilizer is added — jelly-like or cream-like. If flavouring agents are added — with their presence.	Sour-milk. If sugar or sweetener is added — moderately sweet taste. If flavouring agents are added — conditioned by added components.	Even milk-white or conditioned by added components
Curds, curd mass, curd products	Soft smudgeable or crumbly with presence of perceptible particles of milk protein or without them. If flavouring agents are added, with their presence.	Pure sour-milk. Dry milk flavour may be present. If sugar or sweetener is added —	Even white or with cream tint or conditioned by added components

			moderately sweet. If flavouring agents are added — conditioned by added components.	
Sour cream	Homogeneous mass with glazed surface		Pure sour-milk. Flavour of melted butter may be present	Even white with cream tint
Ice cream	Portions of one-layer or multi-layer ice cream of different form, wholly or partially coated by glaze (chocolate) or without glaze (chocolate)	Dense. Homogeneous, without perceptible nubbles of fat, stabilizer and emulsifier, particles of protein and lactose, ice crystals. If flavouring agents are added — with their presence. In glazed ice cream, structure of glaze (chocolate) is homogeneous, without perceptible particles of sugar, cacao products, dry milk products, with presence of particles of nuts, waffle crumbs and other components, if used.	Pure, typical for the given type of ice cream	Typical for the given type of ice cream, even across the whole mass of a one-layer ice cream or across the whole mass of each layer of a multi-layer ice cream. For glazed ice cream — colour of coating typical for said type of glaze
Melted butter	Granular or dense, homogeneous, in melted form — transparent, without sediment		Taste and smell of rendered milk fat without foreign flavours and odours	From white yellow to yellow, even
Milk fat	Homogeneous, dense; in melted form — transparent, without sediment		Pure, neutral, typical for milk fat	From white to yellow, even across the whole mass
Butter, butter paste	Dense, homogeneous, plastic; cut surface — shiny, seemingly dry. There may be a bit shiny or slightly mat surface with presence of single small drops of moisture, not sufficiently dense and plastic consistency, a bit crumbly. If flavouring agents are added — with their presence.		For sweet butter and sweet butter paste — pronounced cream taste and flavour of pasteurization, without foreign flavours and odours. For cultured butter and cultured butter paste — pronounced cream taste with sour-milk flavour, without foreign flavours and odours. For whey	From white-yellow to yellow, homogeneous, even. If flavouring agents are added — conditioned by colour of added components

		butter and butter paste — whey flavour may be present. For all types of butter and paste — there may be a slight feedy flavour and (or) insufficiently pronounced flavours: cream, pasteurization, over-pasteurization and melted butter, sour-cream. If flavouring agents are added — conditioned by added components.	
Cheese, cheese product — dry, including processed	Form of package. Consistency — powdery or hard, friable or other. If flavouring agents are added — with their presence	Cheesy, with smell and flavours typical for particular type of cheese. If flavouring agents are added — conditioned by added components	From white to yellow. If flavouring agents are added — conditioned by added components
Cheese, cheese product — super hard	Form — different. Consistency — friable, granular or other. Without pattern or with eyeholes of different form and location. If flavouring agents are added — with their presence.	Cheesy, sweetish-and-spicy with different degree of manifestation, typical for particular type of cheese	From white-yellow to yellow. If flavouring agents are added — conditioned by added components
Cheese, cheese product — hard	Form of a bar, cylinder or other optional form. Consistency — homogeneous, dense, lightly friable or other. Eyeholes — large, average, small or absent. If flavouring agents are added — with their presence.	Cheesy, sweetish-and-spicy, with different degree of manifestation, typical for particular type of cheese. If flavouring agents are added — conditioned by added components	From white-yellow to yellow, even. If flavouring agents are added — conditioned by added components.
Cheese, cheese product — medium-hard	Form of a bar, high or low cylinder, sphere, ellipse or other optional form. Consistency — homogeneous, elastic, plastic. Eyeholes — large, average or small, of different from and location or absent. If flavouring agents are added — with their presence.	For cheeses with high temperature of second heating — cheesy, sweetish, spicy, with different degree of manifestation, typical for particular type of	From white to light-yellow, even, marble or other. For cheeses with mold — streaks of injected mold. For cheeses with surface mold — its presence. If flavouring agents

			cheese; for cheeses with medium and low temperature of second heating — cheesy, sourish, a bit spicy, with different degree of manifestation, typical for particular type of cheese. If mold or smear is used — taste and smell conditioned by the type of mold or smear microflora. If flavouring agents are added — conditioned by added components.	are added — conditioned by added components.
Cheese, cheese product — soft	Form of a low cylinder or other optional form. Consistency — from soft, plastic, slightly elastic to tender, smudgeable, oily. May be a bit friable, crumbly. No pattern. There may be a few eyeholes and pores of irregular form. If flavouring agents are added — with their presence.		Sour-milk or cheesy, typical for particular type of cheese. If mold or smear is used — taste and smell conditioned by the type of mold or smear microflora. If flavouring agents are added — conditioned by added components.	From white to yellow. For cheeses with mold — streaks of injected mold. For cheeses with surface mold — its presence. If flavouring agents are added — conditioned by added components.
Cheese, cheese product — processed, sliced	Form of package. Consistency — from dense, slightly elastic to plastic, homogeneous across the whole mass, preserving the form after slicing. If flavouring agents are added — with their presence		Pure, typical for particular type of cheese. For smoked cheese — with a smoking flavour. If flavouring agents are added — conditioned by added components.	From white to intensive-yellow, even. For smoked cheese — from light-yellow to yellow. For sweet cheeses — from white to brown. If flavouring agents are added — conditioned by added components.
Cheese, cheese product — processed, paste-like.	Form of package. Consistency — from soft, plastic to tender, smudgeable, cream-like, homogeneous across the whole mass. If flavouring agents are added — with their presence.		Pure, typical for particular type of cheese. If flavouring agents are added — conditioned by added components.	From white to intensive-yellow, event. For sweet cheeses — from white to brown. If flavouring agents are added — conditioned by added components.
Dry milk	Homogeneous powder	Fine dry powder	Pure, typical for fresh pasteurized milk	White, with a light-cream tint



Dry cream	Homogeneous powder	Fine dry powder	Pure, typical for fresh pasteurized cream	White, with a light-cream tint
Milk, cream — concentrated	Homogeneous liquid	Homogeneous, moderately viscous liquid	Sweetish-saltish taste typical for baked milk	Light-cream
Milk, cream — condensed, with sugar	Viscous, homogeneous mass	Homogeneous, viscous across the whole mass, no perceptible crystals of milk sugar. There may be a mealy consistency and a narrow sediment of lactose at the bottom of container during storage	Pure, sweet, with pronounced taste of pasteurized milk. For condensed milk with sugar, subjected to additional thermal treatment — caramel flavour. A slight feedy flavour may be present.	White, with cream tint, even. In the case of thermal treatment or production with coffee or cacao — brown
Whey	Transparent or half-transparent liquid	Liquid, homogeneous	Typical for whey, for curd whey — sourish taste, for cheese whey — sweetish or saltish taste	From pale-green to light-yellow
Dry milk whey	Fine powder or powder consisting of single and agglomerated particles of dry whey. There may be some few nubbles crumbling after slight mechanical effect		Typical for milk whey, sweetish, saltish, sourish.	From white to yellow, homogenous across the whole mass
Butter milk	Non-transparent liquid without sediment or flakes	Liquid, homogeneous	Typical for buttermilk; for buttermilk from sweet butter — milk; for buttermilk from cultured butter — sour-milk taste. There may be a flavour of pasteurization or a slight feedy flavour	From white to light-yellow
Casein	Homogeneous powder or crystalline substance	Either powder or dry dense or porous grain of any form	Without flavour, neutral taste	From white to light-cream
Lactulose	Crystalline substance	Small crystals of irregular form	Without smell and sweet taste	White
Lactulose concentrate	Homogeneous viscous liquid	Homogeneous, viscous	Taste from sweetish to sweet-sour. There may be a flavour and smell of caramelisation.	From white-yellow to dark-yellow
Vegetable oil and butter spread	Plastic, homogeneous, dense or soft consistency, surface — mat or a bit shiny, seemingly dry		Taste — cream, sweet-cream or sour-cream	From white to light-yellow, even
Vegetable oil and butter rendered mixture	Granular or homogeneous (dense or soft)		Taste and smell of rendered milk fat	From light-yellow to yellow, even
Dairy component products, milk-containing	In accordance with the description submitted by manufacturer — with taste, colour and (or smell) conditioned by added flavouring agents, use of glaze or other food products.			

products	
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Physico-Chemical and Microbiological Indices of Identification of Milk Derivatives

1. Drinking milk, Cream, Dairy Component Products — Fluid and Structured, Cultured Milk Products, Condensed Milk Products, Dry Milk Products

Name of milk derivative	Indices			
	Ranges of mass fraction, %			Lactic-acid microorganisms, probiotic microorganisms, yeast
	Fat	Protein, at least (for dairy component products – in milk basis)	Dry skimmed milk remains, at least (for dairy component products – in milk basis)	
Drinking milk	0.1 – 8.9	2.8 (for milk with fat content over 4 per cent — 2.6)	8.0	-
Milk drink	0.1 -6.0	2.6	7.4	-
Milk cocktails, drinks, jellies, puddings, mousses, pastes, soufflés	0.1 -9.5	-	-	-
Cream, high-fat cream	10.0 – 34.0	1.8 – 2.6	5.2 – 8.0	-
	35.0 – 58.0	1.2	3.6	-
Cultured milk products, except for ayran and other products produced with addition of water, yoghurt, sour cream, curds; including products with bifidobacteria and other probiotic microorganisms	0.1 – 8.9	2.8 (for product with fat content over 4 per cent – 2.6)	At least 7.8	Lactic-acid microorganisms – at least $1 \times 10^7$ CFU. For products enriched with bifidobacteria and other probiotic microorganisms, including for yoghurt — at least $1 \times 10^6$ CFU of bifidobacteria and (or) other probiotic microorganisms. Yeast, as of the end of shelf-life, at least: for ayran, kefir – $1 \times 10^4$ ; for kumys – $1 \times 10^5$ CFU
Yoghurt	0.1 – 10.0	3.2, with addition of components – 2.8	At least 7.0	
Sour cream, products on its basis	10.0 – 58.0	1.2	3.6	Lactic-acid microorganisms for sour-cream – at least $1 \times 10^7$ CFU
Curds (except for curds produced with the use of ultra-filtration, skimming and except for cottage	0.1 – 35.0	12.0 (for curds with fat content over 18 per cent – 8.0)	13.5 (for curds with fat content over 18 per cent – 10.0)	-

cheese)				
Curds produced with the use of ultra-filtration, skimming	0.1 – 25.0	7.0	10.0	-
Cottage cheese	Not to exceed 25.0	8.0	-	-
Curd mass	At least 0.1	6.0	-	-
Curd products*	0.1 – 35.0	-	-	-
Sterilized condensed milk	0.2 – 16.0	6.0	11.5	-
Condensed milk with sugar	0.2 – 16.0	5.0	12.0	-
Sterilized concentrated milk	7.0 – 9.5	6.0	16.0	-
Sterilized cream	25.0	2.6	5.3	-
Condensed cream with sugar	19.0 – 20.0	6.0	18.0	-
Dry milk	0.1 – 41.0	18.0	54.0	-
Dry cream, including dry high-fat cream	42.0 – 74.0	7.0 – 18.0	21.0 – 55.0	-
	75.0 – 80.0	5.0 <b>EU norm min. 34% on nonfat dry matter</b>	15.0	-
Dry milk whey	Not to exceed 2.0	At least 10.0	At least 95.0	-

\* Identification indices shall be specified in regulatory or technical documents or standards of the organisation.

## 2. Butter and butter paste from cow milk

Name of butter	Mass fracture, %			Titrable acidity of milk plasma of the product, degrees Terner	
	fat	moisture	salt	sweet butter	cultured butter
Melted butter	at least 99.0	not to exceed 1.0	-		
Butter, including:					
sweet butter and cultured butter:				not to exceed 30.0	40.0 – 65.0
non-salted	50.0 – 85.0 incl. <b>CODEX butter min 80% milkfat</b>	14.0 – 46.0	-		
salted	50.0 – 85.0 incl. <b>CODEX butter min 80% milkfat</b>	13.0 – 45.0	1.0		
with components	50.0 – 69.0	16.0 – 45.0	-	-	-
Butter paste — sweet and cultured:				not to exceed 33.0	40.0 – 65.0
non-salted	39.0 – 49.0	56.0 – 47.0	-		
salted	39.0 – 49.0	55.0 – 46.0	1.0		
with components	39.0 – 49.0	40.0 – 55.0	-	-	-
Milk fat	at least 99.8	not to exceed 0.2	-	-	-

## 3. Vegetable Oil and Butter Spread, Vegetable Oil and Butter Rendered Mixture

Name of products	Mass fracture of common fat, %	Mass fracture of milk fat in fat phase, %	Mass fracture of linoleic acid in fat extracted from product, %	Mass fracture of trans-isomers of oleinic acid in fat extracted from product in methyl-elaidate equivalent, %	Fat melting temperature, °C, not to exceed
Vegetable oil and butter spread	39 – 95	At least 50	10.0 – 35.0	8.0	36
Vegetable oil and butter rendered mixture	At least 99	At least 50	10.0 – 35.0	8.0	36

#### 4. Cheese, cheese product

Name of products	Mass fracture, %			
	moisture	moisture in fat-free substance	fat in dry substance	salt
Cheese, cheese product — dry	2.0 – 10.0	less than 15.0	1.0 – 40.0 incl.	2.0 – 6.0
Cheese, cheese product — extra-hard	30.0 – 35.0	less than 51.0	1.0 – 60.0 and more	1.0 – 3.0 incl.
Cheese, cheese product — hard	40.0 – 42.0	49.0 – 56.0 incl.	1.0 – 60.0 and more	0.5 – 2.5 incl.
Cheese, cheese product — medium-hard	36.0 – 55.0	54.0 – 69.0 incl.	1.0 – 60.0 and more	0.5 – 4.0 incl.
Cheese, cheese product – soft	30.0 – 80.0	more than 67.0	1.0 – 60.0 and more	0.4 – 5.0 incl., for pickled cheese — 2.0 – 7.0 incl.

#### 5. Processed cheese, processed cheese product

Name of products	Mass fracture, %			
	fat in dry substance	moisture	common salt (except for sweet cheeses)	sucrose (for sweet cheeses)
Cheese (cheese product) — processed, sliced	up to 65.0 incl.	35.0 – 70.0 incl.	0.2 – 4.0 incl.	up to 30 incl.
Cheese (cheese product) – processed, paste-like	20.0 – 70.0 incl.	35.0 – 70.0 incl.	0.2 – 4.0 incl.	
Cheese (cheese product) – processed, dry	up to 51.0 incl.	3.0 – 7.0 incl.	2.0 – 5.0 incl.	

#### 6. Ice cream

Types	Mass fracture, %		Mass fracture, %, at least		Acidity**, degrees Ternner, not to exceed	Overrun, %
	milk fat	dry skimmed milk remains*	sucrose or total sugar (with deduction of lactose)	dry substances		
Plombir	At least 12.0	7.0 – 10.0	14.0	36	21	40 – 130
Cream ice	8.0 – 11.5	7.0 -11.0	14.0	32	22	40 – 110
Milk	Not to exceed 7.5	7.0 – 11.5	14.5	28	23	40 – 90
Sour-milk	Not to exceed 7.5	7.0 – 11.5	17.0	28	90	40 – 90
With vegetable fat	Not to exceed 12.0*	7.0 – 11.0	14.0	29	22	40 - 110

\* RSMS – residual skim milk solids.

\*\* Mixture of milk and vegetable fat

\*\*\* Acidity of ice cream with flavouring agents shall be established by national standards, technical documents or standards of organisations.

Notes:

1. Identification indices for dairy component products and milk-containing milk derivatives shall be established by national standards, technical documents or standards of organizations;
2. The "mass fracture of dry skimmed milk remains, %" index shall not be a mandatorily standardized and controlled index and shall be established at the discretion of manufacturer.

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Allowable Levels of Oxidative Spoilage and Content of Potentially Hazardous Substances in Baby Milk Products

Product, product group	Potentially hazardous substances and oxidative spoilage indices	Allowable levels, mg/kg (l), not to exceed (for dry products – in reconstituted product equivalent)
All milk products	Antibiotics:	
	Laevomycetin	less than 0.01
	Tetracycline group	less than 0.01
	Penicillin	less than 0.004
	Streptomycin	less than 0.5
	Mycotoxins:	
	Aflatoxin M <sub>1</sub>	not to exceed 0.00002
	Radionuclides (in ready-to-use product equivalent):	
	Caesium-137	40 Bq/l
	Strontium-90	25 Bq/l
	Dioxins <*>	not allowed <b>(Request for detection limit.)</b>
	Melamine <***>	not allowed (less than 1.0 mg/kg)
	Oxidative spoilage index	4.0 mmol of active oxygen/ kg fat (for dry products)
Adapted milk mixtures and follow-up milk mixtures (dry, fluid, fresh and cultured milk), products based on partially hydrolysed proteins, milk — pasteurized, ultra-pasteurized, sterilized (including enriched), cream — sterilized, fluid cultured milk products, including with fruit and (or) vegetable components, dry milk for child nutrition, dry and fluid milk drinks, low-lactose and lactose-free products	Toxic elements:	
	Lead	0.02
	Arsenic	0.05
	Cadmium	0.02
	Mercury	0.005
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.02
DDT* and its metabolites	0.01	
Adapted milk mixtures	Osmolality	320 mOsm/kg
	Acidity	60 degrees Turner for fluid cultured milk products
Follow-up adapted mixtures (formulas)	Osmolality	320 mOsm/kg
	Acidity	60 degrees Turner for fluid cultured milk products
Follow-up partially adapted mixtures (formulas)	Osmolality	330 mOsm/kg
	Acidity	60 degrees Turner for fluid cultured milk products
Dry milk porridges requiring cooking and dry milk instant porridges	Toxic elements (in dry product):	
	Lead	0.3
	Arsenic	0.2
	Cadmium	0.06
	Mercury	0.03
	Mycotoxins (in dry product):	
	Ochratoxin A	0.0005
Aflatoxin B <sub>1</sub>	0.00015	



	Deoxynivalenol	0.05 (for porridges containing wheat, maize or barley flour or grits)
	Zearalenone	0.005 (for porridges containing wheat, maize, barley flour or grits)
	Fumonisin B1 and B2	0.2 mg/kg (for porridges maize flour or grits)
	T-2 toxin	0.05
	Pesticides (in dry product fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.001
	DDT and its metabolites	0.001
	Benzopyrene	less than 0.2 mg/kg
	Pollution and contamination with cereal pests	not allowed
	Metallic impurities (in dry product)	$3 \times 10^{-4}$ %, size of individual particles must not exceed 0.3 mm in maximum linear measurement
Milk porridges — ready-to-use, sterilized, milk porridges — ready, manufactured in infant feeding centres	Toxic elements (in ready product):	
	Lead	0.02
	Arsenic	0.05
	Cadmium	0.02
	Mercury	0.005
	Mycotoxins (in dry product):	
	Ochratoxin A	0.0005
	Aflatoxin B <sub>1</sub>	0.00015
	Deoxynivalenol	0.05 (for porridges containing wheat, maize or barley flour or grits)
	Zearalenone	0.005 (for porridges containing wheat, maize or barley flour or grits)
	Fumonisin B1 and B2	0.2 mg/kg (for porridges maize flour or grits)
	T-2 toxin	0.05
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.01
	DDT and its metabolites	0.001
	Benzopyrene	less than 0.2 mg/kg
	Pollution and contamination with cereal pests	not allowed
	Metallic impurities (in dry product)	$3 \times 10^{-4}$ %, size of individual particles must not exceed 0.3 mm in maximum linear measurement
	Curds and products based thereon, including with fruit and (or) vegetable components	Oxidative spoilage index
Acidity		150 degrees Turner
	Toxic elements:	
	Lead	0.06
	Arsenic	0.15
	Cadmium	0.06
	Mercury	0.015
	Pesticides (in fat equivalent):	

	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.55
	DDT and its metabolites	0.33

\* DDT — dichlorodiphenyltrichloroethane, an insecticide

\*\* shall be subject to control in case governmental or executive bodies officially establish aggravation of ecological situation in connection with extraordinary circumstances of natural and technogenic character leading to entry of dioxins into environment.

\*\*\* shall enter into force since January 1, 2015.

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**Dioxins: "not allowed" (natural) background values should be taken in consideration. ". We request for detection limits.**

**Dioxins and Melamine: A zero-tolerance policy without indicating a detection limit is not acceptable from a scientific point of view.**

Allowable Levels of Content of Microorganisms in Milk-Based Child Nutrition Products, Milk Mixtures  
(Including Dry Milk Mixtures), Milk Drinks (Including Dry Milk Drinks), Milk Porridges for Babies, Including in  
Products Produced in Infant Feeding Centres\*

Product, product group	QMAFAnM, CFU/cm <sup>3</sup> (g), not to exceed	Mass of product (g, cm <sup>3</sup> ) in which shall not be allowed				B. cereus, CFU/cm <sup>3</sup> (g), not to exceed	Yeast (Y), mold (M), CFU/cm <sup>3</sup> (g), not to exceed
		coliform bacteria (coliforms)	escherichia E. coli*	pathogenic, including salmonellae and listeria L. monocytogenes*	staphylococcus S. aureus		
1	2	3	4	5	6	7	8
Adapted milk mixtures, including: dry instant milk mixtures	2 x 10 <sup>3</sup> – for mixtures reconstituted at the temperature of 37 – 50 degrees Celsius, 3 x 10 <sup>3</sup> – for mixtures reconstituted at the temperature of 70 -85 degrees Celsius. In cultured milk mixtures: acidophilic microorganisms – at least 1 x 10 <sup>7</sup> (if used in production), bifidobacteria – at least 1 x 10 <sup>6</sup> (if used in production), lactic-acid microorganisms – at least 1 x 10 <sup>7</sup> (if added after drying), lactic-acid microorganisms – at least 1 x 10 <sup>2</sup> (if not added after drying)	1.0	10	100	10	100	Y-10 M-50
fluid milk mixtures produced with ultra-pasteurization and with aseptic bottling.	Industrial sterility requirements: 1) after thermostatic heating at a temperature of 37 degrees Celsius during 3 – 5 days — no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste or consistency, no bacteria cells in microscopic specimen; 2) the following changes shall be allowed after thermostatic heating: a) change of titrable acidity not to exceed 2 degrees Ternner; b) QMAFAnM — not to exceed 10 CFU/cm <sup>3</sup> (g)						
Fluid cultured milk mixtures with	Lactic-acid microorganisms – at least 1 x 10 <sup>7</sup> ,	3.0	10	50	10	-	Y-10 M-10

aseptic bottling, including with the use of acidophilic microorganisms or bifidobacteria	acidophilic microorganisms – at least $1 \times 10^7$ (if used in production), bifidobacteria – at least $1 \times 10^5$ (if used in production)						
Partially adapted milk mixtures, including:							
instant mixtures	$2 \times 10^3$ – for mixtures reconstituted at the temperature of 37 – 50 degrees Celsius, $3 \times 10^3$ – for mixtures reconstituted at the temperature of 70 – 85 degrees Celsius	1.0	10	100	10	100	Y-10 M-50
mixtures requiring thermal processing	$2.5 \times 10^4$	1.0	-	50	1.0	200	Y-50, M-100
milk mixtures — adapted, sterilized, produced in infant feeding centres	$1 \times 10^2$	10.0	10.0	100.0	10.0	-	-
Milk and cream — sterilized, ultra-pasteurized, with aseptic bottling, including enriched milk	<p>Industrial sterility requirements:</p> <p>1) after thermostatic heating at a temperature of 37 degrees Celsius during 3 – 5 days — no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste and consistency;</p> <p>2) the following changes shall be allowed after thermostatic heating:</p> <p>a) change in titrable acidity not to exceed 2 degrees Turner;</p> <p>b) QMAFAnM – not to exceed 10 CFU/cm<sup>3</sup> (g);</p> <p>3) microscopic specimen — no cells of microorganisms.</p>						
Milk, cream — sterilized, produced in infant-feeding centres, without aseptic bottling	$1 \times 10^2$	10.0	10.0	100.0	10.0	-	-
Fluid cultured milk products, including with the use of acidophilic microorga-	Lactic-acid microorganisms — at least $1 \times 10^7$ , acidophilic microorganisms — at least $1 \times 10^7$ (if used in	3.0	10.0	50.0	10.0	-	Y-10 M-10, for kefir — yeast $1 \times 10^4$

nisms or bifidobacteria	production), bifidobacteria — at least $1 \times 10^6$ (if used in production)						
Cultured milk products produced in infant feeding centres, with non-aseptic bottling	Acidophilic microorganisms, if used in production — at least $1 \times 10^7$ , bifidobacteria, if used in production — at least $1 \times 10^6$	3.0	10.0	50.0	10.0	-	-
Curds, curd products	Microflora typical for curd culture, no cells of foreign microflora	0.3	1.0	50	1.0	-	Y-10. M-10
Curds, curd products, acidophilic paste, low-lactose protein paste — produced in infant feeding centres	Microflora typical for curd culture, no cells of foreign microflora	0.3	-	50	1.0	-	
High-calcium curds produced in infant feeding centres	100	1.0	-	50	1.0	-	
Dry milk for child nutrition, including:							
instant milk	$2 \times 10^3$ — for mixtures reconstituted at the temperature of 37-50 degrees Celsius, $3 \times 10^3$ — for mixtures reconstituted at the temperature of 70-85 degrees Celsius	1.0	10	100	10	100	Y-10 M-50
Milk requiring thermal processing	$2.5 \times 10^4$	1.0	-	50	1.0	200	Y-50 M-100
Pasteurized milk, including with shelf-life over 72 hours	$1.5 \times 10^4$	0.1	1.0	50	1.0	25	-
Dry and fluid milk drinks for babies							

from 6 months to 3 years, including:							
fluid drinks	$1.5 \times 10^4$	0.1	1.0	50	1.0	-	Y-50, M-50
follow-up mixtures, including instant ones	$2 \times 10^3$ – for mixtures reconstituted at 37 – 50 degrees Celsius, $3 \times 10^3$ – for mixtures reconstituted at 70 – 85 degrees Celsius	1.0	10	100	10	100	Y-10, M-50
follow-up mixtures requiring thermal processing after reconstitution	$2.5 \times 10^4$	1.0	-	50	1.0	-	Y-50 M-100
Dry milk porridges, including:							
instant	$1 \times 10^4$	1.0	-	50	1.0	$2 \times 10^2$	Y-50 M-100
requiring cooking	$5 \times 10^4$	0.1	-	50	-	-	Y-100 M-200
Milk porridges – ready-to-use, sterilized	Industrial sterility requirements: 1) after thermostatic heating at a temperature of 37 degrees Celsius during 3-5 days — no visible defects or signs of spoilage (swollen packs, change in appearance and so on), no change in taste and consistency; 2) the following changes shall be allowed after thermostatic heating: a) titrable acidity — not to exceed 2 degrees Ternner; b) QMAFAnM — not to exceed $10 \text{ CFU/cm}^3$ (g)						
Milk porridges — ready-to-use, produced in infant feeding centres	$1 \times 10^3$	1.0	-	50	1.0	-	-
Low-lactose and lactose-free products	$2.5 \times 10^4$	1.0	-	100	1.0	200	Y-50 M-100
Dry milk high protein products	$2.5 \times 10^4$	0.3	-	50	1.0	-	Y-50 M-100
Dry products on milk basis	-	0.3	-	50	1.0	-	Y-50 M-100
Dry milk for child nutrition	$2.5 \times 10^4$	1.0		25	1.0	-	Y-50 M-100

\* As regards control of *E. coli* and pathogenic microorganisms, including salmonellas — if Enterobacteriae, which do not relate to *E. coli* and salmonellas, are detected in standardised masses of product entered into the diet of babies aged 0 to 4 months, — absence of *E. sakazakii* pathogenic microorganism in 300 g. of product shall be controlled.

Note. As regards production of dry baby products on milk basis (mixtures, drinks, dry milk) — if staphylococci are detected in standardised product mass — absence of staphylococcal enterotoxins shall be controlled (not allowed in five samples 25 g each);

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***E. sakazakii*** the EU has only the special *E. sakazakii* criteria for “Dried infant formulae and dried dietary foods for special medical purposes intended for infants below 6 months of age” where the CU has a *E. sakazakii* criteria also for “children aged over 6 months” and more. We request an alignment with the EU standard.

Allowable Levels of Oxidative Spoilage and Content of Potentially Hazardous Substances in Dairy, Dairy Component Products for Pre-School and School Age Children

Product, product group	Potentially hazardous substances and oxidative spoilage indices	Allowable levels, mg/kg (l), not to exceed (for dry products — in reconstituted product equivalent)
1	2	3
All milk products	Antibiotics:	
	Laevomycesin	less than 0.01
	Tetracycline group	less than 0.01
	Penicillin	less than 0.004
	Streptomycin	less than 0.5
	Mycotoxins:	
	Aflatoxin M <sub>1</sub>	0.00002 for cheeses — 0.00005
	Radionuclides	
	Caesium-137	40 Bq/l (kg)
	Strontium-90	25 Bq/l (kg)
	Dioxins <*>	not allowed <b>(Request for detection limit.)</b>
	Melamine <***>	not allowed (less than 1.0 mg/kg)
Milk — sterilized, ultra-pasteurized, including vitaminized, milk — pasteurized, cream — sterilized, fluid cultured milk products, including enriched ones, sour cream, dry milk for child nutrition, dry and fluid milk drinks, low-lactose and lactose-free products, milk and cream — condensed, with sugar, milk and cream — concentrated	Oxidative spoilage index	4 mmol of active oxygen/kg fat for products with fat content over 5 g/100 g and products enriched with vegetable oils
	Toxic elements:	
	Lead	0.02
	Arsenic	0.05
	Cadmium	0.02
	Mercury	0.005
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.02
	DDT* and its metabolites	0.01
	Curds and products based thereon, including with fruit and (or) vegetable components and (or) heat treated after ripening	Oxidative spoilage index
Acidity		150 degrees Terner
Toxic elements:		
Lead		0.06
Arsenic		0.15
Cadmium		0.06
Mercury		0.015
Pesticides (in fat equivalent):		
Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)		0.55
DDT* and its metabolites		0.33
Butter, butter paste — higher grade	Fat phase acidity	2.5 degrees Kettstoffer (for butter and paste with components —



		3.5 degrees Kettstofer)
	Toxic elements:	
	Lead	0.1
	Arsenic	0.1
	Cadmium	0.03
	Mercury	0.03
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.2
	DDT* and its metabolites	0.2
Cheeses, cheese products (hard, medium-hard, soft, pickled), processed cheese, cheese pastes	Toxic elements:	
	Lead	0.2
	Arsenic	0.15
	Cadmium	0.1
	Mercury	0.03
	Pesticides (in fat equivalent):	
	Hexachlorocyclohexane (alpha-, beta-, gamma-isomers)	0.6
	DDT* and its metabolites	0.2
Components of non-dairy origin	Must conform to Customs Union food quality and safety legislation	

\* DDT — dichlorodiphenyltrichloroethane, an insecticide

\*\* shall be subject to control in case governmental or executive bodies officially establish aggravation of ecological situation in connection with extraordinary circumstances of natural and technogenic character leading to entry of dioxins into environment.

\*\*\* shall enter into force since January 1, 2015.

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**Dioxins and Melamine: A zero-tolerance policy without indicating a detection limit is not acceptable from a scientific point of view.**

-Unclear parameters on Appendix No.12-16

-The following criteria unclear: ° Terner (Acidity), Osmoladlity, Millimole of active oxygen/kg of fat (Peroxide value) and what is meant by <0.2 mkg/kg (Benzapyrene)?

-The CU uses criteria for CGB (coliforms), EU uses the new method of testing on enterotoxins.

-S. aureus is not a common parameter for testing in the EU. Random checks on S. aureus are made. The CU works in the SPS- requirements chap II sec. 1 with more than a dozen of different S. aureus standards, these should be harmonized. (Some of them might be too strict.)

Appendix No.12  
to Technical Regulations  
of the Eurasian Economic Community  
Customs Union  
"Milk and Dairy Products"

Allowable Levels of Content of Microorganisms in Dairy and Dairy Component Products for Pre-School and School Age Children

Index, product group	QMAFAnM*, CFU**/cm <sup>3</sup> (g), not to exceed	Mass of product (g, cm <sup>3</sup> ) in which shall not be allowed				Yeast (Y), mold (M), CFU/cm <sup>3</sup> (g), not to exceed
		coliform bacteria (coliforms)	pathogenic, including salmonellae	staphylococci S. aureus	listeriae L. monocytogenes	
Milk — pasteurized, in retail container	1 x 10 <sup>9</sup>	0.01	25	1.0	25	-
Milk — ultra-pasteurized, without aseptic bottling, in retail container	100	10.0	100	10.0	25	-
Cream — pasteurized, in retail container	1 x 10 <sup>9</sup>	0.01	25	1.0	25	-
Cream — ultra-pasteurized, without aseptic bottling, in retail container	100	10.0	100	10.0	25	-
Rendered milk	2.5 x 10 <sup>9</sup>	1.0	25	-	-	-
Milk and cream — sterilized, ultra-pasteurized, with aseptic bottling, including enriched	Must conform to industrial sterility requirements for milk and cream — sterilized, ultra-pasteurized, in retail container					
Cultured milk products, including yoghurt, with shelf-life of up to 72 hours	-	0.01	25	1.0	-	-
Cultured milk products, including yoghurt, with shelf-life over 72 hours	Lactic-acid microorganisms — at least 1 x 10 <sup>7</sup> , for products subjected to thermal	0.1	25	1.0	-	Y-50, M-50, except for products produced with the use of

	treatment — not to be standardized					cultures containing yeast
Cultured milk products enriched with bifidobacteria with shelf-life over 72 hours	Lactic-acid microorganisms — at least $1 \times 10^7$ ; bifidobacteria — at least $1 \times 10^6$	0.1	25	1.0	-	Y-50 M-50, except for products produced with the use of cultures containing yeast
Ryazhenka Not Relevant?	Lactic-acid microorganisms — at least $1 \times 10^7$	1.0	25	1.0	-	Y-50 M-50 (standardized for products with shelf-life over 72 hours)
Sour cream and products based thereon	For sour cream: lactic-acid microorganisms — at least $1 \times 10^7$	0.001 (for sour cream products heat treated after ripening — 0.1)	25	1.0	-	Y-50 M-50 for products with shelf-life over 72 hours
Butter, butter paste, curds and products based thereon, cheeses, milk preserves	In accordance with levels established by Appendix 4 hereto					
Products used in production of children's products:						
dry milk with fat content over 25 per cent, dry skimmed milk	$2.5 \times 10^4$	1.0	25	1.0	-	Y-50 M-100
Milk whey protein concentrate obtained through electrodialysis (ultra-filtration and electrodialysis)	$1 \times 10^4$	1.0	25	1.0	-	Y-10 M-50
carbohydrate-protein concentrate	$1 \times 10^4$	1.0	50	1.0	-	Y-10 M-50
milk protein concentrate	$1 \times 10^4$	1.0	50	1.0	-	Y-10 M-50
dry carbohydrate-protein module from	$2.5 \times 10^4$	1.0	25	1.0	-	Y-10 M-50

cheese whey						
dry carbohydrate protein modules from curd whey	$2.5 \times 10^4$	1.0	25	1.0	-	Y-10 M-50
fluid paracasein concentrate	-	3.0	25	1.0	-	Y-50 M-50
dry paracasein concentrate	-	1.0	25	1.0	-	Y-50 M-50
dry caseocyte	$1 \times 10^4$	1.0	25	1.0	-	Y-10 M-50
non-fat dry milk component for dry children's food products	$1.5 \times 10^4$	0.3	25	1.0	-	Y-10 M-50
dry milk component with malt extract (for fluid children's food products)	$1.5 \times 10^4$	1.0	25	1.0	-	Y-10 M-50
dry milk component with carbohydrate-protein concentrate (for fluid children's food products)	$2.5 \times 10^4$	1.0	25	1.0	-	Y-50 M-50
non-fat dry milk component with no chemical processing (for dry children's food products)	$2.5 \times 10^4$	1.0	25	1.0	-	Y-50 M-50
refined milk sugar	$1 \times 10^3$	1.0	25	-	-	M-10
edible lactose	$1 \times 10^4$	1.0	25	1.0	-	M-100
lactose concentrate	$1 \times 10^3$	1.0	50	-	-	M-100
lactulose concentrate	$1 \times 10^3$	1.0	50	1.0	-	Y-50 M-100
dry milk whey	$1 \times 10^4$	1.0	25	1.0	-	Y-10 M-50

\*QMAFAnM — quantity of mesophilic aerobic and facultative anaerobic microorganisms.

\*\*CFU — colony-forming units

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**Physico-Chemical Identification Indices of Milk-Based Baby Food Products, Milk Mixtures (Including Dry Milk Mixtures), Milk Drinks (Including Dry Milk Drinks), Milk Porridges for Babies**

**1. Adapted Milk Mixtures (Dry, Fluid, Fresh and Fermented) and Products Based on Partially or Wholly Hydrolysed Proteins for Babies from Birth to Six Months  
(per 100 ml of ready-to-use product)**

Criteria and parameters	Units of measurement	Allowable levels	
		controlled	labelled
Protein	g	1.2 – 1.7 <b>Protein for cow's milk that is not partial hydrolysate EU is 0.45-0.7 g/100kJ which is equivalent to 1.1 to 2.1 g per 100 ml</b>	+
Milk whey proteins	percentage of total protein, at least	50* <b>There is no minimum specification for whey protein.</b>	+
Fat	g	3.0 – 4.0	+
Linoleic acid	percentage of total fatty acids	14 – 20 <b>Linoleic acid is not expressed as a percentage in EU legislation.</b>	+
	mg	400 – 800 <b>Linoleic acid in EU 70 to 285 mg / 100 kJ equivalent to 175 to 841 mg per 100ml.</b>	
Alpha-tocopherol/polyunsaturated fatty acids ratio	-	1-2	
Carbohydrates	g	6.5 – 8.0 <b>Carbohydrates in EU 2.2 to 3.4 g /100 kJ. Equivalent to 5.5 to 10.0</b>	+
Lactose	Percentage of total carbohydrates**, at least	65 <b>In EU requirement is for 50% of carbohydrate to be lactose. This rule does not apply to IF with more than 50% of protein from soya.</b>	+
Taurine	mg, not to exceed	8.0 <b>Voluntary addition permitted. If added maximum level is 2.9mg/100kJ. Equivalent to 8.6</b>	+

\* Except for adapted casein-dominating mixtures (milk mixtures with casein content over 50 per cent of total protein content).

\*\* Except for products based on partially or wholly hydrolysed proteins

2. Follow-up Adapted Milk Mixtures (Dry, Fluid, Fresh and Fermented) and Products Based on Partially or Wholly Hydrolysed Protein for Babies over the Age of Six Months (per 100 ml of ready-to-use product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Protein	g	1.2 – 2.1 Protein for cow's milk that is not partial hydrolysate EU is 0.45-0.8g/100kJ which is equivalent to 1.1 to 2.4 g per 100 ml.	+
Milk whey proteins	percentage of total protein, at least	35* There is no minimum specification for whey protein	+
Fat	g	2.5 – 4.0 Fat is 0.96 to 1.4 g per 100 kJ which is roughly equivalent to 2.4 to 4.1 g per 100ml.	+
Linoleic acid	percentage of total fatty acids	14 – 20 Linoleic acid is not expressed as a percentage in EU legislation	+
	mg	400 – 800 Linoleic acid in EU 70 to 285 mg / 100 kJ equivalent to 175 to 841 mg per 100ml.	
Carbohydrates	g	7.0 – 9.0 Carbohydrates in EU 2.2 to 3.4 g /100 kJ. Equivalent to 5.5 to 10.0.	+
Lactose	Percentage of total carbohydrates**, at least	50 In EU requirement is for 50% of carbohydrate to be lactose. This rule does not apply to IF with more than 50% of protein from soya.	+

\* Except for adapted casein-dominating mixtures (milk mixtures with casein content over 65 per cent of total protein content).

\*\* Except for products based on partially or wholly hydrolysed proteins

3. Adapted Milk Mixtures (Dry, Fluid, Fresh and Fermented) and Products Based on Partially or Wholly Hydrolysed Protein for Babies from Birth to 12 Months

Nutrition Value Indices  
(per 100 ml of ready-to-use product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Protein	g	1.2 – 2.1	+
Milk whey proteins	percentage of total protein, at least	50*	
Taurine	mg, not to exceed	8.0	
Fat	g	3.0 – 4.0	+
Linoleic acid	percentage of total fatty acids	14 - 20	
	mg	400 - 800	
Alpha-tocopherol/polyunsaturated fatty acids ratio	-	1.0 – 2.0	
Carbohydrates	g	6.5 – 8.0	+
Lactose	Percentage of total carbohydrates**, at least	65	+

\* Except for adapted casein-dominating mixtures (milk mixtures with casein content over 50 per cent of total protein content).

\*\* Except for products based on partially or wholly hydrolysed proteins

4. Follow-up Partially Adapted Milk Mixtures (Dry, Fluid, Fresh, Fermented) for Babies over the Age of Six Months

Nutrition Value Indices  
(per 100 ml of ready-to-use product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Protein	g	1.5 – 2.4	+
Milk whey proteins	percentage of total protein, at least	20	
Fat	g	2.5 – 4.0	+
Linoleic acid	percentage of total fatty acids, at least	14	+
	mg, at least	400	
Carbohydrates	g	6.0 – 9.0	+
Lactose	Percentage of total carbohydrates, at least	50	+

Notes.

1. The composition of adapted milk mixture proteins must approximate as closely as possible the composition of women's milk proteins.

2. Sesame oil and cottonseed oil must not be used in adapted milk mixture fat.

3. Trans-isomer content must not exceed 3 per cent of total fat content.

4. Myristic and lauric acid content must not exceed 20 per cent of total fat content.

5. The linoleic acid to alpha-linoleic acid ratio must be at least 5 and must not exceed 15.

6. The content of long chain fatty acids used to enrich formulas must not exceed 1 per cent of total fat for w-3 long chain polyunsaturated fatty acids and 2 per cent for w-6 long chain polyunsaturated fatty acids.

7. Eicosapentaenoic acid content must not exceed docosahexaenoic acid content.

8. Maltodextrin and partially hydrolysed gluten-free starch may be used in addition to lactose; sucrose and fructose — only in initial and follow-up mixtures based on partially hydrolysed proteins and in follow-up partially adapted mixtures; sucrose and (or) fructose content or their total must not exceed 20 per cent of total carbohydrate content; glucose and glucose syrup — only in initial and follow-up mixtures based on partially hydrolysed proteins in quantity not exceeding 14 g/l; carbohydrate component may include prebiotics — galacto-oligosaccharides and fructo-oligosaccharides (in the amount not exceeding 0.8 per cent of product mass) and lactulose.

**Previous EU comments in FL88**

-In EU there is a profile for amino acids which is based on human breast milk composition.

-In EU not permitted to add fructose to infant formulae Sucrose can only be added to particla protein hydrolysates and level is limited to 20% of total carbohydrate content.

Follow-on formulae the carbohydrate must be gluten free but no restriction on levels of addition within that allowed by requirement on use of lactose.

-For follow-on formula the sources of carbohydrates must be gulen-free. In the cas eof infant formulae the following sources of carhohdrates are permitted: lactose, maltose, sucrose, glucose, malto-devtrins, gkluose syrup or dried glucose syrup, naturally gluten free precooked starch or gelatinised starch.

5. Special-Purpose Products for Infant Nutritional Therapy  
(per 100 ml of ready-to-eat product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Low-lactose and lactose-free products			
<b>No specific EU rules on low lactose and lactose-free products.</b>			
Protein	g	1.2 – 2.1	+
Taurine	mg, not to exceed	8.0	
L-carnitine	mg, not to exceed	2.0 (when added)	
Fat	g	3.0 – 4.0	+
Linoleic acid	Per cent of total fatty acids	14 - 20	
	mg	400 – 800	
Carbohydrates	g	6.5 – 8.0	+
Lactose	g, not to exceed	1.0	in low-lactose products
	g, not to exceed	0.01	in lactose-free products

**Previous EU comments in FL88**

In EU products for special medical purposes intended for infants under 1 year of age should comply with the requirements on infant formulae or follow-on formulae adapted as necessary to fulfil their particular nutritional requirements.



6. Supplemental Feeding Products for Babies  
(per 100 ml or 100 g of ready-to-use product)

**EU does not have specific regulations on supplemental feeding products for babies.**

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
<b>Milk — pasteurized, sterilized, ultra-pasteurized drinking, including enriched; cream — sterilized, drinking</b>			
Protein:		<b>It looks like the text is defaulted FL88= 2.8-3.2</b>	+
milk	g	2.8 – 3.2	
cream	g, not to exceed	2.6	
<b>Fat:</b>			
		<b>It looks like the text is defaulted FL88= 2.0-4.0</b>	+
milk	g	2.0 – 4.0	
cream	g	10.0	
ash	g	0.6 – 0.8	
<b>Mineral substances</b>			
Calcium in milk	mg, at least	100	
<b>Cultured milk products, including with fruit and (or) vegetable components</b>			
Protein:	g	2.0 – 3.2, not to exceed 4.0 — for prophylactic feeding	+
Fat	g	2.0 – 4.0	+
Carbohydrates, including sucrose*	g, not to exceed g, not to exceed	12 10	+
Ash	g	0.5 – 0.8	
Calcium	mg, at least	60	
Acidity	degrees Ternner, not to exceed	110	
<b>Curds and products based thereon, paste-like milk products, including with fruit and (or) vegetable components</b>			
Protein	g	7 – 17	+
Fat	g	3 – 10	+
Carbohydrates, including sucrose*	g, not to exceed g, not to exceed	12 10	+
<b>Mineral substances</b>			
Calcium	mg, at least	85	
Acidity	degrees Ternner, not to exceed	150	
<b>Dry milk (per 100 ml of reconstituted product)</b>			
Milk protein	g	2.8 – 3.2	+
Fat	g	2.0 – 4.0	+
<b>Mineral substances</b>			
Calcium	mg, at least	100	
<b>Dry (per 100 ml of reconstituted product) and fluid dairy, dairy component and milk-containing drinks (for children over the age of 6 months)</b>			
Protein	g, at least	1,8	+
Fat	g	1.0 – 4.0	+
Carbohydrates, including sucrose**	g, not to exceed g, not to exceed	12.0 6.0	
<b>Mineral substances</b>			
Calcium	mg	90 – 240	
<b>Dry milk-based porridges — requiring cooking and instant (per 100 g of dry product)</b>			
Moisture	g, not to exceed	8	+
Protein	g	12 – 20	+
	g, at least – in porridges that need to be reconstituted by with whole or partially diluted	7.0	

	cow's milk		
Fat	g	10 – 18	+
	g, at least – in porridges of whole milk whose mass fraction is less than 25 per cent, provided butter or vegetable oil is added to the reconstituted porridge	5.0	
	g, at least – in porridges on skimmed milk, provided they are reconstituted with whole milk or that butter or vegetable oil is added to the reconstituted porridge	0.5	
Carbohydrates, including sucrose**	g g, not to exceed	60 – 70 20	+

\* Substitution of fructose for sucrose shall be allowed in quantity of no more than 5 grams.

\*\* Substitution of fructose for sucrose shall be allowed in quantity of no more than 3 grams.

\*\*\* Substitution of fructose for sucrose shall be allowed in quantity of no more than 10 grams.

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Physico-Chemical Identification Indices of Children's Milk-Based Food Products for Pre-School and School Age Children

**There is no harmonised rule at EU level for such products, however, EU Member States have specific rules.**

1. Drinking Milk, Drinking Cream, Cultured Milk Products\*, Milk-Based Drinks (Dry and Fluid), Including Enriched  
(per 100 ml of ready-to-use product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Protein:			+
milk, cultured milk products, milk-based drinks	g	2.0 – 5.0	+
sour cream	g, at least	2.5	
cream	g, at least	2.5	+
Fat:			
milk, cultured milk products, milk-based drinks	g	1.5 – 4.0	
cream	g	10 – 20	+
sour cream	g	10 – 20	+
Carbohydrates:			
cultured milk products, milk-based drinks, including added sucrose**	g, not to exceed	16.0	+
	g, not to exceed	10.0	
Carbohydrates:			
milk	g, at least	4.7	+
sour cream	g, at least	3.4	+
cream	g, at least	3.7	+
Mineral substances:			
calcium	mg	105 – 240	+ for enriched products

\* As regards dairy component cultured products, physico-chemical identification indices may be specified in regulatory or technical documents pursuant to which such products are manufactured.

\*\* Substitution of fructose for sucrose shall be allowed in quantity not exceeding 5 grams.

2. Hard, Medium-Hard, Soft and Processed Cheeses for Pre-School and School Age Children (per 100 g of ready-to-use product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Moisture content	per cent, not to exceed	70	
Fat content in dry substance	per cent, not to exceed	55	+
Cooking salt	g, not to exceed	2	

3. Curds and Products Based Thereon, Including with Fruit and Horticultural Components (per 100 g of ready-to-use product)

Criteria and parameters	Units of measurement	Allowable levels	Obligation of labelling
Protein	g, at least	6.0 – 17.0	+
Fat	g	3.5 – 10.0	+
Carbohydrates, including sucrose*	g, not to exceed	16.0 10.0	+
Acidity	degrees Turner, not to exceed	150	

\* Substitution of fructose for sucrose shall be allowed in quantity not exceeding 5 grams.

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**Why is Vitamin B<sub>1</sub> in the form thiamine bromide no longer allowed?**

Forms of Added Micronutrients Permitted for Use in Production of Children's Food Products for Pre-School  
and School Age Children

Name	Form
<b>Vitamins:</b>	
Vitamin A	Retinol acetate; retinol palmitate; beta-carotene
Vitamin D	D <sub>2</sub> ergocalciferol; D <sub>3</sub> cholecalciferol
Vitamin E	D-alpha tocopherol; DL-alpha tocopherol; D-alpha tocopherol acetate; DL-alpha tocopherol acetate
Vitamin B <sub>1</sub>	Thiamine hydrochloride; thiamine bromide; thiamine mononitrate; thiamine chloride
Vitamin B <sub>2</sub>	Riboflavin; riboflavin-5-phosphate, sodium
Vitamin PP (niacin)	Nicotinamide; nicotinic acid
Vitamin B <sub>6</sub>	Pirodixine hydrochloride; pirodixine-5-phosphate; pirodixine dipalmitate
Pantothenic acid	Calcium D-pantothenate, sodium D-pantothenate, dexapanthenol
Vitamin B <sub>12</sub>	Cyanocobalamin, hydroxocobalamin
Folic acid	Folic acid
Vitamin C	L-ascorbic acid; sodium L-ascorbate; calcium L-ascorbate; 6-palmitoyl-L-ascorbic acid (ascorbyl palmitate); potassium ascorbate
Vitamin K	Phylloquinone (phytomenadione)
Biotin	D-biotin
Choline	Choline chloride; choline citrate; choline bitartrate
Inosite	Inosite preparation
Carnitine	L-carnitine; L-carnitine hydrochloride; L-carnitine L-tartrate

<b>Mineral salts (element):</b>	
Calcium	Calcium carbonate Calcium citrates (E 333) Calcium gluconate (E 578) Calcium glycerophosphate (E 383) Calcium lactate (E 327) Calcium orthophosphate (E 341) Calcium chloride
Sodium	Sodium citrate Sodium chloride (E 331) Sodium gluconate Sodium bicarbonate Sodium carbonate Sodium lactate Sodium orthophosphates Sodium hydroxide
Magnesium	Magnesium carbonate (E 504) Magnesium chloride (E 511) Magnesium gluconate (E 580) Magnesium salts of orthophosphoric acid (E 343) Magnesium sulphate (E 518) Magnesium lactate (E 329) Magnesium citrate (E 345) Magnesium oxide Magnesium hydroxide
Potassium	Potassium citrate (E 332) Potassium lactate (E 326) Disubstituted potassium phosphate (GOST 2493) Potassium carbonate Potassium bicarbonate

	Potassium chloride Potassium gluconate Potassium hydroxide
Iron	Iron (II) gluconate (E 579) Iron (II) sulphate 7-hydrate (GOST 4148) Iron (II) lactate (E 585) Iron (II) fumarate Iron (II) diphosphate (pyrophosphate) Iron citrate Iron sulphate
Copper	Copper carbonate Copper citrate Copper gluconate Copper sulphate (E 519)
Zinc	Zinc acetate Zinc sulphate Zinc chloride Zinc lactate Zinc citrate Zinc gluconate Zinc oxide
Manganese	Manganese carbonate Manganese chloride Manganese citrate Manganese gluconate Manganese sulphate
Iodine	Potassium iodine Sodium iodine Potassium iodate Iodcasein*
Selenium	Sodium selenite, sodium selenate
Phosphorus	Phosphates

\* Used to enrich milk for children over 2 years of age.

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Allowable Levels of Content of Micronutrients in Fluid Milk Mixtures, Dry Milk Mixtures for Babies

Name	Units of measurement	Parameter	Obligation of labelling
Adapted milk mixtures (dry, fluid, fresh and cultured), products based on partially hydrolysed proteins for babies from birth to six months (initial mixtures)			
Mineral substances:			
calcium	mg/l	330 - 700	+
phosphorus	mg/l	150 - 400	+
calcium/phosphorus	ratio	1.2 - 2.0	
potassium	mg/l	400 - 850	+
sodium	mg/l	150 - 300	+
magnesium	mg/l	30 - 90	+
copper	mcg/l	300 - 600	+
manganese	mcg/l	10 - 300	+
iron	mg/l	3 - 9	+
zinc	mg/l	3 - 10	+
chlorides	mg/l	300 - 800	+
iodine	mcg/l	50 - 150	+
selenium	mcg/l	10 - 40	+
ash	g/l	2.5 - 4	
Vitamins:			
retinol (A)	mcg-equ/l	400 - 1000	+
tocopherol (E)	mg/l	4 - 12	+
calciferol (D)	mcg/l	7.5 - 12.5	+
vitamin K	mcg/l	25 - 100	+
thiamine (B1)	mcg/l	400 - 2100	+
riboflavin (B2)	mcg/l	500 - 2800	+
pantothenic acid	mcg/l	2700 - 14000	+
pyridoxine (B6)	mcg/l	300 - 1000	+
niacin (PP)	mcg/l	2000 - 10000	+
folic acid (Bc)	mcg/l	60 - 350	+
cyanocobalamin (B12)	mcg/l	1.0 - 3.0	+
ascorbic acid (C)	mg/l	55 - 150	+
inosite	mg/l	20 - 280	+
choline	mg/l	50 - 350	+
biotin	mcg/l	10 - 40	+
L-carnitine	mg/l, not to exceed	20.0 (when added)	+
lutein	mcg/l, not to exceed	250 (when added)	+
nucleotide (total of cytidine-, uridine-, adenosine-, guanosine- and inosine-5 monophosphates)	mg/l, not to exceed	35 (when added)	+
Follow-up adapted milk mixtures (dry, fluid, fresh and cultured), products based on partially hydrolysed proteins for babies over the age of six months			
Mineral substances:			
calcium	mg/l	400 - 900	+
phosphorus	mg/l	200 - 600	+
calcium/phosphorus	ratio	1.2 - 2.0	
potassium	mg/l	500 - 1000	+
sodium	mg/l	150 - 300	+
magnesium	mg/l	50 - 100	+
copper	mcg/l	400 - 1000	+

manganese	mcg/l	10 – 300	+
iron	mg/l	7 - 14	+
zinc	mg/l	4 -10	+
chlorides	mg/l	300 – 800	+
iodine	mcg/l	50 – 350	+
selenium	mcg/l	10 – 40	+
ash	g/l	2.5 – 6	
Vitamins:			
retinol (A)	mcg-equ/l	400 – 1000	+
tocopherol (E)	mg/l	4 – 20	+
calciferol (D)	mcg/l	8 - 21	+
vitamin K	mcg/l	25 – 170	+
thiamine (B1)	mcg/l	400 – 2100	+
riboflavin (B2)	mcg/l	500 – 2800	+
pantothenic acid	mcg/l	3000 – 14000	+
pyridoxine (B6)	mcg/l	400 - 1200	+
niacin (PP)	mcg/l	3000 – 10000	+
folic acid (Bc)	mcg/l	60 – 350	+
cyanocobalamin (B12)	mcg/l	1.5 – 3.0	+
ascorbic acid (C)	mg/l	55 – 150	+
choline	mg/l	50 – 350	+
biotin	mcg/l	10 – 40	+
inosite	mg/l	20 - 280	+
L-carnitine	mg/l, not to exceed	20 (when added)	+
lutein	mcg/l, not to exceed	250 (when added)	+
nucleotide (total of cytidine-, uridine-, adenosine-, guanosine- and inosine-5 monophosphates)	mg/l, not to exceed	35 (when added)	+
Adapted milk mixtures (dry, fluid, fresh and cultured), products based on partially hydrolysed proteins for children from birth to twelve months			
Mineral substances:			
calcium	mg/l	400 - 900	+
phosphorus	mg/l	200 - 600	+
calcium/phosphorus	ratio	1.2 – 2.0	
potassium	mg/l	400 - 800	+
sodium	mg/l	150 – 300	+
magnesium	mg/l	40 - 100	+
copper	mcg/l	300 - 1000	+
manganese	mcg/l	10 – 300	+
iron	mg/l	6 - 10	+
zinc	mg/l	3 -10	+
chlorides	mg/l	300 – 800	+
iodine	mcg/l	50 – 350	+
selenium	mcg/l	10 – 40	+
ash	g/l	2.5 – 6.0	+
Vitamins:			
retinol (A)	mcg-equ/l	400 – 1000	+
tocopherol (E)	mg/l	4 – 12	+
calciferol (D)	mcg/l	8 - 21	+
vitamin K	mcg/l	25 – 170	+
thiamine (B <sub>1</sub> )	mg/l	0.4 – 2.1	+
riboflavin (B <sub>2</sub> )	mg/l	0.5 – 2.8	+
pantothenic acid	mg/l	2.7 – 14.0	+
pyridoxine (B <sub>6</sub> )	mg/l	0.3 – 1.2	+
niacin (PP)	mg/l	3.0 – 10.0	+
folic acid (Bc)	mcg/l	60 – 350	+
cyanocobalamin (B <sub>12</sub> )	mcg/l	1.5 – 3.0	+



ascorbic acid (C)	mg/l	55 – 150	+
inosite	mg/l	20 - 280	+
choline	mg/l	50 – 350	+
biotin	mcg/l	10 – 40	+
L-carnitine	mg/l, not to exceed	20 (when added)	+
lutein	mcg/l, not to exceed	250 (when added)	+
nucleotide (total of cytidine-, uridine-, adenosine-, guanosine- and inosine-5 monophosphates)	mg/l, not to exceed	35 (when added)	+
Follow-up partially adapted milk mixtures (dry, liquid, fresh and cultured), products based on partially hydrolysed proteins for babies over the age of six months			
Mineral substances:			
calcium	mg/l	600 - 900	+
phosphorus	mg/l	200 - 600	+
calcium/phosphorus	ratio	1.2 – 2.0	
potassium	mg/l	400 - 1000	+
sodium	mg/l	150 – 350	+
magnesium	mg/l	50 - 100	+
copper	mcg/l	400 - 1000	+
manganese	mcg/l	10 – 650	+
iron	mg/l	5 - 14	+
zinc	mg/l	4 -10	+
chlorides	mg/l	300 – 800	+
iodine	mcg/l	50 – 350	+
ash	g/l	2.5 – 6.0	+
Vitamins:			
retinol (A)	mcg-equ/l	400 – 1000	+
tocopherol (E)	mg/l	4 – 12	+
calciferol (D)	mcg/l	7 - 21	+
thiamine (B <sub>1</sub> )	mg/l	0.4 – 2.1	+
riboflavin (B <sub>2</sub> )	mg/l	0.5 – 2.8	+
pantothenic acid	mg/l	2.5 – 14.0	+
pyridoxine (B <sub>6</sub> )	mg/l	0.4 – 1.2	+
niacin (PP)	mg/l	3.0 – 10.0	+
folic acid (Bc)	mcg/l	60 – 350	+
cyanocobalamin (B <sub>12</sub> )	mcg/l	1.5 – 3.0	+
ascorbic acid (C)	mg/l	55 – 150	+

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List of Food Additives and Flavourants Permitted to Use in Production of Children's Food Products on Milk Basis, Milk Mixtures (Including Dry Milk Mixtures), Milk Drinks (Including Dry Milk Drinks), Milk Porridges for Babies in the First Year of Life and Babies from One to Three Years of Age

Food additive (index E)	Food products	Maximum level in ready children's food products
Azote (E 941) Argon (E 938) Helium (E 939) Carbon dioxide (E 290)	Supplemental feeding products	In conformity with producer's technical documents
Alginate acid (E 400) Potassium alginate (E 402) Calcium alginate (E 404) Sodium alginate (E 401) (separately or in combination)	Desserts, puddings	500 mg/kg
L-Ascorbyl palmitate (E 304) Tocopherol concentrate (E 306) Alpha-tocopherol (E 307) Gamma-tocopherol (E 308) Delta-tocopherol (E 309) (separately or in combination)	Fat-containing products	100 mg/kg
L-Ascorbic acid (E 300) Calcium L-ascorbate (E 302) Sodium L-ascorbate (E 301) (separately or in combination in ascorbic acid equivalent)	Fat-containing, grain-based products, including biscuits and rusks	200 mg/kg
Potassium hydroxide (E 525) Calcium hydroxide (E 526) Sodium hydroxide (E 524) (only to regulate active acidity)	Supplemental feeding products	In conformity with producer's technical documents
Guar gum (E 412) Gum arabic (E 414) Carob gum (E 410) Xanthan gum (E 415) Pectins (E 440) (separately or in combination)	Supplemental feeding products, antireflux mixtures for infant nutrition, hypoallergic products	10 g/kg
Ammonium carbonates (E 503) Potassium carbonates (E 501) Sodium carbonates (E 500) (only as a leavening agent)	Supplemental feeding products	In conformity with producer's technical documents
Calcium carbonates (E 170) (only to regulate active acidity)	Supplemental feeding products	In conformity with producer's technical documents
Citric acid (E 300) Potassium citrates (E 332) Calcium citrates (E 333) Sodium citrates (E 331) (separately or in combination; only to regulate active acidity)	Supplemental feeding products	In conformity with producer's technical documents
Modified starches: Acetylated distarch adipate (E 1422) Acetylated distarch phosphate (E 1414) Acetylated starch (E 1420) Acetylated oxidized starch (E 1451)	Supplemental feeding products	50 g/kg

Distarch phosphate (E 1412) Monostarch phosphate (E 1410) Oxidized starch (E 1404) Phosphated distarch phosphate (E 1413) Starch sodium octenyl succinate (E 1450) (separately or in combination)		
Lactic acid (E 270) Potassium lactate (E 326) Calcium lactate (E 387) Sodium lactate (E 325) (separately or in combination; only to regulate active acidity)**	Supplemental feeding products	In conformity with producer's technical documents
Hydrochloric acid (E 507)	Supplemental feeding products	In conformity with producer's technical documents
Acetic acid (E 260) Potassium acetate (E 261) Calcium acetate (E 387) Sodium acetate (E 262) (separately or in combination; only to regulate active acidity)	Supplemental feeding products	In conformity with producer's technical documents
o-phosphoric acid (E 339) (added phosphate in P <sub>2</sub> O <sub>5</sub> equivalent only to regulate active acidity)	Supplemental feeding products	1 g/kg
Malic acid (E 296) (only to regulate active acidity)***	Supplemental feeding products	In conformity with producer's technical documents
Natural flavourants	Supplemental feeding products	In conformity with producer's technical documents

\*\* Only L(+) – forms of lactic, tartaric, and malic acids and their salts – may be used to make supplemental feeding products

\*\*\* L(+) – lactic acid obtained from non-pathogenic and non-toxic microorganism strains – may be used to make cultured milk products

**Note:**

It is allowed to use food additives to make children's food products as part of another product. The content of gum arabic (E 414) in such products must not exceed 150 g/kg, and of silicon dioxide amorphous (E 551) – 10 g/kg. As part of vitamin B<sub>12</sub>, mannite is allowed in children's food when it is used as a dissolvent-carrying agent; vitamin B<sub>12</sub> content must not exceed 1 mg/kg of mannite. Sodium ascorbate (E 301) is allowed as part of the covering of polyunsaturated fatty acid preparations. Ready-to-use products must have no more than 10 mg/kg of gum arabic or 75 mg/kg of sodium ascorbate.

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Allowable Deviations from Actual Values of a Ready Product's Labelled Nutritional Value Parameters

Proteins, fat, carbohydrates, sugar, organic acids, alcohol, fibre, fatty acids	Limit of allowable deviations from actual values of a ready products' labelled nutritional value parameters, +/-
less than 10 g per 100 g of product	+/- 10%
10 – 40 g per 100 g of product	+/- 15%
more than 40 g per 100 g of product	+/- 6 g
Sodium, magnesium, calcium, phosphorus, iron, zinc, vitamins C, B <sub>1</sub> , B <sub>2</sub> , B <sub>6</sub> , pantothenic acid, niacin, cholesterol	+/- 20%
Vitamins A, D, E, folic acid, B12, biotin, iodine	+/- 30% (not counting enhanced vitamin content in the making of a ready product)

Note. Actual values of fat, proteins, carbohydrates, organic acids, alcohol, fibre, fatty acids, vitamins and mineral substances content must conform to the requirements specified in regulatory or technical documents or standards of organisations, pursuant to which dairy products are produced and may be identified.

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## Requirements for Russia Federation and Customs Union market access on meat and meat products

- The aim of this document is to help food business operators of each EU Member States to recognize the food safety requirements for the export of milk and dairy products to the Russia Federation (hereinafter "the RF") and the Customs Union (hereinafter "the CU").
- There are certain steps 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, and provision of a veterinary certificate...the products must also be labelled according to the provisions of the importing country.
- 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, 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.
- The registration body in the RF is Rospotrebnadzor
  - Address: build. 5,7, house 18, Vadkovskiy per., Moscow, 127994, Russia
  - E-mail: depart@gsen.ru
  - Web-site: www.rospotrebnadzor.ru
  - Applicants were able to sign up on a waiting list to filing documents starting on July 2011.
  - The fee is 200 rubles.

## Sanitary and Epidemiological Certification Requirements

According to the draft CU TR on food safety, only Veterinary Certificates would be required for non-processed animal products, while only a Declaration of Conformity or State Registration Certificate would be required for products, which have undergone a treatment which based on scientific evidence eliminated contamination.

### • State Registration Certificates

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.

- According to 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
  - Regulations and common form of the state registration certificates of the CU [en](#) [ru](#) [pdf](#) (Appendix No 2 and No 3)
  - List of goods subject to state registration [en](#) [ru](#) [pdf](#) (Part II)
    - Mineral water, bottled potable water, energy drinks, alcoholic production;
    - Specialized foodstuffs, including food for children, food for pregnant and nursing women, dietary products, nutritive for athletes, nutraceuticals, raw materials for nutraceuticals, organic products;
    - Foodstuffs produced using genetically modified organisms;
    - Food additives, complex food additives, flavouring agents, technological aids including enzymatic agents.

- o Cosmetic products; oral hygiene products;
  - o Disinfectants, disinfectants and disinfestations;
  - o Household chemicals;
  - o Potentially hazardous chemical and biological substances and preparations made on their basis.
  - o Materials and equipment of water conditioning, intended for use in utility and drinking water supply systems.
  - o Personal hygiene objects for children and adults;
  - o Products meant for contact with foodstuffs (except the tableware, table belongings, manufacturing equipment) and others
- The transition period is until 1 January 2012 for the CU Parties to implement the harmonized State registration certificates, 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.
  - Applicant for issuing of certificate of state registration may be the producer (manufacturer) or importer (supplier) of the product.
  - State registration certificates should be obtained only once for each type of product (unless required otherwise by the RF/CU legislation).

- **Certificate and Declaration of Conformity**

*According to Decision No 319 of 18 June 2010 of the Customs Union Commission, as amended by Decisions N 343 of 17.08.2010, N 383 of 20.09.2010, N 431 of 14.10.2010, N 491 of 08.12.2010.*

- 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](#)
- Previously issued on single form 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 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 subjected to mandatory confirmation of conformity which issued by the manufacturer to declare that the product is in conformity with the essential requirements of the technical regulations and provides the evidence to support.
  - The CoC is for a product subjected to mandatory confirmation of conformity which is made on the basis of results obtained from testing samples of goods by certification body or a testing laboratory.
  - Applicant for issuing of DoC or CoC may be the producer (manufacturer) or importer (supplier) of the product,
  - Meat and meat products are not subjected to mandatory confirmation of conformity.

- According to the draft of TR of the CU on concerning safety of meat and meat products, before issuing 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 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



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- **Veterinary certificate**

The existing EU-RF veterinary certificates remain valid 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 1.1.2013, the bilateral certificates may be further prolonged if the exporting competent authority has requested, by 1.1.2013, to negotiate a specific certificates which may have provisions that diverge from CU common veterinary requirements and common forms of certificates. In that case, the existing bilateral certificates are prolonged until the negotiations on those new bilateral certificates are concluded.

- Exporters are cautioned that consignee information on the export certificate should indicate the actual consignee taking possession of the product upon entry into the RF/CU.
- Prior to export, inspection and/or laboratory testing will be conducted to ensure that product intended to export to the RF/CU complies with the requirements of the RF/CU.
- The EU-RF veterinary certificates form:



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- Pork meat and raw meat preparations



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- Deboned beef meat and raw meat preparations



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- Beef meat with bones



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- Poultry meat and raw meat
- Canned meat, salamis and other ready for consumption meat



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products

- The eligible establishment is responsible to assure:
  - The competent veterinarian signing the document that the animal from which the meat is derived and the products is eligible and complies with all certification statements. Records supporting the assurances by establishment management must be available for review.
  - Microbiological, chemical-toxicological and radiological characteristics of meat and meat products correspond to actual veterinary and sanitary rules and requirements of the RF/CU.
- Legislative requirements:
  - General
    - 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](#)
    - CU
      - Technical regulations of the CU: Food safety (draft only)
  - Sanitary and epidemiologic
    - RF
      - SanPiN 2.3.2.1078-01- Food raw material and foodstuff - Hygienic requirements for safety and nutrition value of foodstuff  
Annex 1.1 on meat and meat related products [en](#) [es](#) [fr](#) [pdf](#) (need to be updated to amendment 24)
    - CU
      - Uniform sanitary and epidemiological and hygienic requirements for products subject to sanitary and epidemiological supervision (control)
        - Chapter I: General requirements [ru](#) [pdf](#)
        - Chapter II, section 1: Safety requirements and nutritional value of food [en](#) [ru](#) [pdf](#)
      - Technical regulations of the CU: Concerning safety of
        - meat and meat products (draft only)



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- Supplement 1: Safety indicators
- Supplement 2: Hygienic requirements to safety



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- of preserved meat products
- Supplement 3: Tolerable levels of cesium-137



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- and strontium-90 radionuclides
- Supplement 4: Typical schemes for compliance



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declaration

- Hygienic Standards
  - RF
    - GN 1.2.2701-10 "Hygienic regulations of pesticides in the environment (list)" [ru](#) pdf
    - General provisions of GN 1.2.2701-10: [en](#) pdf
    - Overview of Russian pesticides requirements, developed by Freshfel (NON OFFICIAL DOCUMENT)
  - CU
    - Chapter II, section 15: Requirements for pesticides [ru](#) pdf
    - Chapter II, section 16: Requirements for food contact material [ru](#) pdf
    - Consolidation of MRLs set in the Customs Union requirements (Chapter II, section 15 of the Common sanitary and epidemiological requirements)
- Veterinary surveillance
  - Regulation on sanitary and epidemiological surveillance at the Customs Union border [en](#) [ru](#) pdf - Annexes [en](#)
  - Veterinary surveillance of meat products imported into the Russian Federation in compliance with the requirements of the Customs Union [en](#) pdf (Presentations by Rosselkhoz nadzor)
  - The main principles of laboratory control [en](#) pdf (Presentations by Rosselkhoz nadzor)
- Guidance
  - MUK 4.2.1847-04 on evaluation of shelf-life and storage conditions [en](#) pdf
  - GOST P 8.563 – 2009 on methods of measurement [ru](#) pdf

## Procedure for establishment approval

All establishments interested in exporting meat to the RF/CU must be audited by the CA based on the EU legislation and the checklist with the identified additional requirements for export to the RF/CU.

- Specific veterinary and sanitary requirements that were checked by the CA were, amongst others:
  - Official veterinary supervision of slaughtered animals ante mortem examination and temperature recording possibility in case of suspicion of disease during clinical examination, availability of the food chain information, in particular the antibiotic treatments
  - Instructions for the post mortem inspection, including inspection of offal -records of the PM
  - Instructions for trichinella test - records of the trichinellae examination
  - Instructions for removal, marking, disposal of SRMs,
  - Instructions for veterinary health marking
  - Provisions during storage to ensure that meat non eligible for export to the RF cannot be mixed with products eligible for export to the RF.
  - Origin of the raw meat (for cutting plants and cold storages)
  - Layout of the establishment, in particular for separation of clean and dirty lines
  - Quarantine area for suspected animals
  - Veterinary control of animals which died during transport
  - Build up the hygiene zones
  - Training and health investigation of the personnel
  - Traceability of organs and other parts of the carcasses
  - Control on the water used during production
- Documentation to be prepared and classified ahead of the RF/CU inspectors' visit in order to facilitate operative work:
  - Plan of the layout of the factory.
  - All the Acts/ Reports of the state veterinary service for latest three years with relation to the factory, in particular the Member State CA report showing the compliance of the establishment with the RF/CU requirements has been checked.
  - All copies of the veterinary certificates or internal documents on the products exported to Russia for latest three years.
  - All laboratory tests carried out on the animals and the meat products in relation to food safety measures, classified by year with the tested object outlined (blood, urine, meat, liver, kidney etc)
- Reference document for meat product inspection (translated in English):



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- From France



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- From Germany

- Draft of guideline for inspection of meat product (RF committed in the



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context of WTO accession to revise this draft)

### **Listing of the 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 Belarus website: [www.mshp.minsk.by](http://www.mshp.minsk.by), and Kazakhstan website: [www.minagri.gov.kz](http://www.minagri.gov.kz).
- 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.
- Exporters should be prepared for requests for the following documents from importers:
  - Information about the use of pesticides indicating the name of the pesticide and the pesticide expiration date
  - Veterinary certificate confirming the quality and safety of products for human consumption.

### **Import Permits**

According to the Administrative Regulation Approved by the Order of Ministry of Agriculture of the RF No. 404 of 7 November 2011, import permits are requested for goods subject to veterinary control, approved by the CU Commission Decision of 18



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June, 2010.

- Annex 4 to 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" [en](#) [ru](#) pdf will only enter into force on the date of Russia's accession to the WTO.
- 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 check with the importer to assure that the importer has an import permit. If the importer does not have a valid import permit, the meat product will not be allowed entry.
- Import permits should be dated in advance of shipping and copies of export documents should be sent with the ship. Original documents are not required to be on the ship.
- Import permits are issued on a calendar year; permits for next year are issued since December 1 of the year which is previous to the year of action of permit.

- The RF and Belarus used the common automated information system ARGUS, and Kazakhstan used its own system. (It is necessary to register the system before using.)
  - Until the CU common electronic system is put in place, import permits will be issued by the CU Parties competent authorities, and are recognised by the other CU Parties as allowing importation of products into the CU territory.
- Following products are not required for permit registration:
  - Feed additives for dogs and cats, as well as fodder for cats and dogs which have had heat-treated (the temperature is not below +70 °C, for at least 20 minutes) in consumer packaging;
  - All kinds of stuffed animals and fish, or their fragments, the last complete taxidermy treatment, subject to the submission of documents confirming their purchase at retail;
  - Hunting trophies from regions free from diseases specified in paragraph 3 of the chapter 38 of the United veterinary-sanitary requirements to the goods subject to veterinary control, approved by the Decision of the CU Commission as of 18 June 2010 No. 317, as well as originating from regions with an unsafe situation in respect of mentioned diseases, but which have been processed in accordance with the rules adopted in the country of origin of trophies, which is confirmed by a veterinary certificate;
  - Finished products of animal origin in their original packaging, marked by the manufacturer, imported by individuals for personal use up to 5 kg per person, subject to being in the epizootic of the state of manufacture and export of the state of these products.
- "General Permit" which was issued based on a risk assessment for certain sectors in a particular country and allowed any importer to import any volume of the controlled goods from that country.

### **Pre-Notification**

According to 18 June 2010 of the Common Procedures of Veterinary Control in CU Commission Decision No. 317, when the controlled goods were imported by sea, pre-notification on actual shipment of the lots to CU recipient was requested. (Legal text: [http://ec.europa.eu/food/international/trade/docs/reg\\_vet\\_CU\\_border\\_en.pdf](http://ec.europa.eu/food/international/trade/docs/reg_vet_CU_border_en.pdf), these rules are currently under revision.)

- It is the responsibility of the exporting establishment or exporter to assure that notification is provided;
- 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 electronically:
  - Number of the veterinary certificate
  - Date of execution of the
  - Veterinary accompanying document
  - Number and name of the manufacturer
  - Receiving company in the CU (name of the CU consignee)
  - Vehicle (means of transport)

- Number of seal
- Product type
- Net weight (tons)
- Port of shipping
- Port of destination
- Pre-notification can be done every 10 or 15 days.

## Labelling

The primary RF legislation of labelling is "The General Requirements for Consumer Information Regarding Foodstuffs, GOST P 51074-2003". (GOST are non binding. The CU will soon adopt a TR on food labelling.)

- According to the GOST, the label must contain following information in Russian:
  - General information
    - Name of the product (including the state and treatment of the product, i.e. "concentrated", "reconstructed," "pasteurized," "UHT-treated , "" frozen, "" genetically modified "and others).
    - The category, grade (if any);
    - Name, address, and establishment number of the manufacturer (including the organization authorized to accept claims from consumers in RF) (name of the company may be in English only);
    - Country of origin;
    - Trademark;
    - Net weight or quantity;
    - Ingredient statement;
    - Food additives, biologically active additives, flavourings, components of non-traditional composition;
    - Nutritional value (i.e. calories per gram):
      - List a recommended daily allowance in accordance with established procedures,
      - Indicate if >2% of the recommended daily allowance of proteins, fats, carbohydrates, or calories is included in a 100-gram serving,
      - Indicate if a 100-gram serving contains >5% of the daily recommended allowance of minerals or vitamins,
      - May list the basic mineral substances and vitamins inherent in the product without indicating their quantity;
    - Date of production and date of packing;
    - Conditions of storage;
    - Expiry date;
    - Instructions for use - for processed products;
  - Additional information:
    - Frozen or chilled - for refrigerated meat products, offal, consumer-ready products, or poultry meat;
    - Vacuum packs - for meat products , culinary items, sausage, consumer-ready products, or poultry meat;
    - Percentage of meat, fat, offal, and plant-origin components - for canned products
    - Method of preparation for consumption- for canned products require special treatment before use;

- 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 percent threshold for each biotech (GMM) component in food products for mandatory labelling.
  - “Product contains live genetically modified microorganisms” - for products containing viable GMM
  - “Product is obtained based on genetically modified microorganisms” - for products containing unviable GMM
  - “Product have 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 diet products, baby-food, and other special products shall meet special requirements stipulated for these products in relevant GOSTs and in SanPiN 2.3.2.1078-01.
- Feeds are not subject to labelling.
- According to the draft of TR of the CU concerning safety of meat and meat products, the consumer packing of meat products shall contain the following information:
  - General information
    - Name of the Meat (including the thermal conditions and specific treatment of the product, i.e. "smoked", "cooled", "frozen" ).
    - Ingredient statement: list meat and non-meat ingredients in the order of decreasing the weight ratios of the ingredients.
    - Nutritional supplements, dietary supplements, flavours, and components of non-traditional composition i.e. GMO,
    - Nutritional value
      - Indicate if >2% of the recommended daily allowance of proteins, fats, carbohydrates, or calories is included in a 100-gram serving,
      - Indicate if a 100-gram serving contains >5% of the daily recommended allowance of minerals or vitamins,
    - Production Date, Expiry Date.
    - Name and address of 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 at the CU territory.
      - EAC label shall attest its compliance with the requirements of all Technical regulations of the CU.
  - Additional information:
    - Using the mechanically deboned meat should specify in the product content separately.

- The weight ratio of the main ingredients- for purées, filling, ham preserves, and meat porridges.
- 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.

### **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 consultation hot-lines to guide foreign economic traders and businesses, information is posted on the official Russian Government website: <http://government.ru/docs/11253/>:

- Ministry of Economic Development for Russia: tel. +7-495-651-77-50 (Weekdays: from 9:00 AM to 9:00 PM; Saturdays - from 9:00 AM to 3 PM)
- Federal Custom Service for Russia: +7-495-740-18-18 (24 hours)
- Russian Federal Service for Consumer Rights Protection and Well-Being of Population (Rospotrebnadzor): 8-800-100-00-04 (Weekdays: from 10:00 AM to 5:00 PM)
- Russian Federal Service for Veterinary and Phytosanitary Surveillance - Rosselkhoznadzor (VPSS): +7-915-022-14-17 (24 hours)
- Secretariat of the Customs Union Commission +7-495-604-40-38 (Weekdays: from 9:00 AM to 6:00 PM)
- Information pertaining to the Customs Union workings and documents reference: [www.tsouz.ru](http://www.tsouz.ru)
- The Russian Ministry of Economic Development: <http://www.economy.gov.ru/minec/activity/sections/>
- The Federal Customs Service of Russia: <http://www.customs.ru/ru/>
- Rospotrebnadzor: <http://www.rospotrebnadzor.ru/>
- The Federal Veterinary and Phytosanitary Surveillance Service: <http://www.fsvps.ru/fsvps>

## Requirements for Russia Federation and Customs Union market access on milk and dairy products

- The aim of this document is to help food business operators of each EU Member States to recognize the food safety requirements for the export of milk and dairy products to the Russia Federation (hereinafter "the RF") and the Customs Union (hereinafter "the CU").
- There are certain steps 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, and provision of a veterinary certificate...the products must also be labelled according to the provisions of the importing country.
- 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, 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.
- The registration body in the RF is Rospotrebnadzor
  - Address: build. 5,7, house 18, Vadkovskiy per., Moscow, 127994, Russia
  - E-mail: depart@gsen.ru
  - Web-site: www.rospotrebnadzor.ru
  - Applicants were able to sign up on a waiting list to filing documents starting on July 2011.
  - The fee is 200 rubles.

## Sanitary and Epidemiological Certification Requirements

According to the draft CU TR on food safety, only Veterinary Certificates would be required for non-processed animal products, while only a Declaration of Conformity or State Registration Certificate would be required for products, which have undergone a treatment which based on scientific evidence eliminated contamination.

### • State Registration Certificates

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.

- According to 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
  - Regulations and common form of the state registration certificates of the CU [en](#) [ru](#) [pdf](#) (Appendix No 2 and No 3)
  - List of goods subject to state registration [en](#) [ru](#) [pdf](#) (Part II)  
The milk-relate products are subjected to Group 4 from 0401 to 0406, that are made with the use of genetically engineered or modified organisms and (or) are specialized foodstuffs, biologically active dietary supplements or raw material for their production, organic products, food additives, complex food additives, flavouring agents.
    - From 0401 - Milk and cream (except for crude and feed milk), neither concentrated nor containing added sugar or other sweetening matter.



- From 0402 - Milk and cream, concentrated or containing added sugar or other sweetening matter.
- From 0403 - Buttermilk, curdled milk and cream, yogurt, kephir and other fermented or acidified milk and cream, whether or not concentrated or containing added sugar or other sweetening matter or flavoured or containing added fruits, nuts or cocoa.
- From 0404 - Whey, whether or not concentrated or containing added sugar or other sweetening matter: products consisting of natural milk constituents, whether or not containing added sugar or other sweetening matter, not elsewhere specified or included.
- From 0405 - Butter and other fats and oils derived from milk; dairy spreads.
- From 0406 - Cheese and curd.
- The transition period is until 1 January 2012 for the CU Parties to implement the harmonized State registration certificates, 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.
- Applicant for issuing of certificate of state registration may be the producer (manufacturer) or importer (supplier) of the product.
- State registration certificates should be obtained only once for each type of product (unless required otherwise by the RF/CU legislation).

- **Certificate and Declaration of Conformity**

*According to Decision No 319 of 18 June 2010 of the Customs Union Commission, as amended by Decisions N 343 of 17.08.2010, N 383 of 20.09.2010, N 431 of 14.10.2010, N 491 of 08.12.2010.*

- 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](#)
- Previously issued on single form 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 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 subjected to mandatory confirmation of conformity which issued by the manufacturer to declare that the product is in conformity with the essential requirements of the technical regulations and provides the evidence to support.
  - The CoC is for a product subjected to mandatory confirmation of conformity which is made on the basis of results obtained from testing samples of goods by certification body or a testing laboratory.

- Applicant for issuing of DoC or CoC may be the producer (manufacturer) or importer (supplier) of the product,
- Milk and dairy products are not subjected to mandatory confirmation of conformity. Please refer to the draft of Technical regulations of the EurAsEC: Milk and dairy products Article 5 for detail of conformity assessment of milk and dairy products.

- **Veterinary certificate**

The existing EU-RF veterinary certificates remain valid 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 1.1.2013, the bilateral certificates may be further prolonged if the exporting competent authority has requested, by 1.1.2013, to negotiate a specific certificates which may have provisions that diverge from CU common veterinary requirements and common forms of certificates. In that case, the existing bilateral certificates are prolonged until the negotiations on those new bilateral certificates are concluded.

- Exporters are cautioned that consignee information on the export certificate should indicate the actual consignee taking possession of the product upon entry into the RF/CU.
- Prior to export, inspection and/or laboratory testing will be conducted to ensure that product intended to export to the RF/CU complies with the requirements of the RF/CU.
- The EU-RF veterinary certificates form on milk and milk products:



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



- The eligible establishment is responsible to assure:
  - The competent veterinarian signing the document that the animal from which the meat is derived and the products is eligible and complies with all certification statements. Records supporting the assurances by establishment management must be available for review.
  - Microbiological, chemical-toxicological and radiological characteristics of milk and milk products correspond to actual veterinary and sanitary rules and requirements of the RF/CU.
- Legislative requirements:
  - General
    - RF
      - No. 88-FZ of June 12, 2008 "Technical Regulations for Milk and Milk Products" as amended by Federal Law of 22 July No 163-FZ [en](#) [ru](#) [pdf](#)
      - RF presentation of Federal law No. 88-FZ of June 12, 2008 "Technical Regulations on Milk and Milk Products" [pdf](#)




Comparative  
ble EU- RF updat.

- Comparative table of EU-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
- CU
  - Technical regulations of the CU: Food safety (draft only)
- Sanitary and epidemiologic
  - RF
    - SanPin 2.3.4.551-96 [ru](#) [en](#) pdf "On production of milk and milk products"- Sanitary regulations
  - CU
    - Uniform sanitary and epidemiological and hygienic requirements for products subject to sanitary and epidemiological supervision (control)
      - Chapter I: General requirements [ru](#) pdf
      - Chapter II, section 1: Safety requirements and nutritional value of food [en](#) [ru](#) pdf
    - Technical regulations of the EurAsEC: Milk and dairy products (draft only)
- Hygienic Standards
  - RF
    - GN 1.2.2701-10 "Hygienic regulations of pesticides in the environment (list)" [ru](#) pdf
    - General provisions of GN 1.2.2701-10: [en](#) pdf
    - Overview of Russian pesticides requirements, developed by Freshfel (NON OFFICIAL DOCUMENT)
  - CU
    - Chapter II, section 15: Requirements for pesticides [ru](#) pdf
    - Chapter II, section 16: Requirements for food contact material [ru](#) pdf
    - Consolidation of MRLs set in the Customs Union requirements (Chapter II, section 15 of the Common sanitary and epidemiological requirements)
- Veterinary surveillance
  - Regulation on sanitary and epidemiological surveillance at the Customs Union border [en](#) [ru](#) pdf - Annexes [en](#)
  - The main principles of laboratory control [en](#) pdf (Presentations by Rosselkhoznadzor)
- Guidance

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

▪ Others

- RF
  - Texts applicable to Milk and Dairy products  pdf  
(need to be updated)
- CU
  - Technical regulations of the CU: Safety Requirements to Food Additives, Flavourings and Processing Aids (draft only)



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- Technical regulations of the CU: On safety of specialized food products, dietary, curative and prophylactic food (draft only)



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





## Procedure for establishment approval

All establishments interested in exporting milk and dairy products to the RF/CU must be audited by the CA based on the EU legislation and the checklist with the identified additional requirements for export to the RF/CU.

- Checklist for RF/CU inspection preparation (need to be revise after TR of EurAsEC enter into force, comparative table of EurAsEC-RF Appendix for



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reference.

- Milk processing plant    pdf
- Dairy farm    pdf

- Reference document for meat product inspection (translated in English):



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- From Germany



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- From France

- Draft of guideline for inspection of milk and dairy products (need to be



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rewritten)

### **Listing of the 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 Rosselkhozndadzor website:  
[http://fsvps.ru/fsvps/importExport/index.html?\\_language=ru](http://fsvps.ru/fsvps/importExport/index.html?_language=ru)
- Instruction for search the website:
  - Clicking on the country flag, you will arrive on a page dedicated to one country, below the flag you will find the 4 following hypertext links:
    - The first link "Сводная информация" is an overview for the country of restrictions and the number of establishment approved
    - The second link "Ограничения на ввоз" is the list of restrictions and legal reference of these ones
    - The third link "Списки предприятий" is the list of the establishments
    - The fourth link "Ветсертификаты" gives the veterinary certificates agreed for this country.
- The lists of EU approved establishments for the export to CU are also available on Belarus website: [www.mshp.minsk.by](http://www.mshp.minsk.by), and Kazakhstan website: [www.minagri.gov.kz](http://www.minagri.gov.kz).
- Exporters should be prepared for requests for the following documents from importers:
  - Information about the use of pesticides indicating the name of the pesticide and the pesticide expiration date
  - Veterinary certificate confirming the quality and safety of products for human consumption.

### **Import Permits**

According to the Administrative Regulation Approved by the Order of Ministry of Agriculture of the RF No. 404 of 7 November 2011, import permits are requested for goods subject to veterinary control, approved by the CU Commission Decision of 18



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June, 2010.

- Annex 4 to 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" [en](#) [ru](#) [pdf](#) will only enter into force on the date of Russia's accession to the WTO.
- 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 check with the importer to assure that the importer has an import permit. If the importer does not have a valid import permit, the product may not be allowed entry.
- The exporter must be on a list of enterprises that are inspected by the State Veterinary Service of the RF/CU and listed as enterprises eligible to export to the RF/CU.
- Import permits should be dated in advance of shipping and copies of export documents should be sent with the ship. Original documents are not required to be on the ship.
- Import permits are issued on a calendar year; permits for next year are issued since December 1 of the year which is previous to the year of action of permit.
- The RF and Belarus used the common automated information system ARGUS, and Kazakhstan used its own system. (It is necessary to register the system before using.)
  - Until the CU common electronic system was put in place, import permits would be issued by the CU Parties competent authorities, and were recognised by the other CU Parties as allowing importation of products into the CU territory.
- RF Service information:
  - Address: Orlikov alley, 1 / 11, Moscow 107139.
  - Service hours: Monday - Thursday from 09:00 to 18:00, Friday from 09:00 until 16:45. Lunch Break: 12:00 - 12:45.
  - Tel: +7 (495) 607-51-11, +7 (499) 975-43-47.
  - E-mail: info@svfk.mcx.ru.
  - Website: <http://www.fsvps.ru>
- Application for import permit must contain the following information:
  - Importer
    - Last name, first name and (if available) patronymic of an individual or the full name of legal person
  - Consignee of the RF, address, and TIN;
    - Last name, first name and (if available) patronymic of an individual or the full name of legal person
  - Exporter
    - Last name, first name and (if available) patronymic of an individual or the full name of legal person
  - Number of supervised product and its unit of measurement for each item;
  - Name of supervised product and its code (first 4 digits) of HS.
    - It is allowed to indicate several names of products referred to same HS subclass in one application;
  - Exporting country (one application for one exporting country);
  - Means of transport;
  - Checkpoints
    - In which the veterinary control is carried out, through which an entry into the RF is planned, place of customs clearance and the route (in case of import of supervised goods via transit through the CU Member state is specified),
    - It is allowed to specify several checkpoints in one application;
  - Purpose of entry (one application for one purpose):
    - for sale,
    - for processing,

- for storage;
  - Country of origin (one application for goods from one country of origin);
  - Name, number, administrative territory, the address of the manufacturer.
    - It is allowed to specify several manufacturers located in one country in one application;
- Following products are not required for permit registration:
  - Feed additives for dogs and cats, as well as fodder for cats and dogs which have had heat-treated (the temperature is not below +70 °C, for at least 20 minutes) in consumer packaging;
  - All kinds of stuffed animals and fish, or their fragments, the last complete taxidermy treatment, subject to the submission of documents confirming their purchase at retail;
  - Hunting trophies from regions free from diseases specified in paragraph 3 of the chapter 38 of the United veterinary-sanitary requirements to the goods subject to veterinary control, approved by the Decision of the CU Commission as of 18 June 2010 No. 317, as well as originating from regions with an unsafe situation in respect of mentioned diseases, but which have been processed in accordance with the rules adopted in the country of origin of trophies, which is confirmed by a veterinary certificate;
  - Finished products of animal origin in their original packaging, marked by the manufacturer, imported by individuals for personal use up to 5 kg per person, subject to being in the epizootic of the state of manufacture and export of the state of these products.
- "General Permit" which was issued based on a risk assessment for certain sectors in a particular country and allowed any importer to import any volume of the controlled goods from that country.

## Labelling

The primary RF legislation of labelling is "The General Requirements for Consumer Information Regarding Foodstuffs, GOST P 51074-2003". (GOST are non binding. The CU will soon adopt a TR on food labelling.)

- The label must contain following information in Russian:
  - General information
    - Name of the product (including the heat treatment of the product).
    - Percentage of fat (except ice cream and chocolate bars)
    - The class (if any);
    - Name, address, and establishment number of the manufacturer (including the organization authorized to accept claims from consumers in RF) (name of the company may be in English only);
    - Country of origin;
    - Trademark(if available);
    - Net weight or volume;
    - Ingredient statement;
    - Food additives, biologically active additives, flavourings, components of non-traditional composition;
    - Nutritional value (i.e. calories per gram):
      - List a recommended daily allowance in accordance with established procedures,

- Indicate if >2% of the recommended daily allowance of proteins, fats, carbohydrates, or calories is included in a 100-gram serving,
  - Indicate if a 100-gram serving contains >5% of the daily recommended allowance of minerals or vitamins,
  - May list the basic mineral substances and vitamins inherent in the product without indicating their quantity;
- Storage Conditions;
- Date of production and date of packing;
- Expiry date; storage period – for ice cream; implementation period - for the Vologda butter;
- Conditions of use;
- Information on conformity assessment.
- Additional information:
  - Content of lactic acid bacteria, bifidobacteria, probiotic cultures, or yeast (CFU in 1 g) - for products made from milk, dairy ingredients or raw materials of complex composition;
  - Preparation methods and conditions- for ready-to-eat milk and semi-concentrate;
  - Name of drug or bacterial concentrate – for cheese;
- 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 percent threshold for each biotech (GMM) component in food products for mandatory labelling.

  - “Product contains live genetically modified microorganisms” - for products containing viable GMM
  - “Product is obtained based on genetically modified microorganisms” - for products containing unviable GMM
  - “Product have 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 diet products, baby-food, and other special products shall meet special requirements stipulated for these products in relevant GOSTs and in SanPiN 2.3.2.1078-01.
- Feeds are not subject to labelling.
- According to the draft of TR of the EurAsEC on milk and dairy products, the packing of milk and dairy products shall contain the following information in Russian and, if necessary, in the official languages of the state-members of the Customs Union, in foreign languages:
  - Bulk package or transportation package
    - Product name (including the heat treatment, indication of domestic animals, except for cows, specific raw material composition, use of culture, non-dairy component, and bio product, for example, "curds with pieces of fruit", "fruit kefir", "processed cheese with ham" ., i.e. "milk pasteurized", "cream sterilized", "cultured milk drink ", " processed cheese with ham ", "biokefir").



- Name and address of manufacturer
- Trademark(if available)
- Net weight and gross weight
- Product shelf life
- Production Date
- Conditions of storage
- Net weight and volume
- Lot number
- Market circulation mark
  - EAC label shall be conducted before issuing the products for circulation at the CU territory.
  - EAC label shall attest its compliance with the requirements of all Technical regulations of the CU.
- Warnings and handling instructions, such as "Keep away from sun", "Temperature Limits", "Keep dry", "Perishables", shall be put selectively, if necessary
- Raw milk, raw skimmed milk, raw cream:
  - Product name
  - Identification indices
  - Name and address of manufacturer
  - Amount of products (in litres) and weight (in kilograms);
  - Date and time (hours, minutes) of shipment;
  - Temperature during shipment;
  - Lot number.
- Dairy products pre-packed into consumer
  - Products name;
  - Fat mass concentration in percentage:
    - In dry substances - for cheese, cheese products, processed cheese, processed cheese products;
    - In the fat phase - for milk-containing products;
  - Name and address of the manufacturer (including the organization authorized to accept claims from consumers in CU);
  - Trademark (if available);
  - Net and gross weight;
  - Ingredient statement: list in the order of decreasing the weight ratios of the ingredients.
  - Nutritional value: fat, proteins, carbohydrates in percentage or in grams for 100 grams of the product, energy value in calories or kilocalories;
  - Content of microorganisms (i.e. lactic acid microorganisms, bifidus bacteria and yeast): CFU in 1 g
  - Content of substances used for product enrichment: indicated the ratio and daily intake of these substances.
  - Storage conditions(including before opening)
  - Manufacturing date and packing date: indicated in two-digit numbers
  - Shelf life: indicated in two-digit numbers;
  - Instructions for consumption (if necessary);
  - market circulation mark;
    - EAC label shall be conducted before issuing the products for circulation at the CU territory.

- EAC label shall attest its compliance with the requirements of all Technical regulations of the CU.
- Additional information:
  - For dairy products contained in a milk complex product: names of food products, food additives, flavours, components of non-usual content.
  - For products with GMO components exceeds 0.9 %: information about genetically modified organisms (GMO) components.
  - For concentrated and dry milk derivatives: type of sugar and type of main starter population.
  - For cheese and cheese products: nature of origin of milk-clotting enzyme preparations.
  - For child nutrition products:
    - Recommendations for use.
    - Conditions of cooking (if necessary)
    - Indication of children age
    - Names of used vegetable oils and carbohydrates
    - Nutritional value: list vitamins, mineral substances and energy value in % of daily maintenance.
  - For adapted milk mixtures and follow-up mixtures: make the warning as "Breast milk is preferable for feeding babies".

### Hot Lines and Contact Point

The RF created a system of consultation hot-lines to guide foreign economic traders and businesses, information is posted on the official Russian Government website: <http://government.ru/docs/11253/>:

- Ministry of Economic Development for Russia: tel. +7-495-651-77-50 (Weekdays: from 9:00 AM to 9:00 PM; Saturdays - from 9:00 AM to 3 PM)
- Federal Custom Service for Russia: +7-495-740-18-18 (24 hours)
- Russian Federal Service for Consumer Rights Protection and Well-Being of Population (Rospotrebnadzor): 8-800-100-00-04 (Weekdays: from 10:00 AM to 5:00 PM)
- Russian Federal Service for Veterinary and Phytosanitary Surveillance - Rosselkhoz nadzor (VPSS): +7-915-022-14-17 (24 hours)
- Secretariat of the Customs Union Commission +7-495-604-40-38 (Weekdays: from 9:00 AM to 6:00 PM)
- Information pertaining to the Customs Union workings and documents reference: [www.tsouz.ru](http://www.tsouz.ru)
- The Russian Ministry of Economic Development: <http://www.economy.gov.ru/minec/activity/sections/>
- The Federal Customs Service of Russia: <http://www.customs.ru/ru/>
- Rospotrebnadzor: <http://www.rospotrebnadzor.ru/>
- The Federal Veterinary and Phytosanitary Surveillance Service: <http://www.fsvps.ru/fsvps>