inorms

TECHNICAL COMPLIANCE

PRACTICAL GUIDE · 2026 EDITION

# EAC Conformity for Food and Beverages

A comprehensive handbook for manufacturers, exporters and product managers



**FOOD · BEVERAGES · SPECIALISED NUTRITION**
**TESTING · DOCUMENTATION · CHECKLISTS**

As of 10 October 2026

ac-inorms.com

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# How to use this guide

From your food portfolio to appropriate assessment and shipment release.

This handbook is intended for food manufacturers, brand owners, exporters, importers and quality managers. It covers ordinary and specialised foods, supplements, animal products, beverages, water, additives and novel foods. It draws on the AC Inorms sector page, regulations archive and official legal sources. German and English editions share the same chapter structure.

## Distinguish four procedures clearly

TR CU 021/2011 generally provides for declaration, state registration of specialised or novel products and veterinary-sanitary examination. Certain manufacturing processes additionally require registration of production establishments. A general mandatory EAC certificate is not an optional alternative under this regulation. Food additives and food supplements have different functions and conformity routes.

Pages 4-13 explain classification and procedures. Pages 14-21 address dossier, formulation, samples, laboratory and manufacture. Product chapters follow on pages 22-32; labelling, packaging, import and maintenance on pages 33-40. The case study, FAQs and worksheets appear on pages 41-46; archive and sources on pages 47-49.

### Edition 1.0 · As of 10 October 2026

Current EEC amendment/transition information is considered. Alcohol regulation TR EAEU 047/2018 is presented with the effective date of 1 January 2026 established by No. 21/2025. Original texts and actual products take precedence; explanations are not official translations.

Sources: [1]-[10]

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### Suggested starting point

Prepare a product/formulation list. Add users, process, animal ingredients, packaging, shelf life and destination. Distinguish food additive, food supplement and ordinary fortified food.

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# Quick start: seven decisions

Product and use determine the route.

| Assessment area | Project implementation |
|---|---|
| 01 · Product | Food, additive, supplement or another type of goods? |
| 02 · Use | Ordinary, children’s, specialised, therapeutic or novel? |
| 03 · Animal content | Raw or processed; veterinary requirements? |
| 04 · Regulation | TR 021 / 022 and applicable sector rules. |
| 05 · Supply model | Resolve series/batch, applicant and destination. |
| 06 · Evidence | Assess formula, process, samples, reports and label. |
| 07 · Release | Agree register, marking, cold chain and import. |

The initial package includes quantitative composition, specification, process description, packaging data, label and existing reports. State manufacturer, factory, names, users, quantity, proposed customs code, storage conditions and shipment date. Share confidential formulations through the agreed channel. Classify products before confirming price and timing.

### In practice

First import does not automatically make ordinary food a novel food. Statutory characteristics such as new production principles or previously unused ingredients are decisive.

Sources: [3], [4]

FUNDAMENTALS

# The EAEU market

EAC provides a common conformity framework for five countries.

**One economic area - five member states**

EAEU / Eurasian Economic Union

| Armenia | Belarus | Kazakhstan | Kyrgyzstan | Russia |
|---|---|---|---|---|
| EAC | EAC | EAC | EAC | EAC |

Common product requirements; assess additional national operating obligations separately.

## What mutual recognition means

A properly issued and valid EAC document is generally usable in all five EAEU member states within its product scope. Common recognition concerns the relevant technical product requirements. Language obligations, national measuring instrument rules, plant operation and registrations with authorities may still apply separately.

## Understanding EAC, CE and GOST

| Term | Meaning for food exports |
|---|---|
| EAC | Conformity marking for compliance with all applicable TR CU / TR EAEU. It is applied only after the required assessment is complete. |
| CE | EU conformity marking. EU documentation can provide a technical starting point but does not replace a required EAC document. |
| GOST | Standards or national conformity systems. Whether a GOST test standard applies depends on the specific regulation and its standards list. |

Successful conformity assessment alone does not authorise an otherwise prohibited export. Foreign trade law and technical product conformity are separate assessments.

Sources: [3], [4]

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# Regulatory matrix for foods

General and specific requirements apply together.

| Assessment area | Project implementation |
|---|---|
| 021 / 022 | General safety / food labelling. |
| 015 / 023 / 024 | Grain / fruit and vegetable juices / oil and fat products. |
| 027 / 029 | Certain specialised foods / additives, flavourings and processing aids. |
| 033 / 034 | Milk and dairy / meat and meat products. |
| 040/2016 / 051/2021 | Fish / poultry meat and processed products. |
| 044/2017 / 047/2018 | Packaged drinking/mineral water / alcoholic products. |

TR 021 was adopted by Decision 880/2011 and TR 022 by 881/2011. Both generally apply from 1 July 2013, with product-specific introduction rules. A sector regulation may refine definitions, safety parameters, evidence form and schemes. The correct fish regulation is TR EAEU 040/2016. The archive provides access; confirm current versions and standards lists through the EEC.

### In practice

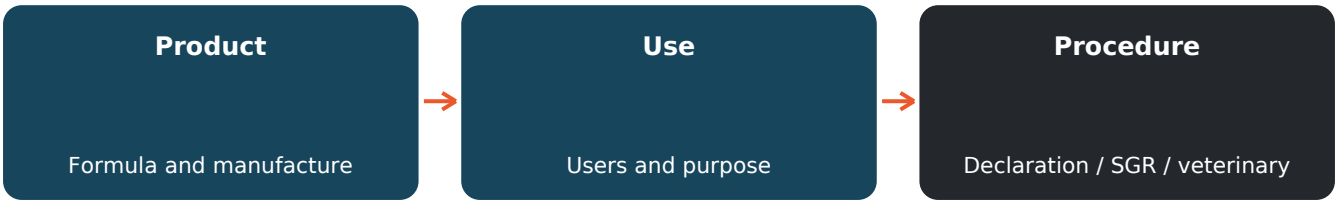
Distinguish HACCP-based procedures from voluntary ISO 22000/FSSC/BRCGS certificates. A quality certificate does not replace required product evidence.

Sources: [2]-[11]

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# Product identity and scope

Assess formula, process and sales purpose together.




**Product data determine the conformity route**

| Assessment area | Project implementation |
|---|---|
| Identity | Name, brand, item, formula version, manufacturer and factory. |
| Manufacture | Raw, pasteurised, sterilised, fermented, dried or otherwise processed. |
| Use | Ready to eat, preparation required, ingredient or technological function. |
| Users | General population, children or expressly specialised users. |
| Borderlines | Distinguish medicines, feed and other goods by function. |

A shared brand or similar taste does not establish legal equivalence. Assess every variant, including animal ingredients, additives and claims. TR 021 also governs associated processes. Non-industrial manufacture, certain catering products and privately produced goods not marketed commercially have specific boundaries; this is not a general export exemption for small manufacturers.

## In practice

The HS/TN VED code supports identification but does not replace review of formula, purpose and sector definitions.

Sources: [3], [4]

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# Which evidence is required?

Map product and process procedures separately.

**Ordinary foods**

Declaration · check exceptions

**Specialised / novel products**

SGR · product registration

**Unprocessed / animal origin**

Veterinary-sanitary examination

**Certain production processes**

Establishment registration / status

| Assessment area | Project implementation |
|---|---|
| Declaration | Generally for covered ordinary foods; assess exclusions and sector rules. |
| Product SGR | Specialised and legally novel foods. |
| Veterinary-sanitary examination | For unprocessed foods of animal origin. |
| Establishment registration | Certain processes involving animal raw materials; separate site assessment. |
| Further import checks | Veterinary, phytosanitary, licensing and trade conditions where applicable. |

Product SGR and establishment registration are different procedures. Not every dairy, meat or fish product therefore requires product SGR. Ordinary processed food may be declared while raw products undergo veterinary assessment. A voluntary GOST certificate can supplement evidence but does not replace mandatory documents or permit misleading marks.

## In practice

The baseline text of Article 23 expressly excludes vinegar from its declaration requirement. Assess the actual goods and other applicable rules separately; do not assume equivalence with all ordinary foods.

Sources: [3], [4]

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# Declaration schemes and evidence

Sector regulations can supplement the general schemes.

| Assessment area | Project implementation |
|---|---|
| 1d · Series | Technical dossier, production control and sample testing; own testing basis under TR 021. |
| 2d · Batch | Dossier and testing for a uniquely identified quantity. |
| 3d · Series | Dossier, production control and accredited sample testing. |
| Further schemes | Sector rules may provide e.g. 4d/6d; do not transfer universally. |
| Registration | Applicant adopts declaration; registration follows the competent procedure. |

Selection follows actual goods, series/batch model and special rules. Even own evidence must substantiate all relevant requirements. A datasheet without appropriate results is insufficient. An accredited certification body is not the sole registration route in every member state; follow national electronic procedures. Responsibility remains with the declarant.

### In practice

Assess a European laboratory report for method, accreditation, parameters and actual coverage. “EU compliant” does not establish automatic acceptance.

Sources: [3], [4], [11]-[13]

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# State registration of products

SGR is required for defined product categories.

| Assessment area | Project implementation |
|---|---|
| Children’s nutrition | Including drinking water expressly intended for children’s nutrition. |
| Specialised foods | Dietary therapeutic/preventive nutrition; athletes, pregnant/lactating women under the definitions. |
| Supplements | Biologically active food supplements; distinguish from food additives. |
| Certain mineral waters | Medicinal and medicinal-table natural mineral water under TR 044. |
| Novel foods | Separate statutory characteristics and safety dossier. |

State registration is performed by the authority designated by the member state. Laboratories, service providers and, where relevant, technical experts support preparation; they do not replace the authority’s decision. Complete the procedure before import of specialised food. Product name, formula, purpose, label and manufacturer must match registration coverage.

### In practice

“New in the portfolio”, “first shipment” or “new brand” alone does not establish novel-food status.

Sources: [3], [4], [8]

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# Veterinary assessment and establishment status

Animal products require an additional import review.

| Assessment area | Project implementation |
|---|---|
| Unprocessed | Veterinary-sanitary examination instead of an assumed food declaration. |
| Processed | Sector regulation/product evidence; further veterinary obligations can remain. |
| Production processes | Slaughter, raw milk collection/processing, eggs and certain aquatic organisms. |
| Foreign factory | Assess import eligibility, listing where required and competent veterinary authority. |
| Shipment | Origin, batch, veterinary accompanying records and temperature control. |

Article 32 describes registration of certain establishments/processes; it is not a list of products all requiring product SGR. Resolve veterinary/approval conditions separately for foreign establishments in the actual destination. An EAC document does not override import prohibitions, animal-disease measures or missing establishment eligibility.

### In practice

Resolve establishment/import status before commercial sample or goods shipment. For animal products this can determine the critical project path.

Sources: [3], [4]

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# Applicant and responsibilities

An eligible EAEU actor performs the prescribed role.

| Assessment area | Project implementation |
|---|---|
| Manufacturer | Ensure safe formula/process, HACCP, data, evidence and changes. |
| Applicant | Established EAEU manufacturer, seller or contractually eligible representative under the procedure. |
| Importer | Coordinate supply scope, import, label, storage and distribution. |
| Authority / laboratory | Registration decision or appropriate testing within competence. |
| Service provider | Support matrix, documentation, translations and procedure coordination. |

A manufacturer outside the EAEU does not meet applicant requirements solely through a supply contract. The mandate defines products, nonconformity responsibility, access to reports, changes, complaints and authority communication. Coordinate multiple importers with the selected document and its use. Exclusivity/report ownership are separate contractual issues.

### In practice

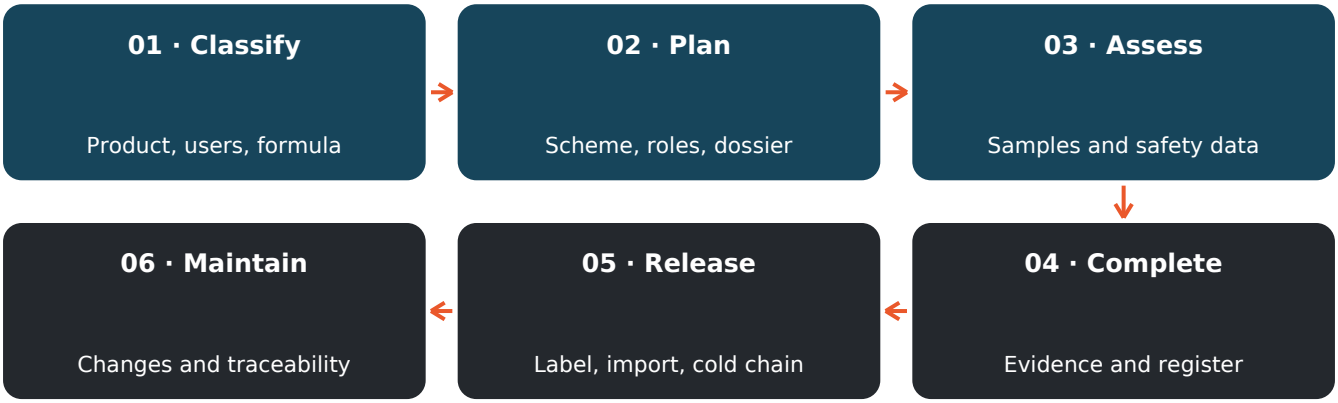
Plan a partner change with register access, complete evidence and document continuity. Do not transfer to a new applicant without assessment.

Sources: [3], [4]

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# Workflow from enquiry to shipment

Shipment release follows completed assessment.




| Assessment area | Project implementation |
|---|---|
| Classify | Resolve product, formula, users, conformity route and import eligibility. |
| Plan | Define applicant, scheme, dossier, samples and cost. |
| Assess | Suitable evidence, laboratory work and safety assessment. |
| Complete | Register declaration or complete SGR/veterinary procedure. |
| Release | Check register, label, packaging, shipping data and import. |
| Maintain | Production control, changes, dates and traceability. |

A negative result cannot be resolved simply by renaming the goods. Document cause analysis, affected formulations, correction and retesting. Labelling/EAC follow successful assessment and required registration. Plan sample shipments separately under actual import conditions; samples do not create a universal food exemption.

### In practice

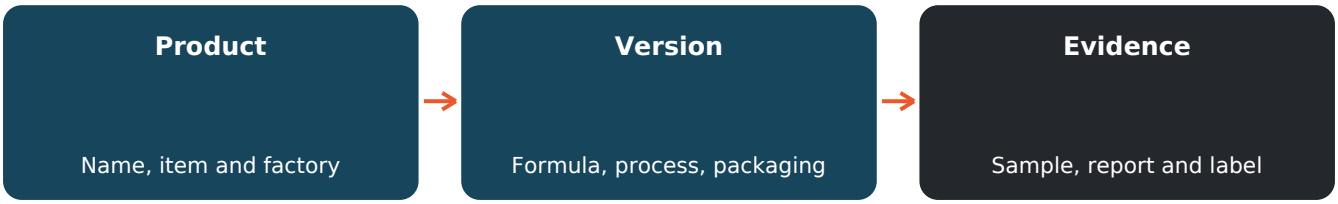
One central product file connects purchasing, manufacture, quality, sales and logistics to the same released version.

Sources: [3], [4]

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# The technical product dossier

One controlled product version connects all evidence.




**Link all records to the same product version**

| Assessment area | Project implementation |
|---|---|
| Product master | Name, item, manufacturer, factories, destinations and users. |
| Formula | Full quantities, ingredients, additives, flavourings and raw-material specifications. |
| Manufacture | Process flow, treatment, hygiene, HACCP and production control. |
| Specification | Sensory, relevant physicochemical and microbiological parameters. |
| Testing | Sampling record, reports, methods, shelf-life and safety evidence. |
| Packaging / label | Material, contact conditions, shelf life, storage and released languages. |

Add applicant/mandate records, supply contract for batches and existing foreign evidence. For SGR, additionally plan prescribed registration records and, where relevant, suitability/safety assessments. Record product/formula versions throughout. Do not silently link a previous formula's laboratory file to new goods.

### In practice

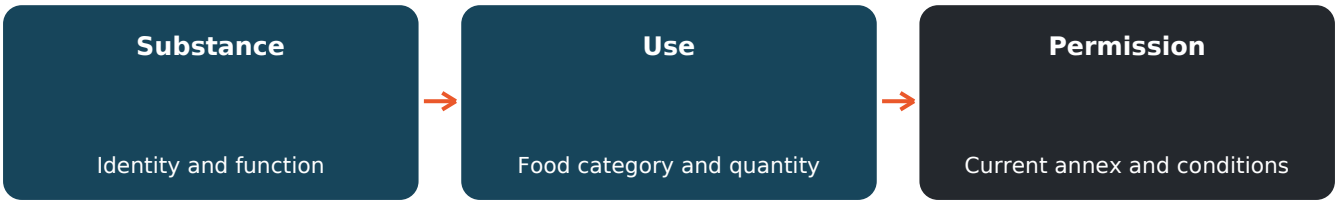
CE is not a general mandatory food document. EU marketability, HACCP or quality certificates can support the dossier but do not replace the EAEU procedure.

Sources: [3], [4]

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# Formula, additives and flavourings

Check permission for every intended use.




**An E number alone is not universal permission**

| Assessment area | Project implementation |
|---|---|
| Ingredient | Identity, origin, function, quantity and supplier. |
| Additive | Name/E number, food category and permitted conditions. |
| Flavour / carrier | Flavouring type, carriers, solvents and relevant restrictions. |
| Quantity review | Direct use and contribution through compound ingredients. |
| Users | Special restrictions for children’s/specialised nutrition. |

TR 029/2012 covers additives, flavourings and processing aids. An E number does not establish universal permission. Assess current annex, food category, use level and any carry-over rule together. Label ingredient information may be insufficient for compound ingredients; suppliers must provide required detail. Control access to confidential quantitative formulations.

## In practice

Food additives perform a technological function. Food supplements supplement nutrition and require a separate SGR assessment.

Sources: [3], [4], [7]

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# Test samples and sampling

Sample identity and cold conditions form part of evidence.

| Assessment area | Project implementation |
|---|---|
| Selection | Formula, process, packaging, batch and representative variant. |
| Quantity | All analyses, retained samples and possible repeat needs. |
| Identification | Sampling record, date, factory, lot, photos and sealing. |
| Transport | Temperature, time, hygiene, packaging and laboratory acceptance. |
| Shelf life | Sufficient remaining life for testing, conditioning and shipment. |

Plan sampling under suitable standards and laboratory instructions. Samples must match the marketed product. Damaged packaging, undocumented cold-chain interruption or unrepresentative formulation can weaken evidence. Additionally assess veterinary import conditions for animal samples. The EEC lists a specific sampling recommendation on its TR 021 page.

### In practice

Agree sample receipt and analyses before shipping. “No commercial value” does not replace appropriate import documentation.

Sources: [3], [4]

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# Laboratory, methods and reports

One universal test for every food is technically unsuitable.

| Assessment area | Project implementation |
|---|---|
| Competence | Accreditation and permitted testing basis of the chosen scheme. |
| Methods | Current standards list, product matrix, measurement range and assessment. |
| Identity | Sample, formula, batch, manufacturer and packaging identified. |
| Report | Parameters, results, units, conditions and relevant limits. |
| Applicability | Justifiably map variants, processes and factories. |

The programme follows food category, formula, origin, process and users. Accredited microbiological testing alone does not establish chemical safety or shelf life. Compare EU reports against methods/requirements. For TR 021, the EEC lists No. 236/2019 with later changes including No. 70/2025; use the current version appropriate at the testing date.

### In practice

Request a parameter-specific plan with cost, samples and timing. One generic “passed” statement is insufficient for a complete review.

Sources: [3], [4]

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# Microbiology and contaminants

Limits depend on food category and users.

| Assessment area | Project implementation |
|---|---|
| Microbiology | Relevant indicator organisms/pathogens under the product table. |
| Chemical burden | Toxic elements, mycotoxins, pesticides and further relevant parameters. |
| Animal products | Medicine residues and product-specific veterinary requirements. |
| Processing | Process-related contaminants and safe treatment. |
| Specialised foods | Additional, potentially stricter safety requirements. |

TR 021 annexes and sector rules contain differentiated parameters and reference bases. Establish category, investigation unit and method for the actual food. Universal Salmonella, metal or mycotoxin limits for every product would be incorrect. Raw-material testing, supplier control and finished-product assessment complement one another. Document unsafe results with cause, batch and correction.

### In practice

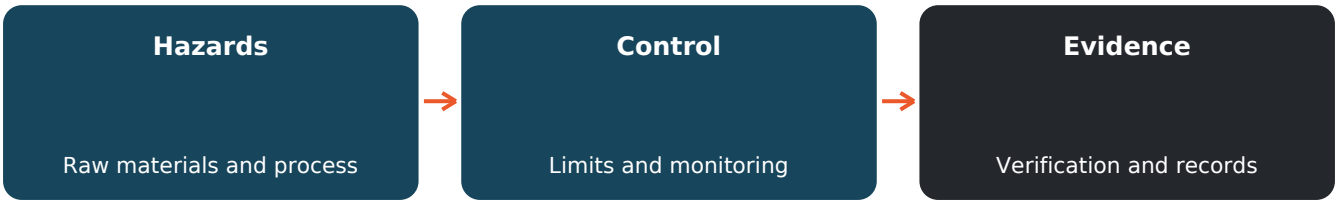
The testing plan includes all relevant risks, not only readily available or inexpensive analyses.

Sources: [3], [4]

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# HACCP and production control

Safe manufacture is a continuing obligation.




**Effective implementation goes beyond a certificate**

| Assessment area | Project implementation |
|---|---|
| Hazard analysis | Identify biological, chemical and physical process risks. |
| Control | Critical points, limits, monitoring and corrections. |
| Hygiene | Personnel, water, cleaning, pests and cross-contamination. |
| Verification | Review measure effectiveness and process changes. |
| Records | Responsibilities, records, deviations and release. |

Article 10 requires manufacturing procedures based on HACCP principles. An external HACCP/ISO certificate is not equivalent to effective implementation. Raw-material reception, water quality, personnel hygiene, cleaning and safe storage must match the actual process. For contract manufacture, coordinate manufacturer, brand owner and applicant according to responsibilities and the actual factory.

### In practice

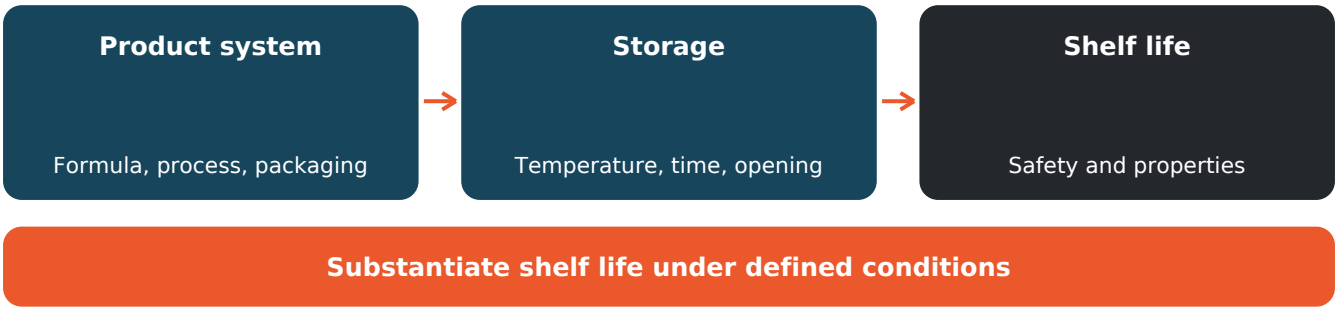
A positive finished-product sample does not replace stable process control. Assess treatment, cooling or cleaning changes before series release.

Sources: [3], [4]

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# Shelf life and storage conditions

Declared shelf life needs a sound basis.




| Assessment area | Project implementation |
|---|---|
| Product system | Formula, process, packaging, closure and filling. |
| Conditions | Temperature, humidity, light and opened packaging. |
| Investigations | Safety, sensory quality and relevant changes during storage. |
| Transport | Temperature profile, duration and realistic distribution conditions. |
| Label | Date, shelf life and required conditions under TR 022. |

The manufacturer substantiates shelf life under defined conditions. Neither an EAC document nor one favourable analysis automatically establishes shelf life. Conditions after opening may differ. A different container/closure or fewer preserving ingredients can change storage stability. The date format follows shelf-life duration and sector-specific requirements.

### In practice

Define storage-study coverage clearly. Do not transfer previous-formula data to a new formula without assessment.

Sources: [3]-[6]

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# Traceability and cold chain

Mapping must work from raw materials to the customer.




| Assessment area | Project implementation |
|---|---|
| Raw material | Supplier, specification, batch and incoming checks. |
| Manufacture | Formula version, factory, treatment, production lot and release. |
| Packaging | Material batch, filling, lot marking and label version. |
| Shipment | Recipient, quantity, date and required temperature records. |
| Complaint | Affected batches, hold, risk assessment and measures. |

Food must be traceable through appropriate accompanying information. A batch number without linked production/shipping records is practically insufficient. Coordinate chilled/frozen products' temperature control from filling to import warehouse. Assess deviations by product/risk; lowering temperature afterwards does not automatically restore an unsafe batch.

### In practice

Maintain a procedure for hold, withdrawal and required authority communication. Define who can contact the importer outside working hours.

Sources: [3], [4]

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# Ordinary processed foods

Declaration is the typical product document.

| Assessment area | Project implementation |
|---|---|
| Examples | Bakery goods, confectionery, sauces, canned foods and other covered products. |
| Classification | Animal ingredients, composition, process and purpose. |
| Testing | Product-specific microbiology, contaminants and specification. |
| Labelling | Ingredients, allergy/intolerance components, quantity and storage. |
| Variants | Record formula, filling, process and packaging changes. |

TR 021/022 are the starting point for ordinary covered foods; a sector regulation may additionally apply. A family product does not require SGR solely because children consume it if it is not legally children’s nutrition. Conversely, goods expressly intended for infants or specialised nutrition cannot be treated as ordinary foods. Align names/claims with classification.

### In practice

A combined declaration requires justified coverage. A brand with many different formulations is not an automatically homogeneous portfolio.

Sources: [3], [4]

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# Grain, pulses and spices

Actual goods determine sector allocation.

| Assessment area | Project implementation |
|---|---|
| Grain | TR 015/2011 according to scope and use. |
| Processed goods | Do not classify flour, baked products or mixes solely as raw grain. |
| Safety risks | Mycotoxins, pesticides, contaminants and relevant microbiology. |
| Plant health | Assess control list, origin and shipment records where applicable. |
| Storage | Moisture, pests, packaging and traceability. |

Assess spice blends from their formula, including salt, additives and carriers. Grain assessment depends on intended use, raw state and processing. Phytosanitary import conditions may apply alongside technical evidence. A declaration does not replace a required phytosanitary certificate. Derive the laboratory programme from origin and category.

### In practice

Retain batch-specific supplier/origin data; changing harvests or supply regions can affect the testing plan.

Sources: [3], [4], [11]

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# Milk and dairy products

TR 033/2013 refines safety and product definitions.

| Assessment area | Project implementation |
|---|---|
| Raw milk | Veterinary assessment and establishment requirements. |
| Processed | Ordinary dairy generally requires declaration; assess the precise subgroup. |
| Specialised | Assess children’s nutrition and other specialised products for SGR. |
| Identity | Milk content, fat, fermentation, heat treatment and non-milk fats. |
| Supply chain | Temperature, shelf life, origin and veterinary records. |

The designation follows actual composition and sector definitions. A plant-based alternative is not automatically dairy under TR 033. Assess milk content/category for composite goods. Product SGR, establishment registration and veterinary evidence are different procedures; do not require all of them universally for every dairy product.

### In practice

Statements on fat content, category, heat treatment and storage must match formula, process and report.

Sources: [3], [4], [11]

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# Meat and meat products

Distinguish raw goods, processing and children’s nutrition.

| Assessment area | Project implementation |
|---|---|
| Regulation | TR 034/2013 for covered meat goods; assess poultry separately. |
| Raw product | Veterinary-sanitary examination and import conditions. |
| Processing | Declaration for ordinary covered processed products. |
| Special purpose | Assess children’s/specialised food for registration. |
| Safety | Microbiology, residues, process, temperature and origin. |

Record species, proportion, tissue type, ingredients, treatment and packaging state. Raw meat classification differs from sausage or sterilised ready meals. Veterinary eligibility of country/factory can be decisive independently of EAC evidence. The matrix identifies each item’s product document and additional shipment records.

### In practice

Meat content alone does not require product registration. Purpose and sector rules govern.

Sources: [3], [4], [11]

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# Poultry and poultry products

Address TR EAEU 051/2021 separately.

| Assessment area | Project implementation |
|---|---|
| Scope | Poultry meat and covered processed products. |
| State | Raw, chilled, frozen, prepared or processed. |
| Evidence | Veterinary assessment, declaration or special registration by goods. |
| Data | Species, cuts, composition, treatment and storage. |
| Further checks | Factory, origin, shipment records and actual import eligibility. |

Do not infer coverage from a general meat declaration. Check the current poultry regulation, transitions and standards lists on the EEC page. Assess eggs/egg products by actual supply object and general/other applicable rules; they do not automatically fall within every poultry-meat declaration.

### In practice

For mixed meat recipes, document species/proportion of every animal component. Establish correct sector allocation before sampling.

Sources: [3], [4], [11]

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# Fish and aquatic products

The applicable regulation is TR EAEU 040/2016.

| Assessment area | Project implementation |
|---|---|
| Identity | Species, catch/aquaculture, processing and supply state. |
| Raw / processed | Veterinary-sanitary examination or prescribed product document. |
| Safety | Microbiology, parasites and chemical burden by product. |
| Labelling | Product designation, state, relevant ingredients and storage. |
| Cold chain | Frozen/chilled conditions, transport and arrival checks. |

Canned goods, smoked products, raw fillets and specialised fish foods need different assessment approaches. A declared canned item does not cover an arbitrary raw-fish portfolio. Document species/origin traceably. Individual goods may require animal-health/shipment records. Assess registration separately for children’s or novel products.

### In practice

Packaging/temperature control must match actual goods; a laboratory report does not replace missing cold-chain evidence.

Sources: [3], [4], [11]

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# Juices and non-alcoholic drinks

Composition and designation determine sector relevance.

| Assessment area | Project implementation |
|---|---|
| Juices / nectars | TR 023/2011 by definition and composition. |
| Other drinks | TR 021/022, additive rules and applicable special requirements. |
| Identity | Fruit/vegetable content, concentrate, sugar, sweetener and carbonation. |
| Tonic / energy | Assess specific composition and warning requirements. |
| Shelf life | Filling, treatment, closure and storage after opening. |

A fruit-containing drink is not automatically juice. Compare the name against sector definitions. Children’s drinks may require registration and further conditions. Assess caffeine, plant extracts and sweeteners against actual conditions. Claims such as “no added sugar” or “source of vitamins” need suitable formula/nutrition data and TR 022 criteria.

### In practice

Safety testing, nutrition calculation and claim substantiation are separate dossier tasks.

Sources: [3]-[7], [11]

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# Drinking water and mineral water

TR EAEU 044/2017 covers packaged water.

| Assessment area | Project implementation |
|---|---|
| Ordinary water | Prescribed declaration for the applicable water group. |
| Special groups | Assess children’s water and medicinal/medicinal-table water for SGR. |
| Source / treatment | Origin, abstraction, natural composition and permitted treatment. |
| Testing | Microbiology and water-specific chemical/further safety parameters. |
| Labelling | Water category, prescribed information and appropriate use. |

Not every mineral water requires SGR. Category and intended use are decisive. This guide does not use “1 mg/dm³” as a universal selection threshold; current TR 044 definitions/provisions govern. Changing source, treatment or composition can trigger reassessment.

### In practice

Resolve age relevance, suitability and special marking for children’s water before label printing.

Sources: [3], [4], [8]

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# Oils, fats and food additives

Assess two different product groups separately.

| Assessment area | Project implementation |
|---|---|
| Oils / fat products | TR 024/2011 by category, composition and processing. |
| Quality / safety | Relevant identity, oxidation and safety parameters. |
| Additives / flavours | TR 029/2012 and substance/use-specific annexes. |
| Processing aids | Function, remaining residues and use conditions. |
| Boundary | Food supplements are not merely technological additives. |

Classify oil, margarine and composite fat products by actual supply object. Additives do not universally require an EAC certificate. Their procedure follows applicable food/additive rules. Assess new uses/mixes by substance and food category; supplier evidence for one substance does not automatically cover the finished product.

### In practice

Define clear specifications/use conditions, especially for concentrated ingredients supplied to further processors.

Sources: [3], [4], [7], [11]

PRACTICAL GUIDE

# Children’s foods, special nutrition and supplements

SGR is central to covered specialised foods.

| Assessment area | Project implementation |
|---|---|
| Children’s nutrition | Age, consumption form, formula and special safety. |
| Dietary nutrition | Therapeutic/preventive use under TR 027/2012. |
| Athletes / pregnancy | Actual users, intake, warnings and suitability. |
| Supplements | Constituents, daily portion, dosing and claims. |
| Medicinal boundary | Assess composition, effects and therapeutic claims. |

TR 027 applies to its defined specialised foods, not universally to every supplement. Food registration is not medicinal approval. Dosing/claims must not contradict classification. For children/special users, substances or levels may be prohibited despite different treatment in ordinary foods. Release label and safety dossier together.

### In practice

SGR records relate to the actual formula, use and manufacturer. Assess new constituents/doses before marketing.

Sources: [3], [4], [11]

PRACTICAL GUIDE

# Novel foods, alcohol and tobacco

Do not conflate different regulatory areas.

| Assessment area | Project implementation |
|---|---|
| Novel foods | Assess statutory TR 021 criteria; SGR and safety dossier. |
| First shipment | Does not alone establish novel-food status. |
| Alcohol | TR 047/2018 effective 1 January 2026 under No. 21/2025; assess transitions. |
| National alcohol rules | Assess licensing, excise and special digital marking separately. |
| Tobacco | Not food; separate TR 035/2014 regime. |

For alcohol, use the current regulation including national distribution conditions. Do not reuse obsolete commencement dates. A food handbook does not replace a separate tobacco assessment. Novel foods need a substantiated safety basis; a familiar EU ingredient can still need separate assessment under EAEU definitions. Determine classification from identity, use and production principle.

### In practice

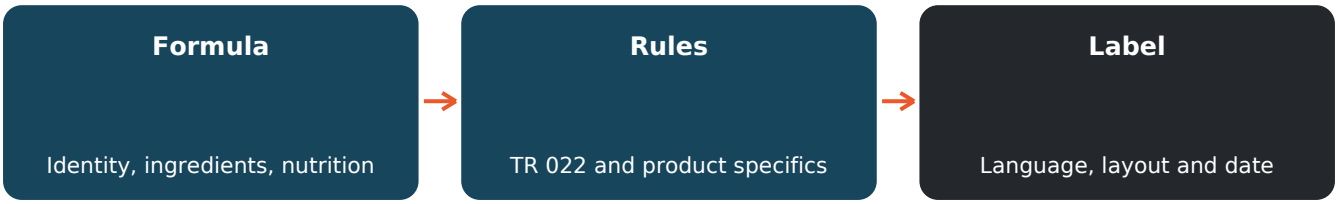
Do not imply that SGR/EAC universally replaces licensing, tax or import conditions.

Sources: [3], [4], [9]-[11]

PRACTICAL GUIDE

# Consumer label under TR 022

Derive mandatory information from product and supply form.




**Label and technical dossier must agree**

| Assessment area | Project implementation |
|---|---|
| Name / ingredients | Appropriate designation/composition under labelling rules. |
| Quantity / dates | Net quantity, manufacture date and shelf life in the appropriate format. |
| Storage / use | Storage conditions; after opening/preparation where required. |
| Responsible actor | Manufacturer and required representative/importer information. |
| Further details | Nutrition, GMO, special warnings and EAC as applicable. |

Label in Russian and additionally in the state language where national law requires. Names, numbers, units, printed dates and storage conditions must be readable/understandable. TR 022 contains exceptions/special rules, for example for certain ingredient/nutrition information; assess them by product. Simply translating an EU label template is insufficient.

## In practice

Release the actual layout, not only a text list. Include print size, contrast, date field and actual packaging surface.

Sources: [5], [6]

PRACTICAL GUIDE

# Ingredients, allergens and warnings

The list follows the formula and specific information rules.

| Assessment area | Project implementation |
|---|---|
| Order | Ingredients generally by decreasing quantity; assess exceptions. |
| Compound ingredients | Record constituents and individual components requiring declaration. |
| Risk components | TR 022 list of components relevant to allergy/intolerance. |
| Cross-contact | Declare possible unintended presence based on actual risks. |
| Special warnings | For example aspartame/phenylalanine source and certain colourings. |

TR 022 lists, among others, gluten cereals, milk including lactose, eggs, fish, crustaceans, molluscs, peanuts, nuts, soy, celery, mustard, sesame and lupin. Sulphur dioxide/sulphites have the stated quantity criterion. Compare the complete list/exceptions with the formula. EU-style bold formatting alone does not establish EAEU compliance. “May contain” does not replace appropriate hygiene/cross-contamination control.

### In practice

Label review also considers allergens in carriers, flavourings and compound raw materials.

Sources: [5], [6]

PRACTICAL GUIDE

# Nutrition, GMO and claims

Safety evidence and claim substantiation serve different purposes.

| Assessment area | Project implementation |
|---|---|
| Nutrition | Energy, protein, fat, carbohydrates and further required details. |
| Reference basis | Per 100 g/100 ml or permitted portion with appropriate units. |
| Data basis | Ingredient calculation or appropriate analysis; consider processing/rounding. |
| GMO | Origin/actual use under specific information requirements. |
| Claims | Assess “source”, “free”, “reduced” and other statements against TR 022. |

Formula, nutrition table and claims must agree. Nutrition exemptions may apply. Do not infer GMO information solely from an EU non-GMO statement; actual raw materials/EAEU conditions govern. “Natural”, “organic”, “gluten-free” and health statements need an appropriate basis and further review where applicable. Registered evidence does not permit arbitrary therapeutic promises.

### In practice

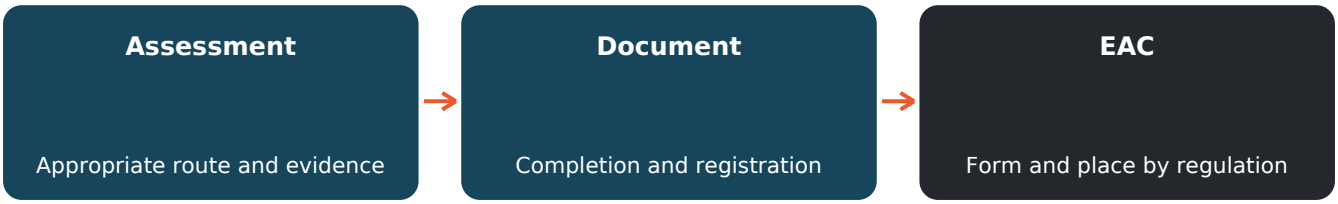
Review label, datasheet and online description together to maintain consistent intended use.

Sources: [5], [6]

PRACTICAL GUIDE

# Packaging, transport label and EAC

Food and contact materials form a coordinated system.




**Process diagram · not an official EAC print template**

| Assessment area | Project implementation |
|---|---|
| Contact material | Suitability for contents, time, temperature and relevant migration. |
| Packaging rules | TR 005/2011 by supply object; TR 022 governs labelling. |
| Transport marking | Name, quantity, date, shelf life, storage and identity under the rules. |
| EAC | After completed mandatory procedure; placement/records under applicable rules. |
| Graphic form | Prescribed proportions, monochrome, contrast, basic size at least 5 mm. |

Consumer and transport packaging serve different information purposes. There is no assumed universal duty to print an “import ban” on every transport label. A sticker must be securely attached/durably readable. Assess specific rules for unpackaged goods and special supply forms. EAC does not replace ingredient, shelf-life or storage information.

## In practice

A packaging change can affect contact migration, shelf life and marking. Assess it before use in released products.

Sources: [3]-[6], [11], [14]

PRACTICAL GUIDE

# Registers, customs and import release

Review product evidence and import eligibility together.

| Assessment area | Project implementation |
|---|---|
| Register | Number, validity, suspension, applicant and product coverage. |
| Shipping data | Item, batch, quantity, invoice, packing list and TN VED code. |
| Sanitary / veterinary | Product/establishment conditions and shipment-specific records. |
| Plant health | Applicable goods lists and required certificates. |
| Trade review | Current import/export prohibitions, licences, sanctions and payment conditions. |

EAC evidence is not an export authorisation and does not override national import restrictions. Use competent registers for applicant state/evidence type. Reconcile SGR entries with formula, names and manufacturer. Hold shipment release pending resolution of missing/conflicting entries. Current EU trade conditions are an additional check.

### In practice

The release file includes evidence/annexes, register check, batch mapping, label and required shipping records.

Sources: [3], [4], [12], [15]

PRACTICAL GUIDE

# Validity, archive and existing goods

One universal five-year validity would be incorrect for foods.

| Assessment area | Project implementation |
|---|---|
| Declaration | TR 021 lets the applicant set validity unless sector rules provide otherwise. |
| Sector-specific | Assess scheme, product and specific maximum periods. |
| SGR | Articles 24/27 generally provide indefinite registration; review status/coverage. |
| Batch | Only identified quantity; no automatic series release. |
| Archive | Maintain traceable application, evidence, formulas, reports, register and batches. |

Food shelf life and document validity are different periods. Indefinite SGR means neither unlimited shelf life nor permission for arbitrary formula changes. Previous registration does not cure an expired, suspended or unsuitable document. Confirm specific retention and existing-goods treatment by regulation, transition and national procedure.

### In practice

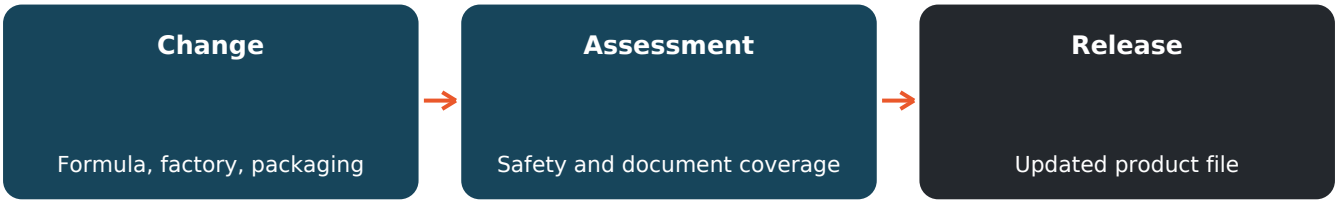
Record document expiry, next assessment, shelf life and retention end separately. Responsibilities remain traceable after distribution.

Sources: [3], [4]

PRACTICAL GUIDE

# Changes, complaints and withdrawal

Approval must match actual goods.




**Assess the new version before the next shipment**

| Assessment area | Project implementation |
|---|---|
| Formula | Assess new ingredient, quantity, flavour or daily portion against safety/coverage. |
| Process / factory | Assess treatment, site, supplier or hygiene-plan changes. |
| Packaging / storage | Update migration, shelf life, temperature and label. |
| Name / users | Reassess identity/conformity route. |
| Complaint | Hold batch, assess risk, establish measures/communication. |

Agree changes with the applicant and responsible body/authority before the next shipment. An unchanged brand does not establish unchanged safety. Safety complaints require batch investigation and, where necessary, withdrawal, recall or authority notification. Update dossier/production control and evidence where needed; assess reapplication by product.

### In practice

A change procedure names triggers, decision makers, release criteria and document versions.

Sources: [3], [4]

PRACTICAL GUIDE

# Timing, costs and project planning

A reliable quotation requires clear product data.

| Assessment area | Project implementation |
|---|---|
| Classification | Categories, formulas, SGR, veterinary/establishment conditions. |
| Dossier | Data quality, translation, label and existing evidence. |
| Lab / samples | Analyses, temperature-controlled transport, quantity and remaining shelf life. |
| Procedure | Registration authority, applicant and possible further assessment. |
| Maintenance | Changes, follow-up tests, register status and ongoing documentation. |

AC Inorms indicates approximately 10 to 15 working days for many cases. This is not a guaranteed end-to-end schedule and is not universally applied to SGR or veterinary establishment approval. Missing data, laboratory capacity, transport, shelf life and authority queries can change timing. Calculate cost by product/procedure; this guide does not invent a universal fixed price.

### In practice

Agree schedule start, included tests, sample shipment, translations, representation, registration and possible follow-up costs in writing.

Sources: [1], [3], [4]

PRACTICAL GUIDE

# Case study: four food categories

Planning example, not an advance approval decision.

| Assessment area | Project implementation |
|---|---|
| Spice blend | Ordinary food; declaration by product/scheme. |
| Sports supplement | Specialised nutrition; assess SGR, dosing and claims. |
| Raw fish fillet | Veterinary assessment, establishment/import status and cold chain. |
| Children’s drinking water | SGR and water regulation; age, source and suitability. |

1. The manufacturer separates four groups in an item matrix.
2. Document formulas, processes, factories and destination.
3. Confirm applicant/authority competence for each procedure.
4. Plan laboratory work/sampling separately for every group.
5. After successful assessment, complete registration/register checks.
6. Release label, storage, packaging and shipment records before shipping.

### In practice

Assess a new supplement sweetener before use. Unchanged brand/packaging does not prove coverage by existing SGR.

Sources: [3], [4], [7], [8]

PRACTICAL GUIDE

# Common mistakes and prevention

A consistent product file prevents avoidable queries.

| Mistake | Better implementation |
|---|---|
| Treat every food as certificate-required | Distinguish declaration, SGR, veterinary/establishment procedures. |
| Classify first import as novel | Assess statutory product characteristics. |
| Equate additive and supplement | Separate technological function from nutrition purpose. |
| Require SGR for all animal products | Assess raw state, processing and specialised purpose. |
| Only translate the EU label | Fully assess TR 022 and sector requirements. |
| Confuse SGR and establishment registration | Map product/process separately. |
| Assume universal five-year validity | Compare general/sector regulations. |
| Apply EAC before completion | Complete assessment/registration. |
| Ignore packaging change | Assess migration, shelf life and label. |
| Check only the PDF copy | Review register, annexes and actual goods. |
| Treat EAC as import permission | Separately assess veterinary, licensing and trade conditions. |

### Use clear release criteria

Do not ship with unresolved safety issues. Product identity, evidence, document, marking and import must agree.

Sources: [3]-[15]

PRACTICAL GUIDE

# Answers to frequently asked questions

Actual goods determine the procedure.

## Does every food need an EAC certificate?

No. TR 021 chiefly provides for declaration, SGR and veterinary-sanitary examination. A general certificate does not replace these procedures.

## Does a new brand require state registration?

Not solely because of its name or first import. Assess specialised and legally novel products separately.

## Does every mineral water require SGR?

No. The TR 044 water category is decisive. Children’s and certain medicinal mineral waters differ from ordinary water.

## Are all documents valid for five years?

No. Validity varies by regulation/scheme; SGR is generally indefinite under the stated TR 021 provisions but remains status/product-specific.

## Can voluntary GOST evidence help?

It can supplement evidence but does not replace mandatory documents or permit misleading marking.

## Is EAC sufficient for import?

Not automatically. Additionally assess veterinary, plant-health, establishment, licensing and trade requirements by actual goods/destination.

Sources: [3], [4], [8], [11]-[15]

PRACTICAL GUIDE

# Pre-shipment release checklist

Print as a worksheet and add responsibilities.

| Area | Check | Status |
|---|---|---|
| Classification | Product, users and evidence form resolved. | open |
| Coverage | Items, formulas, brands and factories mapped. | open |
| Regulations | General/sector rules confirmed. | open |
| Applicant | EAEU eligibility and mandate checked. | open |
| Dossier | Composition, process and specification complete. | open |
| HACCP | Production control/hygiene effectively documented. | open |
| Samples | Identity, sampling and transport traceable. | open |
| Testing | Relevant safety requirements assessed. | open |
| Shelf life | Storage/transport conditions substantiated. | open |
| Label | Ingredients, warnings, nutrition and language checked. | open |
| Packaging | Contact material and EAC placement released. | open |
| Evidence | Registration, register status and coverage checked. | open |
| Establishment / vet | Factory, origin and certificates resolved where required. | open |
| Import / export | Current trade/import conditions checked. | open |
| Logistics | Batch, invoice, TN VED and cold chain agree. | open |
| Maintenance | Changes, withdrawal, dates and archive planned. | open |

Project: _____ Release date: _____
Responsible person: _____ Signature: _____

Sources: [3]-[15]

PRACTICAL GUIDE

# Food project enquiry form

Send with item list, formulas and current labels.

| Information | Your details |
|---|---|
| Company / contact | _____ |
| Manufacturer / factories | _____ |
| Destinations / importer | _____ |
| Products / brands / items | _____ |
| Purpose / users / age | _____ |
| Series / batch / quantity | _____ |
| Formulas / quantities / revision | _____ |
| Additives / flavourings | _____ |
| Animal ingredients / origin | _____ |
| Process / treatment / HACCP | _____ |
| Packaging / contact material | _____ |
| Shelf life / storage | _____ |
| Proposed HS / TN VED | _____ |
| Reports / existing evidence | _____ |
| Labels / languages / claims | _____ |
| Target date / requested service | _____ |

## Useful attachments

Formula/variant matrix, specifications, process flow, packaging data, reports, labels and existing evidence. Send confidential information through the agreed channel.

PRACTICAL GUIDE

# Product matrix and release record

Every supply item needs traceable mapping.

| Example | Classification | Planning approach |
|---|---|---|
| L-01 · Spice blend | Ordinary processed goods | Confirm declaration/scheme. |
| L-02 · Sports supplement | Specialised nutrition | SGR and dose/claim assessment. |
| L-03 · Raw fish fillet | Unprocessed / animal origin | Veterinary, establishment/import review. |
| L-04 · Children’s water | Specialised water category | SGR and TR 044. |

Examples illustrate project structure only. For actual items add formula/process revision, manufacturer/factory, users, packaging, shelf life, storage, additional regulations, samples, reports, document number, register status, label version, batch, shipping data and responsible person. Keep unassessed items on hold pending resolution.

## Release record

Project / order: _____
Released items / formula versions: _____
Documents / register checked on: _____
Label / packaging / storage: _____
Veterinary / import records: _____
Open issues / limitations: _____
Shipment released on / by: _____

### One shared data basis

Purchasing, production, quality, sales and shipping use the same released matrix. Date, explain and technically assess every change.

Sources: [3], [4]

PRACTICAL GUIDE

# Regulations archive and terminology

Archive links and official additions for your product matrix.

| Regulation | AC Inorms archive |
|---|---|
| 021/2011 | General safety |
| 022/2011 | Labelling |
| 015/2011 | Grain |
| 023/2011 | Fruit/vegetable juices |
| 024/2011 | Oils/fats |
| 027/2012 | Certain specialised nutrition |
| 029/2012 | Additives/flavourings/processing aids |
| 033/2013 | Milk/dairy |
| 034/2013 | Meat/meat products |

Additionally: TR 040/2016 · Fish · TR 051/2021 · Poultry · TR 044/2017 · Water · TR 047/2018 · Alcohol. Assess entries by actual product; they do not universally apply cumulatively.

| Term | Meaning |
|---|---|
| EAC / EAEU | Conformity mark / Eurasian Economic Union. |
| SGR | State registration of a covered product. |
| HACCP | Hazard analysis/procedures with critical control points. |
| GOST | State/interstate standard; not a universal approval replacement. |
| Series / batch | Continuing production / identified quantity. |

Sources: [2], [3], [8]-[11]

PRACTICAL GUIDE

# Sources and legal foundations · 1

Assess official original texts together with current amendments.

**[1] AC Inorms · foods and beverages**
https://ac-inorms.com/eac-zertifikat-fuer-lebemsmittel

**[2] AC Inorms · regulations archive**
https://ac-inorms.com/richtlinien-ac-inorms-gmbh

**[3] EEC · TR 021/2011, amendments and standards lists**
https://eec.eaeunion.org/comission/department/deptexreg/tr/PischevayaProd.php

**[4] TR 021/2011 · official baseline text; read with amendments**
https://eec.eaeunion.org/upload/medialibrary/6ad/TR-TS-PishevayaProd.pdf

**[5] EEC · TR 022/2011, labelling and amendments**
https://eec.eaeunion.org/comission/department/deptexreg/tr/PischevkaMarkirovka.php

**[6] TR 022/2011 · official baseline text; read with amendments**
https://eec.eaeunion.org/upload/medialibrary/9db/TrTsPishevkaMarkirovka.pdf

**[7] EEC · TR 029/2012, additives and amendments**
https://eec.eaeunion.org/comission/department/deptexreg/tr/bezopPischDobavok.php

**[8] EEC · TR 044/2017, packaged water**
https://eec.eaeunion.org/comission/department/deptexreg/tr/tr_EAEU_044-2017.php

Accessed and reviewed on 10 October 2026. Footnotes refer to these numbered sources. Read baseline PDFs with amendments listed on the EEC pages. Source 3 lists, among others, No. 35/2024 and standards amendment No. 70/2025; source 5 also lists No. 35/2024. That amendment act applies from 10 November 2024.

Sources: [1]-[8]

PRACTICAL GUIDE

# Further sources and image credits

Recheck regulatory status and actual goods before applying.

**[9] EEC · TR 047/2018, alcohol and introduction acts**
https://eec.eaeunion.org/comission/department/deptexreg/tr/TR_EAEU_047.php

**[10] Council Decision 21/2025 · alcohol regulation from 1 January 2026**
https://docs.eaeunion.org/documents/447/9931/

**[11] EEC · all technical regulations, original texts and sector amendments**
https://eec.eaeunion.org/comission/department/deptexreg/tr/TR_general.php

**[12] Decision 41/2018 · declaration registration**
https://old.adilet.zan.kz/rus/docs/H18EK000041

**[13] Decision 293/2012 · common document forms**
https://old.adilet.zan.kz/rus/docs/H12EK000293

**[14] Decision 711/2011 · EAC mark**
https://old.adilet.zan.kz/rus/docs/H11T0000711

**[15] European Commission · current sanctions information**
finance.ec.europa.eu · Open original source

**[16] AC Inorms · general EAC information and document images**
https://ac-inorms.com/eac-zertifikat

## Images and graphics

Cover: food image from the AC Inorms sector page (source 1). Document photograph: general EAC page (source 16). Decision, workflow, formula, HACCP, shelf-life, traceability and marking diagrams were created for this guide. They are not official EAC print templates.

Explanations are technical summaries, not official translations. Confirm national register, sanitary, veterinary, licensing and import rules in the actual destination.

Sources: [9]-[16]

PRACTICAL GUIDE

# Your food project with AC Inorms

A clear product/formula matrix leads to the appropriate procedure.

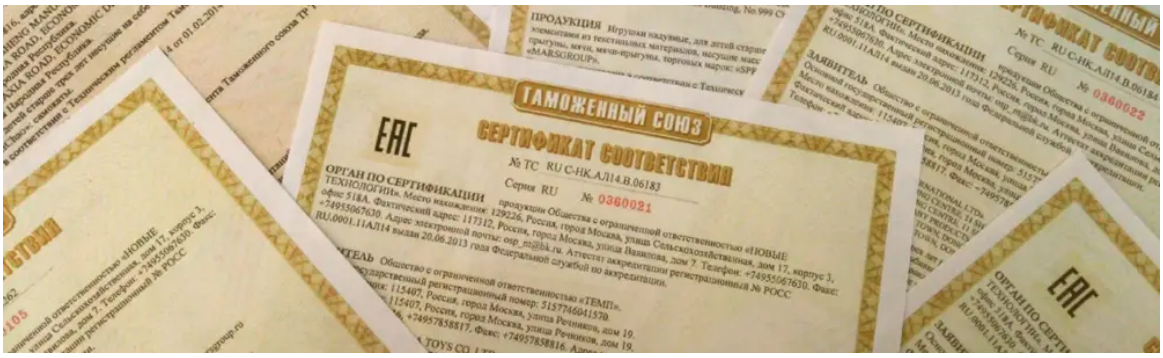



Image: technical records and EAC documentation.

AC Inorms supports manufacturers/exporters in classification, technical documentation and coordination of required conformity procedures for foods and beverages. Review available records for usability and agree product matrix, translations, samples and testing needs for the actual project.

| Service | Project contribution |
|---|---|
| Classification | Resolve category, route, scheme and destination. |
| Documentation | Support formulas, specifications, labels and translation. |
| Testing / procedure | Coordinate samples, laboratory, applicant and competent actors. |
| Maintenance | Plan changes, dates, register status and archive. |

## Contact · AC Inorms GmbH

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Send the enquiry form, item list, quantitative formulas, specifications, existing reports and labels. State destination, users, supply model and shipment date.

Sources: [1], [16]