

PRACTICAL GUIDE · 2026 EDITION

EAC Declaration for Packaging and Closures

A comprehensive handbook for manufacturers,
exporters and product managers



**PACKAGING · CLOSURES · FOOD CONTACT
TESTING · DOCUMENTATION · CHECKLISTS**

How to use this guide

From packaging specifications to a registered declaration and shipment release.

This handbook is intended for packaging manufacturers, converters, exporters, importers and product managers. It covers finished packaging and closures made from metal, plastics, paper and board, glass, wood, composites, textiles and ceramics. Special applications such as food contact, cosmetics and children's products are addressed specifically. It draws on the AC Inorms sector page, regulations archive and linked official legal sources.

The central document: the EAC declaration

"EAC certification of packaging" is a common sector description. For covered products, however, TR CU 005/2011 requires declaration. A certificate is not an alternative mandatory form under that regulation. Scheme selection depends on use and supply arrangement; exclusions and packaging made by the producer of the packaged product require separate assessment.

Use pages 4-14 for classification and procedures, pages 15-18 for evidence, and pages 19-31 for materials and applications. Pages 32-39 address manufacture, marking and project management. The case study, FAQs and worksheets appear on pages 40-45; appendices provide regulations, terminology and sources.

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The amendments under Council Decision No. 61/2024 effective from 5 March 2025 are considered. Original texts and current amendments take precedence. Examples support project planning; binding classification requires the actual product data.

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Chapters and sources are linked directly within the PDF.

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Suggested starting point

First establish whether the supplied object is finished packaging, a closure or a raw material. Then assess intended use, exclusions and supply arrangement. The scheme follows this classification rather than the material name alone.

Quick start: seven decisions

Product, contents and supply arrangement determine the assessment route.

Step	Question to resolve	Result
01	Finished packaging, closure, raw material or accessory?	Assessment object
02	Material, layers, coating and construction?	Technical identity
03	Which contents, contact, temperature and duration?	Intended-use scope
04	New, used, in-house manufacture or excluded case?	TR 005 applicability
05	Series or uniquely identified batch?	Scheme and applicant
06	Which reports and records are currently usable?	Testing and dossier plan
07	Register, accompanying information, marks and import resolved?	Shipment release

Your initial information package

Provide an item/material list, drawings or photographs, datasheets and a description of the intended contents. Add manufacturer, factories, dimensions, wall or film thicknesses, layer structure, coatings, closures, contact conditions, quantity and destination. Proposed HS/TN VED codes help reconciliation.

Specify the use

“Food grade”, “universal” or “for export” is not an adequate specification. A cup for cold drinks is not automatically assessed for hot filling or fatty foods.

FUNDAMENTALS

The EAEU market

EAC provides a common conformity framework for five countries.

One economic area - five member states

EAEU / Eurasian Economic Union

Armenia

EAC

Belarus

EAC

Kazakhstan

EAC

Kyrgyzstan

EAC

Russia

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 packaging 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.

TR CU 005/2011: legal foundation

The packaging regulation has applied since 1 July 2012.

TR CU 005/2011 “On the safety of packaging” was adopted by Commission Decision No. 769 of 16 August 2011. It regulates the safety of covered packaging and closures and associated requirements for storage, transport and disposal. Country of origin does not alter applicability on the EAEU market.

Regulation section	Project use
Articles 1-2	Scope, exclusions, definitions and identification.
Articles 4-5	Safety requirements and suitable test basis.
Article 6	Material marking and accompanying information.
Article 7	Declaration schemes, applicants, evidence and validity.
Article 8	EAC marking in accompanying documentation.
Annexes 1 / 1 ¹ / 2	Migration, organoleptic requirements and contact modelling.
Annexes 3 / 4 / 5	Material codes, symbols and covered products.

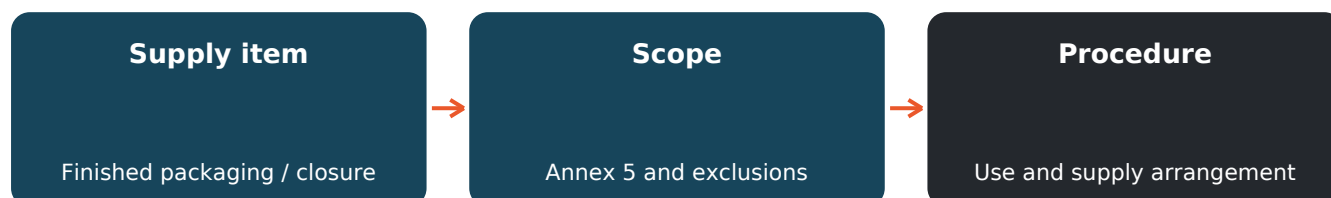
Council Decision No. 61 of 6 September 2024 particularly amended conformity assessment; the amendments apply from 5 March 2025. The EEC also lists the standards under Decision No. 9/2024 as amended by No. 86/2024. Use current original texts and the standard appropriate to each test parameter for every assignment.

Do not reuse historic transition dates

Historic deadlines from 2012-2015 do not establish a current exemption. For existing documents affected by later amendments, assess the actual applicable transition acts separately.

What qualifies as packaging?

Distinguish finished packaging from raw materials.



Establish applicability before choosing the document

The regulation covers finished packaging and closures under Annex 5 placed on the EAEU market. Packaging is used to contain, protect, transport, load, deliver or store raw materials and finished products. A packaging material is the material from which packaging is manufactured.

Supply item	Assessment
Empty bottle / can / carton	Finished packaging; assess use and Annex 5 entry.
Lid / cork / sealing insert	Closure; assess material, construction and use.
Granules / coating / adhesive	Input material; no automatic packaging declaration.
Film / aluminium foil	Assess supply form, purpose and Annex 5 footnote for listed retail films/foils.
Transport packaging	Can be covered; observe actual exclusions for cargo containers and transport pallets.

Connect tariff code and technical description

Justify classification using the actual object and function. A code for plastic goods does not mean that every item is packaging.

Empty, filled and in-house packaging

Manufacture and market placement affect evidence requirements.

Situation	Project decision
Empty packaging is sold	Standalone finished product: assess TR 005 applicability and declaration.
Purchased packaging is filled	Reconcile supplier evidence, use, safety and marking with the contents.
Product producer makes packaging during production	Assess the special rule in Article 1(2); specified requirements still apply.
Filled product is imported	Separate packaging safety from contents regulation; clarify supply chain and necessary evidence.
Packaging system has several parts	Identify container, closure, seal and other relevant parts unambiguously.

For in-house manufacture under Article 1(2), the specified requirements apply, particularly safety and material/recovery information. Article 7 does not prescribe a standalone declaration for that specifically defined situation. This is not a blanket exemption for every filler or every imported filled product.

Keep reports in the correct product file

Article 5(10) provides for test reports on packaging made during the producer's own process to be included in the evidence file for the packaged product. Document the actual manufacturing process and relationship between packaging and contents.

Contents approval alone is insufficient

A valid food document does not automatically establish that every package is suitable for all temperatures, contact durations and contents.

Exclusions and used packaging

Other requirements may apply outside TR 005.

Case	Boundary
Medical devices / medicines / pharmaceutical products	Their packaging and closures are excluded from the regulation.
Tobacco products	Article 1 exclusion; assess the contents regulation, such as TR CU 035/2014, separately.
Dangerous goods	Dangerous-goods packaging excluded; assess carriage rules and actual packaging approval.
Cargo containers / transport pallets	Exclusion for the transport modes named in Article 1; do not extend to every crate or container.
Used packaging	No conformity confirmation under Article 7(2); assess condition, safety and additional duties.

Record a non-applicability decision with product description, purpose and the precise provision. “No TR 005 declaration” does not mean “no import requirements”. For medical, pharmaceutical or dangerous contents, packaging can form part of another safety or approval framework.

Distinguish new from reusable

Newly manufactured reusable packaging is not automatically used packaging. Assess its initial supply and later circulation separately.

Applicant and EAEU representation

Current Article 7 distinguishes series production from batches.

Role / supply	Eligibility and responsibility
Series production	Applicant: manufacturer or authorised manufacturer's representative with appropriate EAEU registration.
Batch	Manufacturer, authorised representative or seller/importer as eligible EAEU applicant.
Foreign manufacturer	Mandate a suitable representative; record duties, responsibility and product scope.
Manufacturer	Control technical identity, safe production, records and changes.
Applicant	Review evidence, adopt/register the declaration and retain records.
Laboratory / QMS body	Provide testing or management-system certification appropriate to the scheme.

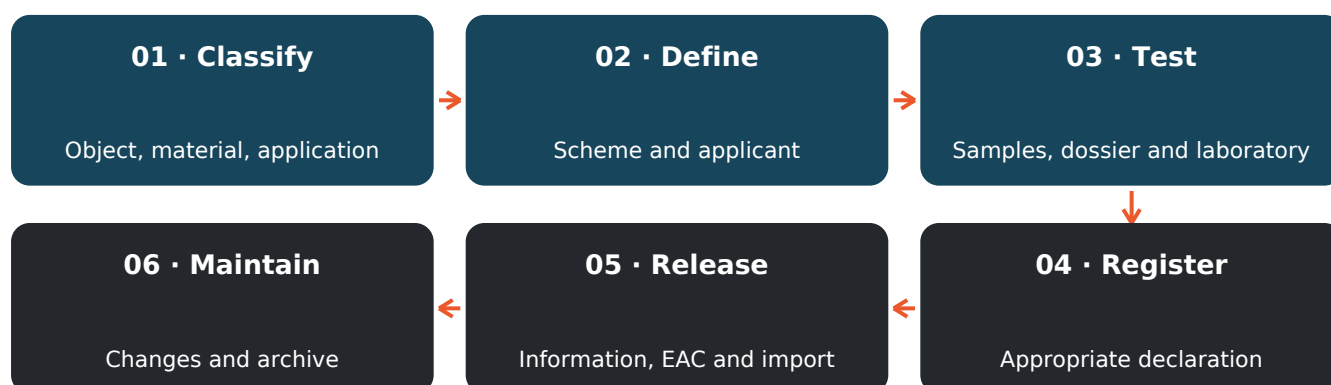
Choosing a customer as applicant can create practical dependence over records, imports and changes. TR 005 does not by itself automatically grant that customer exclusive distribution rights. Distribution rights follow the agreed contracts; document use and import eligibility require separate arrangements.

Arrange independence explicitly

Define access to reports and annexes, who reports changes and how documents are used for supplies to several customers. AC Inorms can coordinate a suitable contracted representative.

Project workflow to shipment release

Six stages connect classification, testing and documentation.



After enquiry, confirm scope, use, exclusions and supply arrangement. Then select the permitted scheme. Build the dossier, identify representative samples and plan required tests. Review existing reports for coverage and currency.

Release point	Required decision
Scope	Items, materials, construction, factories and applications are consistent.
Testing	Samples and test programme cover the intended packaging family.
Declaration	Applicant, reports, registration, annexes and validity agree.
Shipment	Accompanying information, material marking, EAC and import reviewed.

Do not commission reports prematurely

A laboratory needs material, contents and contact conditions to establish correct testing. Agree these details before sending samples.

Declaration schemes compared

Use determines the permitted scheme group.

Scheme	Supply arrangement	Testing basis / additional element
1d	Series; other covered packaging	Accredited laboratory or manufacturer's own laboratory; production control.
2d	Batch; other covered packaging	Accredited laboratory or manufacturer's own laboratory; identified batch.
3d	Series; special uses	Accredited laboratory and production control.
4d	Batch; special uses	Accredited laboratory; document the batch unambiguously.
6d	Series; special uses	Accredited laboratory and certified production-related management system.

The special uses in Article 7(2.1) cover packaging for food including baby/children's food, cosmetics and perfumery with direct product contact, and toys/children's goods having direct contact with the child's mouth. Schemes 3d, 4d or 6d apply to those cases.

Other covered packaging uses 1d and 2d. These may be replaced by 3d, 4d or 6d on request, matched to the supply arrangement. The document remains a declaration. A general ISO certificate is not mandatory for every project; for 6d, the prescribed system evidence is required.

Confirm the scheme before dossier release

The same plastic container can belong to a different scheme group depending on purpose. Material alone is insufficient for procedure selection.

Series production: 1d, 3d and 6d

Ongoing production needs a stable technical and organisational scope.

A series declaration covers described ongoing production during its validity. Manufacturer, factories, composition, construction, variants and applications must be traceable. Article 7 sets a maximum validity of five years; a shorter requested duration is possible.

Work package	Series-specific preparation
Technical records	Design, technology, specification, essential parameters and product description.
Standards / solutions	Applied provisions; technical solutions and risk assessment where necessary.
Representation	Manufacturer mandate and responsibility for nonconformity.
Manufacture	Production control and measures for stable conformity.
Scheme 6d	Certified management system covering packaging production.
Identity	Applicant registration and complete product/factory data.

Review new factories, materials or uses for document coverage before supply. Series scope does not authorise export of arbitrary packaging under the same brand. Include product codes and families on a technically justified basis.

Five years means continuing responsibility

Production, safety, register status and documented scope must remain appropriate throughout validity. An unchanged expiry date does not replace change assessment.

Batch declaration: 2d and 4d

The document remains tied to a specific supply quantity.

Identity field	Required relationship
Contract / order	Link to the specific agreed supply.
Product list	Descriptions, items, material, construction and application.
Quantity	Record batch count/size traceably.
Shipment records	Invoice and accompanying data identify the same batch.
Samples / reports	Traceable selection and relationship to the assessed batch.
Applicant	Eligible EAEU party under Article 7(3).

The current text sets no fixed validity period for a batch declaration. It applies exclusively to the identified batch. It is not indefinite series approval or a basis for new supplies with another batch identity. Actual safety and packaging storage life remain separate considerations.

Plan ahead for repeated shipments

For regular supplies of the same packaging, compare separate-batch effort with a suitable series project. An initially cheaper batch route can create more administrative and testing work when repeated. Reassess applicant eligibility when changing routes.

Do not expand the batch retrospectively

Compare additional quantities or products with the actual document data before using the declaration. A new trade document alone does not extend the assessed scope.

The technical evidence dossier

Records must connect product identity with safety requirements.

Document block	Contents and function
Product identity	Items, brands, dimensions, materials, layers, coatings and factories.
Use	Contents, contact, temperature, duration, single/reusable use and users.
Technical basis	Drawings, specifications, technology and relevant performance parameters.
Requirements mapping	Provisions, standards, solutions and necessary risk assessment.
Evidence	Sample identity and suitable test reports.
Applicant / contract	Registration, mandate or batch contract/shipment documents.
Accompanying records	Material marking, use instructions and approved language versions.

The sector page mentions a technical passport, instructions and existing CE, ISO, EAC or GOST records. Use them as potential information sources; they are not universally mandatory for every packaging project. Article 7 and the selected scheme determine required contents. A simple carton does not need invented machinery operating instructions.

Control versions

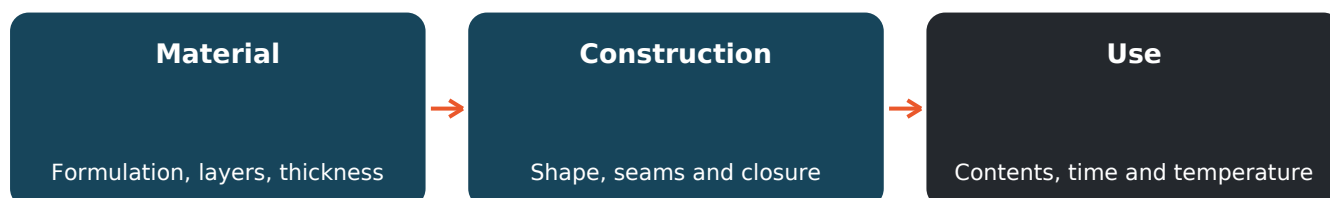
Maintain a list with identifier, language, version, approval and owner. Link reports to material formulation and item. Do not inadvertently combine old tests and new coatings into an apparently complete dossier.

Close information gaps before applying

Resolve missing contact conditions, unknown layers or unclear factories before binding document release.

Product families and representative samples

Shared material names alone do not justify a combined assessment.



A family needs technically substantiated common features

Article 7 permits a declaration for a specific product or a group using the same materials, construction and safety requirements. Representative samples must account for material, dimensions and thickness. Justify grouping technically and agree it with the laboratory.

Grouping field	Review question
Material / formulation	Same polymer basis, additives, pigments, coatings and contact layer?
Construction	Same shape, joints, closure principles and manufacture?
Dimensions / thickness	Which variant is particularly relevant to migration or strength?
Use	Same contents, temperature, duration and contact conditions?
Factory / process	Is manufacture technically comparable and documented?

Document sample identity

Photographs, item number, batch, factory, material version and sampling date accompany the sample. A tested standard item does not cover every special colour or new barrier layer without justification.

Laboratory, standards and test programme

Scheme and test parameters determine permitted evidence.

Planning point	Definition
Safety question	Mechanical performance, tightness, chemical resistance and hygiene where applicable.
Method	Current parameter-specific standard and permitted sample preparation.
Laboratory choice	Accredited laboratory for all schemes; manufacturer's own laboratory also possible for 1d/2d.
Competence	Actual scope covers product group, method and measurement range.
Samples	Representative identity, count, conditioning and intact shipment.
Result	Values, units, limits and unambiguous relationship to the test object.

The updated text expressly permits the manufacturer's own testing laboratory for 1d and 2d. This does not universally permit arbitrary external unaccredited laboratories. Schemes 3d, 4d and 6d require accredited laboratory testing. Assess the actually required competence and register scope.

Distinguish two standards lists

One list supports compliance with safety requirements; the other contains test and measurement methods including sampling. Voluntary use of a compliance standard does not make safety requirements optional. Alternative solutions require technically traceable proof of conformity.

Approve the test programme before dispatch

Provide the laboratory with the complete use specification. For food contact in particular, establish simulant, contact time and temperature before testing.

Test reports: currency and acceptance

The one-year condition is critical under amended Article 7.

When adopting and registering the declaration, no more than one year may have elapsed since approval of the underlying test reports. Plan testing and registration as a connected process. Translating an old report does not make it current.

Review	What to establish
Identity	Same product, material, construction, factory and intended use?
Date	Report approval within the prescribed period?
Method	Appropriate testing, model conditions and current permitted basis?
Laboratory	Competence and laboratory type compatible with the scheme?
Results	Complete, plausible, correct units and assessment against relevant requirements?
Usability	Document rights, language version and evidence mapping secured?

Existing European food-contact reports can supply valuable technical information. EAEU test conditions and document requirements nevertheless need separate assessment. An EU declaration, CE document or ISO certificate does not replace the registered TR 005 declaration.

The deadline is not an annual re-registration duty

The one-year condition concerns reports at adoption/registration. It does not automatically require every existing series declaration to be reissued annually. Assess changes and further obligations separately.

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Metal packaging

Assess construction, coating and corrosion behaviour together.

Covered groups can include cans, drums, kegs, canisters, tubes and other metal packaging specified in Annex 5. Aluminium foil is listed there with a particular retail footnote. Actual use determines the scheme and sanitary testing. Dangerous-goods packaging follows the exclusion and requires separate treatment.

Assessment area	Technical task
Mechanical performance	Pressure and load behaviour appropriate to construction/use.
Tightness	Assess seams, folds, welds and closures as a system.
Coating	Resistance to contents and any sterilisation/pasteurisation.
Corrosion	Consider alloy, surface and storage conditions.
Food contact	Migration from metal, alloy, lacquer and relevant contact parts.
Identity	Record material grade, coating formulation and manufacturing process.

A new internal lacquer can change the sanitary assessment basis even when shape and external dimensions remain unchanged. Suitability claims for acidic or fatty contents must be covered by selected contact conditions. Mechanical tests and chemical migration address different questions.

Assess the complete system

A safe can comprises container, coating and closure. Good individual material values do not establish tightness or resistance of the finished system.

Plastic packaging

Polymer, additives and actual contact conditions determine assessment.

Annex 5 includes bottles, canisters, cups, trays, containers, tubes, sacks, bags and certain films. PET, PE, PP or PS are starting points for identification; additives, pigments, recycled content, barriers and manufacture also matter. “Plastic packaging” alone is insufficient for a technically sound product family.

Feature	Project assessment
Shape / wall thickness	Strength, drop loading, tightness and suitable samples.
Contact side	Composition and migration from relevant layers.
Seams / handles	Seam tightness and carrying capacity where applicable.
Temperature	Hot-water, filling and use resistance for actual application.
Contents	Chemical resistance and food-contact conditions.
Changes	Raw material, masterbatch, recyclate and new process conditions.

Bags and sacks have different construction-related requirements from rigid containers. Do not apply one test scope mechanically to every shape. Packaging for cosmetics and food also needs the appropriate special scheme group.

Recyclate is not automatically equivalent

The same polymer abbreviation does not establish identical purity, safety or migration. Substantiate actual material quality and permitted use.

Paper and board packaging

Fibre material, coatings and mechanical loading form the assessment basis.

Groups include boxes, folding cartons, cases, trays, sacks, bags and packaging papers specified in Annex 5. Corrugated board, other board and paper have different material codes. Coated paper packaging can be a composite; document the complete structure.

Assessment field	Relevant factors
Mechanical performance	Drop/impact loading and compression/stacking strength by construction.
Handles	Attachment and capacity of carrying elements.
Material	Fibre material, recycled content, sizing and relevant additives.
Print / coating	Contact layer, set-off, odour and migration questions.
Food contact	Dry/moist/fatty conditions, contact duration and temperature.
Logistics	Humidity, conditioning, stack height and shipment protection.

An outer shipping carton for technical goods and direct food-contact packaging do not automatically share the same scheme or test scope. Testing unprinted raw board does not cover new printed, glued and coated packaging without technical reconciliation.

Consider humidity in the project

Strength values are meaningful only alongside sample preparation and use conditions. Define storage and transport conditions before assessing limits.

Glass packaging

Consider breakage resistance, thermal change and chemical properties.

Glass bottles, jars, vials and other Annex 5 forms are assessed by application and construction. Article 5 sets requirements including internal pressure, thermal change and relevant chemical resistance. Include closures and seals as additional contact and functional parts.

Application	Assessment focus
Beverage bottle	Pressure, filling, thermal loading and appropriate closure.
Preserving jar	Acid resistance, thermal processing and system tightness.
Cosmetic vial	Product contact, chemical resistance and dosing closure.
Decorated glass	Relevant glass, decoration and coating constituents in sanitary assessment.
Reusable packaging	Intended cleaning/use; assess used condition separately.

For food contact, assess relevant migration including appropriate glass provisions. TR 005 also states that glass packaging must not be reused for contact with baby/children's food. New reusable packaging and used packaging remain different assessment cases.

Describe the complete application

A bottle tested for cold filling is not automatically released for hot filling, sterilisation or different internal pressure.

Wood packaging and cork

Assess TR 005 scope and plant-health requirements separately.

Annex 5 contains specified wooden packaging for food and agricultural products, including crates, barrels and boxes. Cork also appears as a closure material. Article 1 expressly excludes transport pallets and cargo containers; this does not exclude every wooden crate.

Assessment field	Project content
Construction	Strength, joints, safe handling and relevant loading.
Material	Wood species, processing, moisture, coating and auxiliary substances.
Food contact	Sanitary suitability, extracts and odour for actual use.
Cork closure	Contact, tightness, material quality and system compatibility.
Plant health	Separately assess ISPM 15 and import requirements for covered wood packaging.

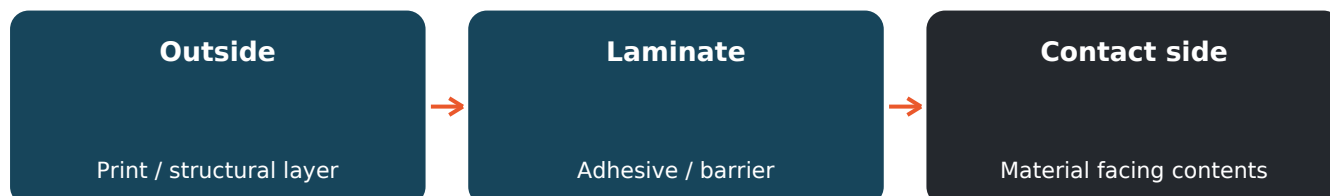
Plant-health treatment or IPPC marking is not EAC conformity evidence. Conversely, a TR 005 declaration does not automatically confirm every plant-health import condition. Processed wood products and solid wood may require different assessment.

Name the supply item precisely

Record whether the supply is a pallet, covered food crate, cork closure or another wood product. “Wood packaging” alone leaves these distinctions unresolved.

Composite and multilayer packaging

Layer structure supports identity and sanitary assessment.



Schematic structure: document actual layers individually

A combined material under the regulation has two or more layers that cannot be separated without losing functional or physical properties. Examples include paper/plastic and paper/plastic/aluminium systems. Classification follows actual structure rather than the visible outer material alone.

Component	What to document
Contact layer	Material, thickness, formulation and resistance to contents.
Barrier layer	Function, material and limits of assumed protection.
Adhesive / print	Processing, curing and relevant transfer/migration questions.
Complete structure	Layer sequence, lamination, seams and mechanical properties.
Marking	Appropriate composite code and abbreviation under Annex 3.

A middle-layer change can matter

Layers without direct contact can still affect safety. Assess new adhesives, inks and barriers before adding variants to an existing scope.

Textile packaging, sacks and flexible systems

Seams, load capacity and use determine testing.

Textile packaging can include sacks, bags and Annex 5 containers for food or other products. Distinguish plastic fabric, composite structures and textiles according to actual construction. A flexible bulk container used for dangerous goods requires separate classification because of its use.

Assessment area	Project requirement
Material	Fibre/fabric, coatings, liners and relevant additives.
Mechanical performance	Drop and tensile/tear loading under applicable requirements.
Seams / connections	Joints, capacity and resistance under actual loading.
Contact	Direct contact or inner liner; hygiene by contents/use.
Handling	Fill quantity, load, lifting equipment and safe storage.

Assessment of the outer material does not automatically cover another inner liner or new seam designs. The product list must traceably describe capacities and relevant variants. Food contact also triggers the special scheme group under Article 7.

Do not confuse transport approval with EAC

Special dangerous-goods packaging approval and a TR 005 declaration are different decisions. Intended use determines which route is applicable.

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Ceramic packaging

Consider glaze, material and intended contact together.

TR 005 identifies ceramics as a packaging material; Annex 5 lists certain ceramic packaging for food and cosmetics, such as bottles, jars and barrels. Household tableware does not become packaging solely because it is ceramic. Establish function and market placement before selecting the route.

Assessment field	Relevant information
Material / glaze	Composition, decoration, firing process and contact surfaces.
Sanitary assessment	Relevant migration, particularly appropriate lead/cadmium provisions.
Mechanical performance	Safe design and applicable strength/temperature requirements.
Closure	Tightness, compatibility and contact parts.
Use	Contents, temperature, contact duration and intended application.

Annex 1 contains specific sanitary provisions for glass, porcelain, earthenware and ceramics. Reconcile appropriate test conditions and units with the laboratory. A decorative sample or material certificate does not replace assessment of the finished contact surface.

Group decoration variants carefully

Different glazes or pigments can alter migration. Identical external dimensions therefore do not automatically establish the same sanitary assessment.

Closures and sealing systems

Container and closure must be technically and hygienically compatible.

TR 005 covers Annex 5 closures made from metal, cork, plastics, composites and board. These can include lids, caps, stoppers, seals, dosing restrictors and other expressly listed closure items.

Actual application and the specific entry are decisive.

System question	Project assessment
Fit	Dimensions, thread/seat, closing force and manufacturer combination.
Tightness	Leakage, pressure and relevant storage/transport conditions.
Contact	Internal coating, liner, seal and other product-contact parts.
Resistance	Contents, temperature, cleaning and any thermal processing.
Marking	Material marking directly where technically/structurally possible; otherwise accompanying information.

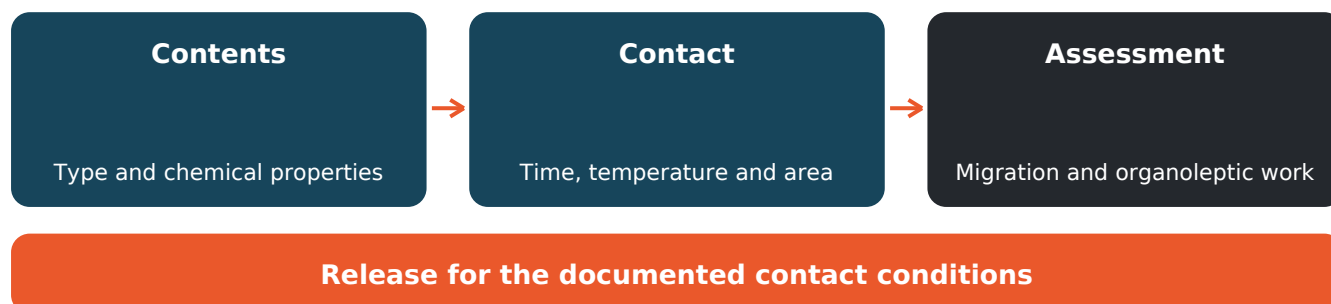
A bottle declaration does not automatically cover a separately supplied closure. Likewise, an individually tested lid does not establish every bottle/lid combination. Review document coverage and system testing together. Food and direct cosmetic contact use the special schemes.

Do not overlook the seal

Even small inserts or coatings can affect migration. Keep the complete bill of materials, including contact materials and suppliers, current.

Food-contact packaging

Release applies to defined contents and contact conditions.



Specification field	Define
Food	Dry, aqueous, acidic, salty, alcoholic, fatty or another relevant type.
Contact	Direct contact, contact area, fill quantity and ratio to contents.
Time	Filling, storage and consumption; maximum intended contact duration.
Temperature	Cold, ambient, hot filling, pasteurisation or sterilisation.
Material	Contact layer, all relevant constituents and material version.
Users	Baby/children's food and special applications where relevant.

Schemes 3d, 4d or 6d apply to this group. Article 5 and Annexes 1, 1¹ and 2 connect chemical migration, organoleptic properties and model conditions. Test selection depends on actual use as well as the polymer.

Use EU records deliberately

Existing EU food-contact records support the dossier. Check differences in limits, simulants and conditions; EU evidence does not create automatic EAEU acceptance.

Migration: media, time and temperature

Annex 2 models intended use under aggravated conditions.

Food example	Model media from Annex 2
Fresh meat / fish	Distilled water and 0.3% lactic acid.
Salted / smoked products	Distilled water and 5% sodium chloride solution.
Juices / soft drinks / beer	Distilled water and 2% citric acid.
Vodka / cognac	Distilled water and 40% ethanol.
Lead/cadmium from glass or ceramics	4% acetic acid for the specified investigation.

Intended food-contact duration	Model test duration
Up to 10 minutes	2 hours
Up to 2 hours	1 day
2 to 48 hours	3 days
More than 2 days	10 days

These examples are an excerpt, not a complete test programme. Annex 2 includes further food groups, material-specific exceptions and special sterilisation conditions. For hot food contact and the listed hot-filling uses, simulants are introduced at 80°C and then held as prescribed. The laboratory establishes the applicable combination from the complete specification.

Do not select the easiest medium

Selection must account for the actual food and all applicable notes. A water extract alone does not substantiate every alcohol, fat or acid application.

Organoleptic assessment: odour, taste and extracts

Chemical limits and sensory requirements are assessed separately.

Annex 1¹ contains dedicated organoleptic requirements for food-contact packaging, including baby/children's food. A product can meet chemical limits yet cause an unacceptable change in odour or taste. Both layers belong in the safety assessment.

Investigation	Requirement under Annex 1 ¹
Odour of the packaging sample	Maximum 1 point under the prescribed procedure.
Aqueous extract for the specified higher-moisture packaging	Odour maximum 1 point; taste, turbidity, sediment and coloration generally not permitted.
Air extract for the specified lower-moisture packaging	Changes to odour, taste and colour of the prescribed sorbent not permitted.
Cork / wood	Observe express exceptions for coloration/sediment during modelling.

The laboratory must consider the annex's moisture thresholds and use-specific method. Inks, adhesives, coatings and inadequate curing can matter. Odour assessment of a raw material does not automatically replace examination of finished printed packaging.

Do not dismiss a sensory finding

Investigate an unusual odour technically and identify the affected variant. A material code or existing declaration does not explain the finding.

Cosmetics, children's products and special contacts

Contact type and precise intended purpose determine scheme and testing.

Application	Assessment
Cosmetics with direct packaging contact	3d/4d/6d; reconcile packaging/closure with product chemistry.
Outer cosmetic carton	Not automatically equivalent to directly contacting primary packaging.
Toys/children's goods with mouth contact	Assess the special Article 7 situation and contents regulations.
Baby/children's food	Food-contact requirements; specify special use unambiguously.
Other technical contents	Chemical resistance and applicable safety requirements.

Decorative outer packaging and a directly contacting jar perform different functions. Creams, oils, alcohol-containing products or fragrances can raise different resistance questions for contact materials and seals. Packaging evidence and cosmetic-product evidence under TR CU 009/2011 remain separate assessment fields.

Avoid blanket classification of children's products

Read the precise wording of Article 7. Packaging does not enter the special scheme group solely because a child might see or touch it. Substantiate contents, contact and product category.

Resolve borderline cases early

Agree the application with the competent technical party before setting laboratory assignments and declaration scope.

Production control and changes

Conformity must be maintained during ongoing manufacture.

Control point	Practical implementation
Incoming goods	Check material, formulation, supplier and relevant quality properties.
Process	Control forming, coating, bonding, printing, curing and closing.
Finished product	Monitor dimensions, tightness, strength and relevant release tests.
Traceability	Connect factory, batch, material version and supply quantity.
Change	Assess new inputs, colours, factories, designs and uses.
Nonconformity	Block affected products, investigate causes and arrange required contacts.

Article 7 requires production control and stable manufacture for 1d and 3d. For 6d, stability of the certified management system and production conditions also applies. Annual certificate surveillance used in some other EAC procedures must not be applied universally to every packaging declaration.

Assess changes before series release. A new additive or adhesive can affect migration despite identical external shape. Greater wall thickness may change mechanical properties or model conditions. Reconcile the product list with each assessed version.

Assign responsibility in writing

Define who assesses changes, informs the applicant and initiates further tests or new documents when needed.

Material marking and accompanying information

Article 6 distributes information between packaging and documents.

Information	Requirement / placement
Material identification	Code and/or abbreviation under Annex 3; packaging and/or accompanying documents.
Missing packaging marking	The filler adds material identification to the label according to packaging records.
Closure	Direct marking where technically/structurally possible; otherwise accompanying records.
Symbols	Applicable Annex 4 symbols including food contact and the Möbius loop.
Accompanying information	Name, purpose, storage, transport, recovery and reusable-packaging treatment.
Parties / date	Manufacturer/contact, representative/importer where present, manufacture month/year, storage period if set.

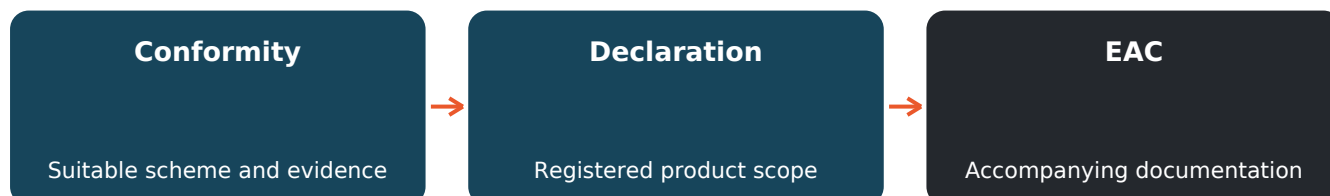
Provide required information in Russian and additionally in state languages where national law requires. Material markings must be durable, abrasion-resistant and unambiguous. Check exact symbol design against the annexes; EAC, material code and product label perform different functions.

Avoid a universal label list

Not every field mentioned on the webpage must appear identically on every packaging surface. The actual required information and permitted location are decisive.

EAC mark: the packaging-specific rule

Article 8 requires EAC in accompanying documentation.



TR CU 005/2011 · Article 8: EAC in accompanying records

Packaging and closures meeting TR 005 and completing the prescribed conformity procedure require the common market-circulation mark. Article 8(1) places it in accompanying documentation. This does not establish a universal obligation to print EAC on every empty individual package.

Review question	Requirement
Timing	Before market placement, after assessment and registration.
Eligibility	All applicable technical regulations and their procedures met.
Design	Official proportions, monochrome and contrasting; basic dimension at least 5 mm.
Legibility	Clearly recognisable and durable for the required period.
Document relationship	Accompanying records identify the assessed packaging and shipment precisely.

EAC on a filled food or cosmetic product may follow its own regulations. It does not alone establish that the packaging is released for arbitrary contents. Material codes and a food-contact symbol likewise do not replace registered conformity evidence.

Supply the correct documents

Ensure the relevant language version and product mapping travel through the supply chain. A mark without traceable records leaves actual evidence coverage unresolved.

Material codes and recycling information

Identification follows Annex 3 and the actual structure.

Material	Abbreviation	Code
Polyethylene terephthalate	PET / PETE	01 / 1
High-density polyethylene	PE-HD / HDPE	02 / 2
Polyvinyl chloride	PVC / V	03 / 3
Low-density polyethylene	PE-LD / LDPE	04 / 4
Polypropylene	PP	05 / 5
Polystyrene	PS	06 / 6
Corrugated board / other board / paper	PAP	20 / 21 / 22
Steel / aluminium	FE / ALU	40 / 41
Wood / cork	FOR	50 / 51
Cotton / jute	TEX	60 / 61
Glass: clear / green / brown	GL	70 / 71 / 72
Paper / plastic / aluminium	C/PAP if paper is the main material	84

The table is a targeted excerpt. Assess other plastics and composites against the complete annex. For composites, C/ is followed by the abbreviation of the material predominant by mass. Observe capital letters and permitted presentation with the Möbius loop under the original text.

A code is not a recycling guarantee

Material information supports collection and recovery. It does not alone prove that every local facility actually recycles the packaging or that all environmental duties are met.

Storage, transport and circular-economy duties

Safe handling and national environmental duties complement the declaration.

Area	Project assessment
Storage	Temperature, humidity, UV, stacking, cleanliness and set storage life.
Transport	Breakage, deformation, contamination, moisture and mechanical loading.
Reusable use	Intended cleaning/treatment, circulation and condition.
Disposal	National waste/environmental rules for the actual material.
Producer responsibility	Assess destination-specific registration, reporting, take-back or fees.
Wood / dangerous goods	Additional plant-health or carriage requirements where applicable.

TR 005 requires safe storage, transport and disposal. A declaration does not replace national environmental registrations or fees. Establish the responsible party, actual manufacturer/importer role and quantities for each destination. These environmental fields form an assessment list, not an assertion that national systems are identical.

Transport laboratory samples so their identity and properties are preserved. Deformed or contaminated samples can distort assessment. Clean samples and clear contact-side identification are especially useful for food contact.

Reusable does not automatically mean safer

Repeated use must suit the intended application. Assess used packaging and new products separately, legally and technically.

Registration, registers and import

The registered declaration supplies the prescribed evidence.

Article 7 refers to the common declaration form under Decision No. 293/2012 and the registration procedure under Decision No. 41/2018. Register the declaration with its supporting evidence. A draft, service invoice or test report alone does not replace this step.

Register field	Compare with shipment
Status	Valid, suspended, cancelled or otherwise restricted?
Applicant / manufacturer	Eligible parties and correct factories?
Product scope	Items, material, construction, uses and annexes covered?
Scheme / validity	Correct series/batch scope; appropriate dates/batch data?
Evidence	Assigned reports and permitted laboratory basis plausible?
Customs description	Technical identity, TN VED, quantities and documents consistent?

Use the official register appropriate to the issuing state and document type; retain dated check evidence. A QR code or stamped PDF alone does not establish current validity. Before shipment, provide the customs agent with the declaration, annexes and related product/shipment data.

Coordinate before the border

Sample imports, filled goods and independently traded packaging can require different handling. Clarify the actual supply arrangement before dispatch.

Cost, schedule and quotation

Portfolio breadth and test scope determine project effort.

Cost block	Typical driver
Classification	Families, material systems, applications and borderline cases.
Documentation	Technical data, translation, product lists and marking.
Testing	Sample count, mechanical parameters, migration and organoleptic work.
Registration / representation	Evidence route, applicant arrangements and agreed services.
Logistics	Samples, transport, import and necessary accompanying records.
Maintenance	Changes, new factories, additional variants and replacement documents.

The AC Inorms sector webpage gives approximately 10-12 working days and often EUR 3,000-5,000 as guidance. These are not a binding deadline or fixed price for every project. Simple established packaging and complex food-contact composites can require very different preparation and testing periods.

A quotation should identify families, scheme, duration, testing assumptions, representation, translation, registration and variable logistics costs. Complete contact conditions and current reports enable realistic planning. Include the reports' one-year condition in the schedule.

Define start conditions

A reliable schedule starts with confirmed scope, available records and suitable samples. Record open testing/information questions as milestones.

Validity and record retention

Series, batches and retention periods serve different functions.

Object	Current Article 7 requirement
Series declaration	Validity maximum five years.
Batch declaration	No fixed validity period; exclusively for the identified batch.
Reports at registration	No more than one year since approval.
Applicant: series	Declaration/evidence at least ten years after manufacture ends/is discontinued.
Applicant: batch	At least ten years after sale of the final item in the batch.
Authority/body copies	At least five years after expiry for time-limited documents, or ten years from registration without a fixed duration.

Manage storage life independently from document validity. A batch declaration without a fixed expiry does not make damaged or over-aged packaging safe. For electronic retention, ensure access, completeness and compliance with applicable national conditions.

Reassess before expiry

Begin replacement planning early using current product lists, factory data, changes and reports. An earlier test date, new use or new formulation may require additional work. Check register status during validity as well.

Assign an owner

Use a controlled process for deadlines, register checks, changes and customer information. The archive must also map past shipments to their evidence basis at the time.

Case study: three packaging families

A fictional export project demonstrates appropriate portfolio grouping.

A German manufacturer plans regular supplies of corrugated cartons for technical goods, PP cups for cold foods and composite pouches for fatty products to Kazakhstan. All items have EU records. Initially, the company wants one declaration under the broad description “packaging materials”.

Product family	Working decision
Corrugated carton	Finished packaging; other use; assess series 1d or a permitted higher scheme.
PP food cup	Food contact; series 3d or 6d; assess migration, organoleptic properties and construction.
Composite pouch	Distinct layer structure; food contact; assess relevant media, seams and variants.
Shared organisation	Combine master data, representation, archiving and supply planning.

The families differ in materials, construction and safety requirements. A common manufacturer alone does not make them a homogeneous group. Compare existing reports with the current one-year condition and EAEU test conditions. Prepare a clear product/evidence matrix for each family.

Outcome: shared coordination, appropriate evidence

The project can be coordinated jointly. Declaration scopes and test programmes follow technically substantiated families. Final decisions require actual product information.

Common mistakes and consequences

Clear specifications prevent repeated testing and rework.

Mistake	Consequence	Better approach
Expect a certificate rather than declaration	Wrong document planned.	Use Article 7 and the scheme.
Treat every material as finished packaging	Incorrect applicability.	Assess supply item and Annex 5.
Plan food cups under 1d	Special scheme group ignored.	Choose appropriate 3d/4d/6d.
Reuse old reports	One-year condition missed.	Check approval dates early.
Combine every material in one family	Unsubstantiated scope.	Compare material, design and requirements.
Require EAC on every package universally	Marking rule misapplied.	Article 8: accompanying records.
Use a batch as unlimited series	New shipment not covered.	Define batch and quantity.
Automatically grant customer exclusivity	Contract and representation confused.	Separate mandate from distribution rights.

Assign each open question an owner and date in the matrix. Early technical classification usually costs less than a new declaration, new labels or repeating unsuitable tests.

Frequently asked questions

Key answers before exporting packaging.

Do I need an EAC certificate for packaging?

TR 005 prescribes a declaration. “Certification” often describes the overall service; the legal document remains a declaration.

Must EAC be printed on every empty package?

Article 8 places the mark in accompanying documentation. Material marking and labelling of the packaged product require separate assessment.

Is an EU food-contact statement sufficient?

It supports data review but does not automatically replace EAEU testing and registration. Compare conditions, limits, laboratory and currency.

How long is the declaration valid?

Series: maximum five years. A batch has no set duration, but coverage is limited to the identified batch.

Can my customer apply for a series declaration?

Only with the status required by Article 7, such as authorised manufacturer’s representative. Simply being an importer does not automatically qualify for series.

Do used packages require a declaration?

Article 7 excludes them from conformity confirmation. Assess safety, condition, use and other import duties.

Does every declaration need an ISO certificate?

No. The specific management-system document belongs to 6d. Other schemes have their own requirements.

Checklist before shipment and market release

Link every check to the same product and shipment version.

Check	Release criterion	Status
Object	Finished packaging, closure or material clearly identified.	☐
Legal scope	Annex 5, exclusions and manufacture situation assessed.	☐
Identity	Material, layers, construction, variants and factories described.	☐
Use	Contents, time, temperature and contact conditions confirmed.	☐
Scheme	Appropriate series/batch scheme selected.	☐
Applicant	Establishment, status and mandate appropriate.	☐
Testing	Samples, laboratory and methods cover scope.	☐
Currency	Report one-year condition met at registration.	☐
Declaration	Registered; product/shipment and annexes covered.	☐
Register	Authenticity and current status checked.	☐
Marking	Material codes/symbols and EAC in accompanying records reviewed.	☐
Language / shipment	Information, languages, import and carriage resolved.	☐
Maintenance	Change, archive and deadline responsibilities assigned.	☐

Project / shipment: _____ Responsible person: _____

Date: _____ Decision / open items: _____

Document release

Keep this checklist with document versions, product list and register evidence. Resolve open safety/conformity questions before dispatch.

Packaging-project enquiry form

Complete applications enable realistic testing and cost planning.

Field	Your information
Company / contact	
Manufacturer / factories	
Destination / importer / representative	
Product / items / brands	
Packaging / closure / raw material	
Material / layers / coatings	
Dimensions / thickness / volume	
Contents / food group	
Contact time / temperature / filling	
Single-use / reusable / new / used	
Series / batch / quantities	
HS / TN VED code	
Existing reports / approval date	
QMS / existing documents	
Planned shipment / services	

Attach product list, datasheets, drawings, photographs and available reports. For food contact, add intended contents and all contact conditions.

Specify multiple families separately

Complete product details for technically distinct material/design groups. The combined list then shows the entire project scope.

Project matrix worksheet

Connect material, use and evidence for every item.

Family / item	Material / use	Scheme / evidence	Owner / date
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

How to manage the project

For each family, record construction, material version, application and factories. Add the provision and scheme. Record available reports, approval dates and information gaps. Check the one-year condition against planned registration and schedule required new testing in time.

Milestone	Documented decision
M1 · Classification	Scope, uses, exclusions and scheme confirmed.
M2 · Evidence	Dossier, samples, laboratory and conditions agreed.
M3 · Registration	Declaration, annexes and register data checked.
M4 · Shipment	Marking, accompanying information and dispatch released.

Keep changes visible

New materials, factories or applications receive a new review point. Version the matrix and compare it with the released product list.

Regulations archive: packaging and contents

Contents regulations do not replace packaging assessment.

Regulation	Relevance
005/2011	Packaging: central foundation
007/2011	Children's goods: contents/interface
008/2011	Toys: contents/interface
009/2011	Cosmetics: packaged product
010/2011	Machinery: assess packaging machines separately
017/2011	Light industry: packaged product
021/2011	Food: packaged product
022/2011	Food labelling
024/2011	Oils and fats: packaged product
029/2012	Food additives
033/2013	Dairy products: packaged product
034/2013	Meat products: packaged product
035/2014	Tobacco: excluded packaging
041/2017	Chemical products: separate supply objects

Links lead to the AC Inorms archive. For filled products, assess packaging and contents against their own applicability. A food carton is not declared under every food regulation merely because it contains food; the contents and their label have separate obligations. Medical devices, medicines and dangerous goods follow special routes outside TR 005.

Use standards lists as well

Current official TR 005 standards lists belong in the testing/safety basis. Sources on page 48 lead to these documents.

Packaging-project glossary

Key terminology for testing, declaration and export.

Term	Meaning
EAEU	Eurasian Economic Union with five member states.
TR CU 005/2011	Technical regulation on packaging safety.
Declaration	Conformity statement by an eligible applicant, with registration.
Finished packaging	Packaging placed on the market as a finished product within scope.
Packaging material	Material from which packaging is manufactured.
Closure	Product for closing packaging and preserving its contents.
Representative sample	Sample representing a technically homogeneous product group.
Model medium / simulant	Medium simulating relevant food properties.
Migration	Transfer of substances from packaging/closure into contact media.
Organoleptic assessment	Assessment of odour, taste and other sensory properties.
Composite material	Multilayer material inseparable while preserving its properties.
Batch	Specified, traceably identified quantity.
EAC	Common conformity mark; TR 005: accompanying documentation.
Möbius loop	Annex 4 symbol for the possibility of recovery.
ISPM 15 / IPPC	Plant-health basis/markings for covered wood; not EAC evidence.

Sources and legal foundations · 1

Core original texts, current amendments and procedure foundations.

[1] AC Inorms · packaging and materials

<https://ac-inorms.com/eac-zertifikat-fuer-verpackungen>

[2] AC Inorms · regulations archive

<https://ac-inorms.com/richtlinien-ac-inorms-gmbh>

[3] EEC · TR CU 005/2011, documents and amendments

<https://eec.eaeunion.org/comission/departement/deptexreg/tr/bezopypakovki.php>

[4] TR CU 005/2011 · updated original text and annexes

<https://old.adilet.zan.kz/rus/docs/H11T0000769>

[5] Council Decision 61 of 6 September 2024 · packaging amendments

<https://docs.eaeunion.org/documents/435/8285/>

[6] Decision 9 of 29 January 2024 · standards lists

<https://docs.eaeunion.org/documents/429/7945/>

[7] Decision 86 of 30 July 2024 · amended test standards list

<https://docs.eaeunion.org/documents/429/8246/>

[8] Decision 41/2018 · declaration registration and status

<https://old.adilet.zan.kz/rus/docs/H18EK000041>

Accessed and reviewed on 10 October 2026. German and English explanations are technical summaries, not official translations. Chapter footnotes refer to these numbered sources.

Further sources and regulatory position in 2026

The reviewed position forms the basis for the next project decision.

[9] Decision 293/2012 · common document forms

<https://old.adilet.zan.kz/rus/docs/H12EK000293>

[10] Decision 711/2011 · EAC mark and use

<https://old.adilet.zan.kz/rus/docs/H11T0000711>

[11] EEC · common sanitary requirements under Decision 299

https://eec.eaeunion.org/comission/departement/depsanmer/regulation/P2_299.php

[12] IPPC · ISPM 15: wood packaging in international trade

<https://www.ippc.int/en/publications/640/>

[13] AC Inorms · general EAC information and document images

<https://ac-inorms.com/eac-zertifikat>

What to recheck before an application

Confirm current regulation/standards versions, national registration processes, transitions for existing documents and actual product data. Amendments under No. 61/2024 apply from 5 March 2025; report currency, eligible applicants, dossier contents and retention are particularly important. Do not apply older webpage wording universally as a current obligation.

Images and graphics

Cover image and document photograph come from AC Inorms. Workflow, scope, contact and layer graphics were created for this guide. They explain the framework and are not official marking templates.

Your packaging project with AC Inorms

Clear material and intended-use scope leads to appropriate evidence.

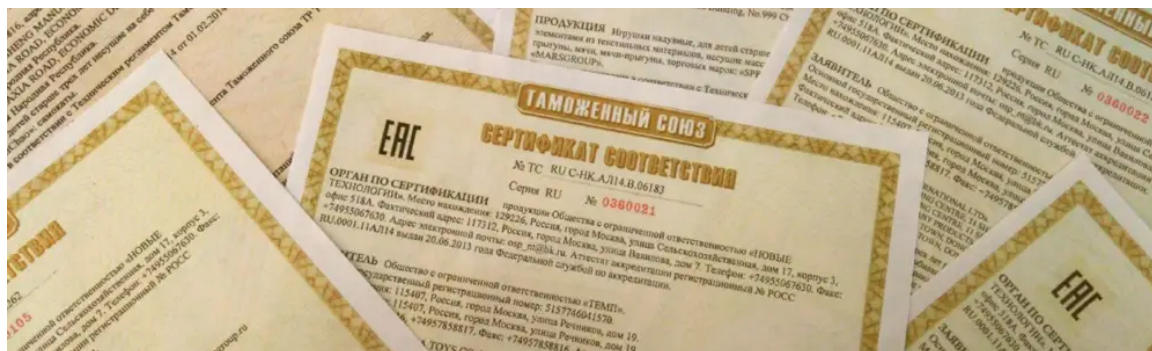


Image: technical records and EAC documentation.

AC Inorms supports manufacturers and suppliers in classifying packaging/closures, building a product matrix and coordinating the appropriate declaration procedure. Existing records are reviewed for usability; missing data and necessary tests are planned for the actual project.

Service	Project contribution
Classification / matrix	Clarify material, design, use, exclusions and scheme.
Documentation	Support technical data, translation, product lists and accompanying information.
Testing / registration	Coordinate samples, suitable laboratories, applicant and declaration.
Maintenance	Plan changes, replacement documents, register checks and archiving.

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For an initial assessment, send the enquiry form, item/material list and available technical records. State destination, supply arrangement, contact conditions and requested shipment date.