

PRACTICAL GUIDE · 2026 EDITION

State Registration SGR in Russia and the EAEU

A comprehensive handbook for manufacturers,
exporters and product managers



**HYGIENE PRODUCTS · COSMETICS · FOOD
TESTING · DOCUMENTATION · CHECKLISTS**

How to use this handbook

State product registration from classification to market support.

This handbook serves manufacturers, brand owners, exporters, importers and quality managers. It addresses state registration of products (SGR) in Russia, Belarus, Kazakhstan, Armenia and Kyrgyzstan. It focuses on hygiene products, household chemicals, selected cosmetics, specialised foods, certain children's articles and materials with hygiene-relevant uses. German and English editions share the same structure across 50 pages and the same worksheets.

Three decisions determine the route

First: is the actual product subject to SGR? Second: which legal basis and assessment route apply? Third: are additional documents or markings required? A customs code, positive laboratory result or foreign certificate alone cannot answer these questions. Intended use, composition, age group and the current legal text must agree.

Pages 4-10 cover foundations and classification; pages 11-25 cover product groups and exclusions. Roles, workflow and evidence follow on pages 26-36. Validity, registers, changes and import appear on pages 37-41. Costs, a worked case, FAQs and worksheets appear on pages 42-47; sources and contact on pages 48-50.

Edition 1.0 · As of 11 October 2026

The AC Inorms sector page and regulations archive have been technically updated against official sources. Current rules, transitions and future requirements are distinguished. This guide does not replace the official original text or classification of the actual product.

Contents

Navigate to chapters and linked legal sources.

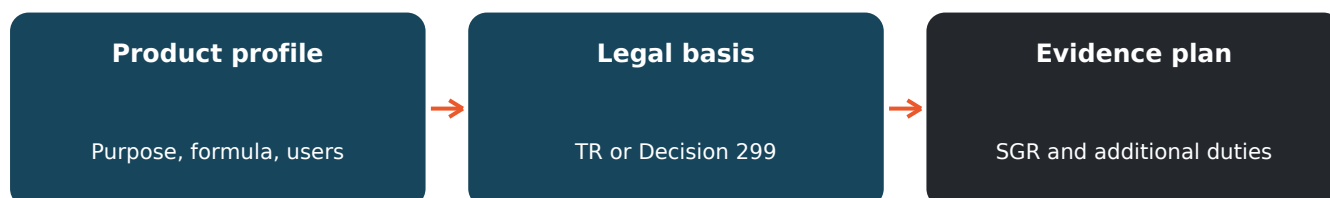
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Suggested starting point

Start with a product profile: precise intended use, complete composition, target users, manufacturer and factories, label and proposed TN VED code. Then establish the applicable regulation and registration scope.

Quick start: seven project decisions

Complete product identity is the starting point.



Product-specific decision · schematic explanation

Assessment area	Project implementation
01 · Identity	Define name, variant, presentation and manufacturer.
02 · Purpose	Document use, users, age and claims.
03 · Composition	Record the complete formula or material construction.
04 · Legal route	Technical regulation or Section II under Decision 299.
05 · Evidence	SGR, declaration where required and other approvals.
06 · Test plan	Samples, laboratory, methods, limits and report age.
07 · Shipment	Match active registry status, label and import file.

Classify before making a binding quotation. Descriptions such as “chemical”, “cosmetic” or “children’s product” are too broad. Changing users, a disinfectant claim or use in drinking-water systems can trigger a different legal basis. Give each item a row in the product matrix. Assess variants jointly only where technically justified; the number of trade names does not automatically equal the number of registrations.

In practice

The enquiry sheet on page 46 supports the initial assessment.

What SGR confirms

An official product registration with a defined scope.

Sanitary SGR

Decision 299

TR registration

Product-specific SGR

Other evidence

Declaration, marking

Product-specific decision · schematic explanation

Assessment area	Project implementation
Term	SGR: certificate of state registration of a product.
Decision-maker	Competent public authority of a member state.
Subject	Identified products and specified requirements.
Evidence	Dossier, investigation results and official assessment.
Reach	Union-law evidence within the five EAEU member states.

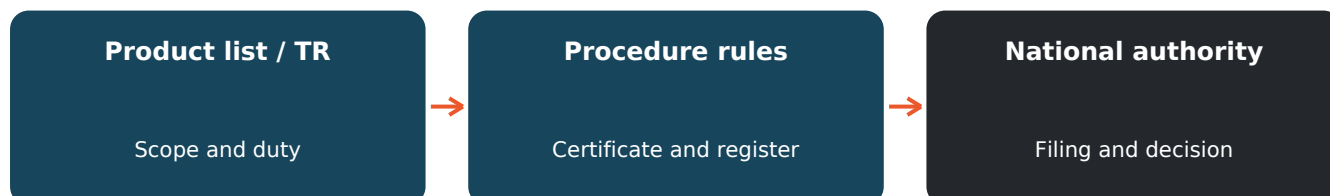
SGR is often called an “SGR certificate” or “hygiene certificate”. Technically, distinguish this official registration from EAC certification by an accredited certification body. SGR confirms compliance with the named technical or unified sanitary requirements. It does not authorise every possible use and does not replace medicinal-product or medical-device registration or other prescribed procedures. A laboratory report supports the decision; the authority makes the registration decision.

In practice

State legal basis, scope, applicant and deliverable explicitly in the quotation.

Legal foundations and source hierarchy

Distinguish two legal gateways to SGR.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Decision 299	28 May 2010: sanitary measures, product list and sanitary requirements.
Technical TRs	Product-specific registration requirements, e.g. 007, 009, 021, 044.
Decision 80	30 June 2017: unified certificate, rules and registry operation.
Decision 102	18 June 2019: amendment to Decision 80; not a separate product catalogue.
National procedure	Competent authority, filing, fees and administration.

Section I lists goods subject to sanitary supervision; Section II identifies goods subject to SGR under that list; Section III contains specific exclusions. As product-specific TRs entered into force, earlier Section II entries were removed. Do not classify foods, cosmetics or children's articles solely against a historical catalogue. Use the current text, amendments, commencement rules and transitions. The AC Inorms archive supports work in German; release decisions use the official original text.

In practice

Adoption decision, TR, amendment and test-method list are different documents.

Technical update: what applies now

Replace blanket statements with specific product rules.

Assessment area	Project implementation
Cosmetics	Covered Annex 12 categories only; otherwise normally declaration.
Children's articles	SGR for specified articles and ages only, sometimes plus declaration.
Validity	Distinguish the 299 sanitary route, general TR rule and food exception.
Audit	No automatic on-site audit duty in every SGR procedure.
Date	Decision 102 is dated 18 June 2019, not 18 July 2019.
Timing	Separate project duration from the official processing period.

The sector-page content has been reviewed and technically corrected at these points. Its simultaneous references to “unlimited” and “1 to 5 years” are not universal SGR rules. Decision 114/2024 introduced new cosmetics procedures and five-year certificates under 1p/2p; assess older evidence against transitions. Decision 74/2025 generally becomes effective only on 28 October 2026, with one provision on 1 January 2027. TR EAEU 053/2026 for paints and varnishes has been adopted, but its product requirements are not yet applicable as of this handbook.

In practice

Do not invalidate existing SGR solely because a legal text changed: assess transitions and registry status.

Current product list under Decision 299

Section II now contains targeted product categories.

Assessment area	Project implementation
Item 6	Covered disinfectants, insect-control and rodent-control products.
Item 7	Household chemicals.
Item 8	Specified potentially hazardous chemical/biological substances and preparations.
Item 9	Materials and technical means for drinking-water treatment.
Item 10	Adult personal hygiene articles; covered oral-hygiene articles.
Item 11	Covered food-contact articles with express exclusions.

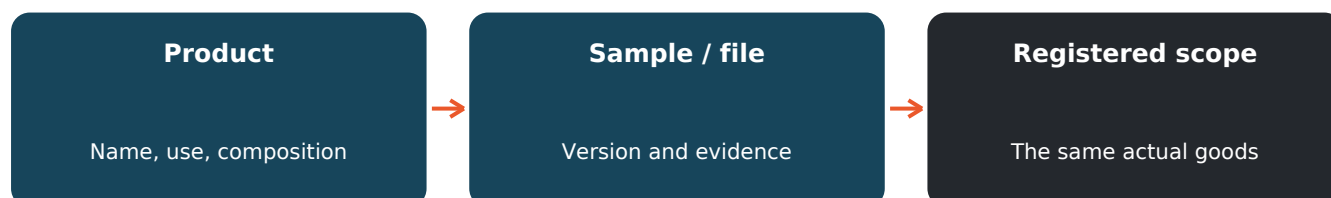
Assess current Items 6-11 together with the TN VED headings named in Section II. Intended use and customs heading must meet the respective listing rule. Medicines and pesticides are expressly excluded from Item 8; Item 6 has its own exclusions. Cosmetic oral-hygiene products under TR CU 009/2011 are not reclassified solely through Item 10. The current list incorporates the oral-hygiene articles added in 2024. Later chapters show how a TR can require registration even where Section II does not cover the product.

In practice

This overview does not replace a complete heading and exclusion assessment.

Product classification and TN VED codes

Assess product description and customs code together.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Function	Main purpose and actual use conditions.
Users	Adults, children, age and specific populations.
Composition	Substances, concentrations, materials and coatings.
Presentation	Label, advertising, instructions and presentation.
Tariff	Check the ten-digit EAEU code and wording of the heading.

Do not automatically treat an EU HS or CN code as the final EAEU code. A proposed code assists assessment but does not establish SGR duty or exemption alone. “Ex” headings cover only the goods specifically described. A manufacturer letter can substantiate intended use and must agree with labels, contracts and actual use. Assess changes in raw-material grade, users or claims before reusing a classification. Record legal reference, product characteristics, code, exclusions and remaining conformity duties.

In practice

A documented classification prevents unsuitable sample and test orders.

Which technical regulations matter

The legal matrix follows the product; the archive is a navigation aid.

Sanitary SGR

Decision 299

TR registration

Product-specific SGR

Other evidence

Declaration, marking

Product-specific decision · schematic explanation

Assessment area	Project implementation
TR CU 007/2011	Specified children's/adolescent articles; SGR sometimes followed by declaration.
TR CU 009/2011	Cosmetics: SGR for Annex 12, otherwise declaration route.
TR CU 021 / 027	Specialised and novel foods; specific nutritional uses.
TR EAEU 044/2017	Specified children's water and medicinal/medicinal-table mineral water.
TR CU 005 / 022 / 029	Packaging, food labelling and additives as interfaces.
TR EAEU 041 / 053	Assess chemical-regulation developments and future paints rules separately.

Not every regulation in the archive applies to an SGR project. TR CU 010/2011, 004/2011, 020/2011 or 032/2013 can additionally apply to technical plants, for example drinking-water treatment. SGR then assesses hygienic use while other TRs address mechanical, electrical or pressure hazards. A packaging declaration under TR CU 005/2011 does not register the contents. Food registration likewise does not register every production machine. Define a specific subject and separate evidence decision for each outcome.

In practice

One row per item: legal basis, evidence, marking and responsible person.

Cosmetics: which categories require SGR

Annex 12 and actual use determine the route.

Assessment area	Project implementation
Skin uses	Self-tanning, skin-lightening, intimate cosmetics and specified skin protection.
Children / family	Children's cosmetics and family cosmetics also intended for children under 14.
Hair	Chemical colouring, bleaching, highlighting, waving and straightening.
Other categories	Tattoo cosmetics, nanomaterials, depilation and peels.
Oral care	Covered fluoride and tooth-whitening products under Annex criteria.

This overview assists classification rather than granting blanket approval. Fluoride products use the Annex concentration thresholds; tooth whitening depends on hydrogen peroxide or releasing ingredients and their concentrations. Decision 114/2024 expressly added family cosmetics intended also for children under 14. A family claim on the label can therefore affect the conformity route. Tattoo products applied by breaking the skin barrier fall outside the updated cosmetics scope and need separate assessment. Ordinary perfume or an adult moisturiser is not subject to SGR simply because it is a cosmetic.

In practice

Fix users, application method and claims before testing and label printing.

Cosmetics: the new SGR schemes 1p and 2p

Place of manufacture determines the registration procedure.

EAEU manufacture

Scheme 1p

**Third-country
manufacture**

Scheme 2p

Shared outcome

New SGR: five years

Product-specific decision · schematic explanation

Assessment area	Project implementation
Scheme 1p	Manufacture within the EAEU; manufacturer or authorised representative.
Scheme 2p	Manufacture outside the EAEU; authorised representative or importer/seller.
Product control	Document identity, sampling and manufacturing compliance.
Reports	Registration tests/assessments obtained no more than one year before application registration.
Validity	SGR under 1p/2p: five years; assess changes and transitions.

The Russian original uses “1p” and “2p”; this handbook transliterates them as 1p/2p. They are not declaration schemes 1d/2d. Decision 114/2024 generally applies from 24 December 2025, with individual provisions from 1 July 2026 or subject to specific conditions. The dossier includes formula information, specification, labelling, tests or permitted toxicological assessments, and manufacturing and claim evidence. Manufacturing GMP can be substantiated through the documents permitted by the regulation; this does not automatically require a particular paid audit package. Assess older SGR under the associated transitions.

In practice

For European manufacture, assess Scheme 2p and applicant eligibility first.

Specialised foods and SGR

Intended use triggers a specific assessment route.

Assessment area	Project implementation
Children's nutrition	Covered infant/children's foods, including specified water products.
Dietary purposes	Therapeutic and preventive nutrition under statutory characteristics.
Specific users	Covered sports nutrition and foods for pregnant/lactating women.
Supplements	Biologically active food supplements as a specific category.
Regulations	TR CU 021/2011; additionally 027/2012 and applicable sector rules.

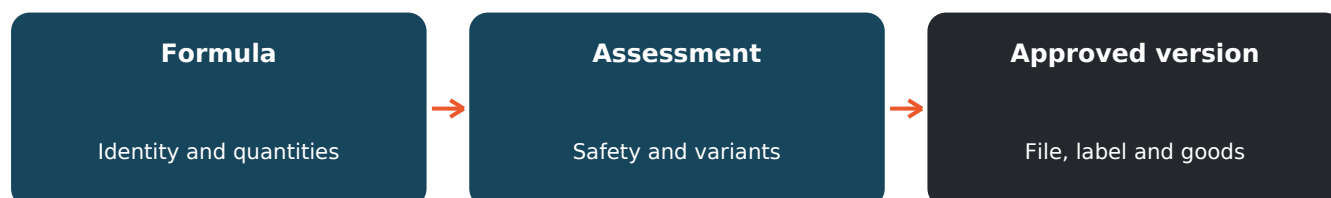
Articles 24-26 of TR CU 021/2011 govern specialised-food registration. Register before ordinary import or while preparing manufacture within the Union. Under Article 24(5), registration has no fixed expiry but can be suspended or terminated for non-compliance. For covered foods, SGR replaces the declaration route specified there; do not demand an additional declaration for the same product without a legal basis. Labelling, additives, packaging and any veterinary requirements still need review. Marketing terms such as “diet”, “protein” or “for athletes” do not replace legal classification.

In practice

Assess purpose, users and daily intake alongside formula and labelling.

Food supplements: formula and daily intake

Ingredients and dosage require defensible evidence.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Identity	Distinguish supplement, food and medicinal product.
Formula	Record active substances, carriers and excipients quantitatively.
Botanicals	Botanical name, plant part, extraction and standardisation.
Dosage	Daily portion, users, warnings and contraindications.
Quality	Contaminants, microbiology, stability and packaging interaction.

An EU marketability document or national notification may support the evidence but does not replace EAEU registration. State quantities per unit and per recommended daily portion. A trade name alone is insufficient for botanical extracts; solvent, extraction ratio, markers and possible residues matter. Review prohibited source materials and restrictions under TR CU 021/2011 plus applicable sanitary requirements. Treatment or cure claims may place the product outside the food category. Acceptance of one ingredient does not authorise every dose or combination.

In practice

Archive the registered formula as a controlled version.

Novel and genetically modified products

First import is not the same as statutory novelty.

Assessment area	Project implementation
Novelty	Assess characteristics under TR CU 021/2011, Articles 27-29.
Technology	New processes, modified structure or new source materials.
Safety data	History of use, composition and exposure assessment.
GMOs	Food requirements and any additional national rules.
Labelling	Assess applicable mandatory particulars under TR CU 022/2011.

Ordinary food does not become novel solely because it is first imported into Russia or another member state. Statutory product characteristics determine novelty. Novel foods have a separate registration and registry route and must not be confused with specialised-food registration. For genetic engineering, identify source organisms, processes and product identity unambiguously. “All GMOs need the same SGR” is insufficient. Assess Union law, actual food type and relevant national rules before marketing. EU approvals may supply safety data but do not automatically authorise EAEU marketing.

In practice

Document the novelty assessment as a separate decision.

Packaged drinking water and mineral water

Not every bottled water requires SGR.

Assessment area	Project implementation
SGR categories	Children's drinking water and natural medicinal/medicinal-table mineral water.
Other water types	Normally declaration under the applicable category.
Identity	Source, treatment, composition and packaging.
Specific evidence	Substantiate medicinal/preventive properties for covered medicinal water.
Methods	Current methods list; take account of the 2026 amendment.

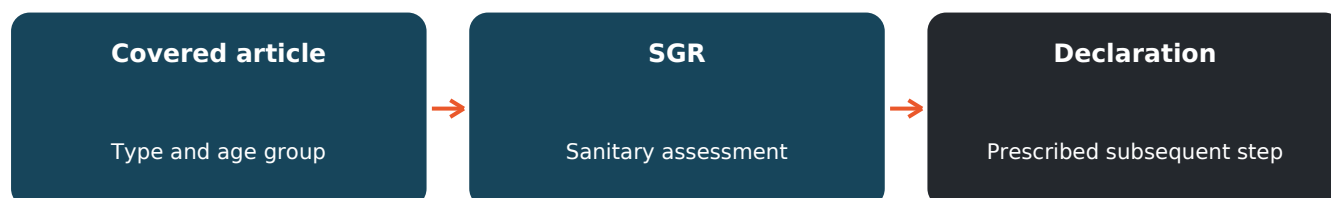
TR EAEU 044/2017 establishes the product-specific route and refers SGR to the food-registration procedure under TR CU 021/2011. Origin and mineral content alone do not establish a medicinal-water designation. Substantiate composition, intended use and required special properties. The assessment plan covers microbiological and chemical characteristics, actual packaging and shelf life. On 31 March 2026 the EEC announced an update of the test-method list; assess applicable editions and transitions before commissioning tests. Drinking-water treatment equipment is a separate subject addressed on page 21.

In practice

Determine the water category in writing before selecting the conformity route.

Children's articles: SGR followed by declaration

Age, article type and skin contact are decisive.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Covered articles	Specified hygiene, care and clothing articles under TR CU 007/2011.
Under three	Covered underwear, first-layer knitted articles and other named items.
Other products	Specified pacifiers, bottle teats, hygiene articles and children's utensils.
Evidence sequence	For covered groups: SGR first, then declaration of conformity.
Footwear / toys	Separate routes; no blanket SGR for all children's shoes or toys.

Article 12 of TR CU 007/2011 names the actual scope. Assess the complete article list, materials and age limits for the portfolio. "Children's clothing" is insufficient: first, second and third layers have different conformity routes. For specified registration categories, SGR is only the first step; register the prescribed declaration afterwards. Toys under TR CU 008/2011 are not automatically assessed under the children's-articles regulation. Age statements must agree throughout the dossier, samples, label and quotation. Relabelling for an older age must not conceal actual intended use.

In practice

Complete both required evidence stages before EAC marking.

Household chemicals and hygiene products

Purpose and composition define the registration scope.

Assessment area	Project implementation
Household use	Describe cleaning, washing and maintenance use precisely.
Formula	Surfactants, solvents, active substances, fragrances and preservatives.
Application	Concentrate, working solution, surfaces and exposure.
Hygiene articles	Covered adult articles under Section II Item 10.
Oral hygiene	Distinguish cosmetic products under TR 009 from other covered articles.

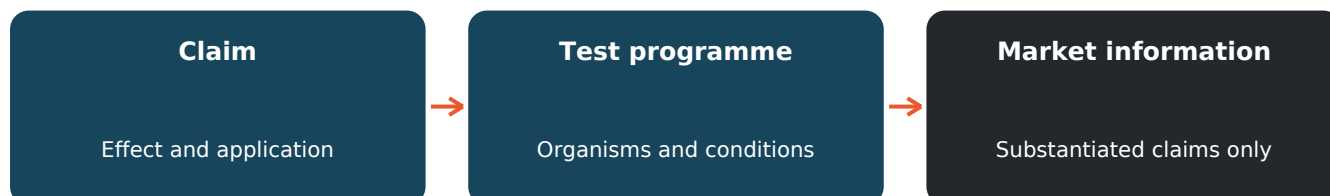
An industrial degreaser is not classified as a household cleaner solely because its ingredients are similar. Assess intended users and use, labelling and sales format together. For solid hygiene articles, focus on materials, skin or mucosal contact and relevant microbiological properties. Account for the extension to oral-hygiene articles outside TR CU 009/2011. Disinfection claims additionally require assessment against Item 6. A favourable result for a diluted cleaner does not automatically justify registration of a more concentrated product.

In practice

Record cleaning and disinfection claims separately.

Disinfectants and pest-control products

Efficacy claims require matching evidence.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Scope	Assess Section II Item 6 and its exclusions.
Actives	Document identity, concentration, purity and secondary ingredients.
Efficacy	Target organisms, concentration, contact time and application.
Safety	Toxicology, exposure, storage and protective measures.
Records	Consistent label, use instructions and test report.

A product may be intended for households, institutions or specified technical uses; registration must cover that use. The list expressly excludes certain veterinary, agricultural or dermatological-PPE uses. Exclusion does not establish general freedom from approval. EU biocide evidence can provide technical information but does not replace the competent EAEU decision. The test programme follows the precise efficacy claim. Bactericidal, virucidal and fungicidal claims differ; evidence at one test concentration does not automatically cover every dilution. Approve safety and efficacy records together.

In practice

Do not claim effects on labels or websites that the evidence does not support.

Hazardous substances, preparations and fertilisers

A substance group has no single blanket conformity route.

Assessment area	Project implementation
Item 8	Covered hazardous chemical/biological substances and preparations.
Exclusions	Medicines and pesticides are expressly excluded there.
Substance data	CAS/EC identity, purity, mixture and impurities.
Use	Industrial, household, agricultural or exclusively as a source material.
Fertilisers	Assess product characteristics and applicable law, including TR EAEU 039/2016.

A hazard-classified safety data sheet alone does not establish SGR duty under Item 8. Assess listing criteria, TN VED heading, purpose and exclusions. Organic, mineral and microbiological fertilisers, plant-protection products and soil improvers are not interchangeable categories. Mineral fertilisers may be subject to a separate sector framework; establish current applicability and national requirements for the actual product. REACH or CLP records support substance identity and safety assessment but are not EAEU registration evidence. Assess the possible raw-material exclusion on page 25 separately.

In practice

Always provide complete mixture composition and precise use.

Drinking-water treatment and contact materials

Assess hygienic use and technical risks separately.

Sanitary purpose

Drinking water and materials

Technical hazards

Mechanical, electrical, pressure

Plant release

All applicable evidence

Product-specific decision · schematic explanation

Assessment area	Project implementation
Scope	Covered materials, equipment and technical means under Item 9.
Water contact	Materials, coatings, seals, resins and filter media.
Conditions	Temperature, flow, contact time and cleaning chemicals.
Sanitary testing	Migration, water quality and use-specific safety.
Other TRs	Machinery, electrical safety, EMC and pressure equipment where applicable.

Item 9 covers technical means intended for domestic and drinking-water supply systems. Treatment intended exclusively for industrial process water is not automatically registered under this item merely because water contact occurs. Intended use must agree with operator records and contract. For an assembly, identify sanitary-relevant parts and actual registered system scope. Evidence for a filter medium does not register every plant using it. Conversely, SGR does not replace applicable EAC assessment of mechanical, electrical or pressure hazards. Assess material changes hygienically and technically before supply.

In practice

A material and system matrix connects sanitary evidence with plant conformity.

Food contact: observe the exclusions

Food contact does not automatically trigger SGR.

Assessment area	Project implementation
Item 11	Covered food-contact articles under the current list.
Exclusions	Distinguish the express exclusions for table/kitchenware, cutlery and kitchen accessories.
Other exclusions	Technological equipment and packaging, including closures.
Other routes	Packaging TR, children's-articles TR or other rules may apply.
Test conditions	Food type, contact time, temperature and repeated use.

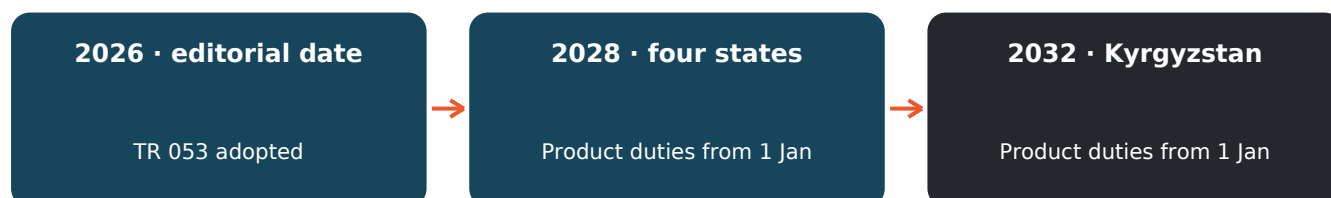
The current Decision 299 list contains specific exclusions that must be assessed under Item 11. An exclusion does not generally exempt a product from sanitary safety. Packaging may require declaration under TR CU 005/2011; specified children's utensils may require SGR and declaration under TR CU 007/2011. Migration tests must represent actual use. A material report for brief cold contact does not automatically cover hot, fatty foods or repeated use. An EU food-contact declaration may provide technical data but is not automatically accepted for SGR.

In practice

Determine article type before relying on the general description "food contact".

Paints and varnishes: new TR EAEU 053/2026

Adoption and commencement of product duties are different dates.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Adoption	Decision No. 65 of 20 May 2026; TR EAEU 053/2026.
Start in 2028	Armenia, Belarus, Kazakhstan and Russia: 1 January 2028.
Start in 2032	Kyrgyzstan: 1 January 2032.
Future evidence	State registration; certificate normally valid for five years.
Scope	Named paints, varnishes, primers and other covered materials.

As of 11 October 2026, future product duties under this TR are not applied as current approval prerequisites. Continue assessing existing product-list, sanitary and national requirements for present shipments. Not all building materials or coating raw materials are covered: cosmetic varnishes, specified resins, solvents and hardeners are among express exclusions. The future framework sets its own safety, labelling, SDS and registration duties. Assess separate dates and conditions for individual provisions, including lead requirements. Review existing SGR for later shipments under the applicable transitions.

In practice

Plan an additional transition assessment for projects extending beyond 2028.

Chemicals: TR EAEU 041/2017 and status review

Do not confuse a separate framework with present sanitary SGR.

Assessment area	Project implementation
Regulation	TR EAEU 041/2017: safety of chemical products.
Second-level rules	Decision 61 of 1 August 2025 on substances/mixtures register and notification.
Conditions	Important provisions depend on further legal acts and system processes.
SGR under 299	Assess existing sanitary registration and exclusions separately.
Project release	Record current official commencement status before quotation and import.

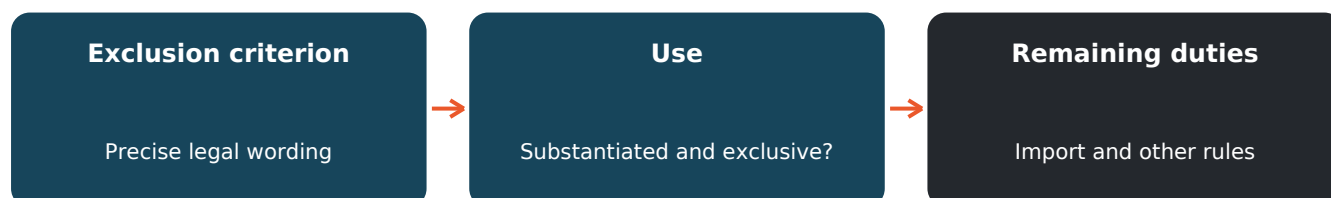
The original 2 June 2021 date was conditional and must not be treated without review as effective commencement of all chemicals duties. Decision 61/2025 generally entered into force on 11 October 2025; central register and notification provisions expressly have deferred conditions. Adoption therefore does not create a blanket new SGR duty for every mixture. The official sources reviewed here do not establish unconditional general commencement of all TR 041 product procedures as of the editorial date. Offer registration under this framework only after confirming current legal and procedural status. REACH, substance inventories and sanitary SGR are separate evidence.

In practice

Chemicals quotations include documented legal status and the procedure actually available.

Exclusions: raw materials, samples and special uses

Substantiate exclusions; they do not permit arbitrary relabelling.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Raw materials	Specified source materials intended exclusively for named manufacturing uses.
Test samples	Samples for sanitary examination to obtain SGR.
Laboratory use	Specified laboratory reagents and articles under Section III.
Other exclusions	Assess wording, subject and purpose of each exclusion.
Limits	Other technical, customs and national requirements may remain.

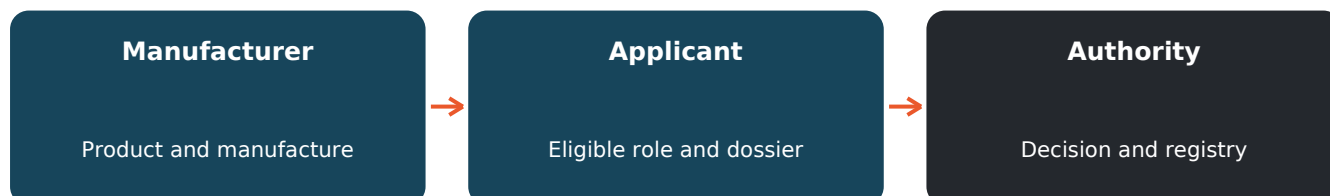
The Section II raw-material rule concerns exclusive manufacture of named cosmetics, household chemicals, plant-protection, disinfection and pharmaceutical products, among others. It does not exempt all raw materials. Substantiate purpose and use through manufacturer information, supply contract and product description. Section III permits specified testing and special uses, not unrestricted sale of imported samples. Reassess exclusions for dual use, resale as a finished product or changed claims. An exemption or information letter can document classification but cannot replace mandatory registration. Match actual import arrangements to the applicable exclusion before shipping.

In practice

Document sample status, quantity, recipient and assessment purpose together.

Manufacturer, applicant and authority

Define regulatory roles and contractual tasks clearly.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Manufacturer	Formula, specification, factories and manufacturing compliance.
Applicant	Eligible legal entity or individual entrepreneur in a member state.
Representation	Manufacturer authorisation and responsibility under the actual procedure.
Laboratory	Eligible accredited examination within the recognised scope.
Authority	Review, decision, issuance and registry status.

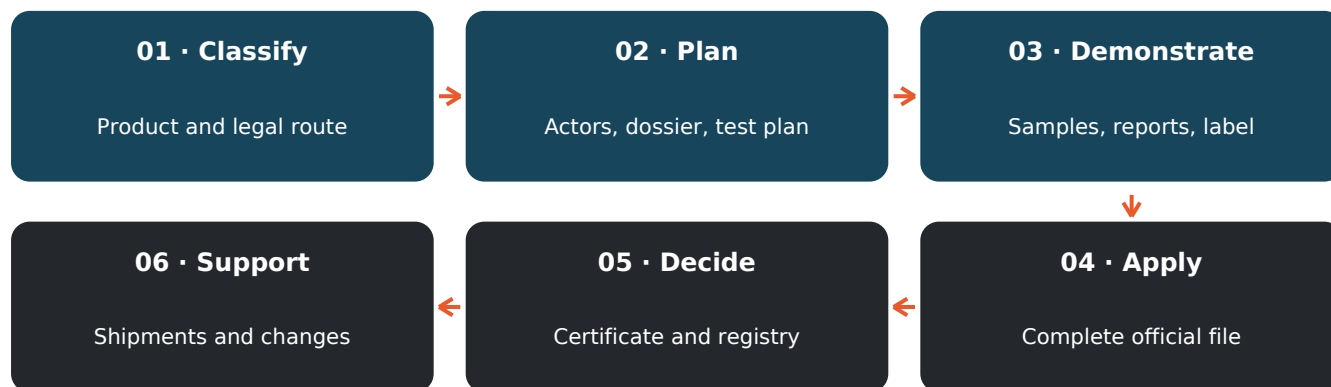
Decision 80 identifies manufacturers, sellers/importers and manufacturer-authorised representatives registered in a member state as applicants. Product-specific TRs can restrict roles further; cosmetics use Scheme 1p/2p rules. A German manufacturer therefore needs a suitable local actor. Applicant status does not automatically create commercial distribution exclusivity. Define dossier access, authority communication, change notification, archiving and responsibility contractually. Product identity and lawful registry scope remain decisive after a representative change. A service provider coordinates the project but does not replace the competent public authority.

In practice

Identify representative, importer, brand owner and actual manufacturer unambiguously.

Workflow and release milestones

Resolve dependencies before sample transport and filing.



Assessment area	Project implementation
01 · Classify	Product, legal basis and required conformity evidence.
02 · Plan	Applicant, authority, laboratory, test plan and document list.
03 · Demonstrate	Formula, samples, tests, label and manufacturing evidence.
04 · Apply	Submit a complete and consistent dossier.
05 · Decide	Official review, SGR and registry entry.
06 · Support	Shipment, changes, status checks and market monitoring.

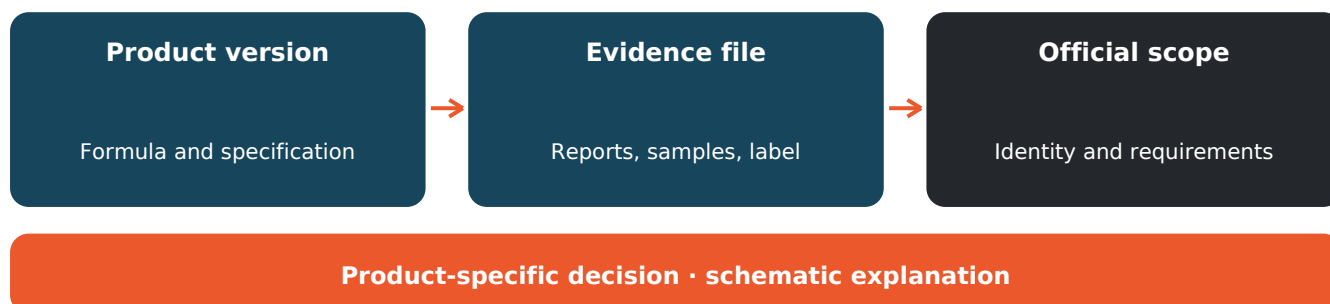
Complete product-specific assessment planning before committing to samples. Label and formula work can proceed in parallel if approved versions are clear. Reports must match the submitted product version. Questions, missing certification of documents or untraceable sampling can delay the official decision. After issuance, reconcile registry status with the complete certificate and attachments. Children's articles may then need a declaration; final marking and shipment release follows completion of all stages. A quoted processing period does not automatically start with the first email.

In practice

Maintain four statuses: dossier complete, tests passed, SGR active, shipment released.

The complete registration dossier

The document list depends on product and origin.



Assessment area	Project implementation
Identification	Names, variants, presentations, manufacturer, factories and applicant.
Technical basis	Specification, formula, materials and manufacturing process.
Consumer information	Label, use, warnings, storage and shelf life.
Safety	Test reports, assessments and SDS where applicable.
Origin / samples	Manufacturer declarations, quality evidence and sample-import records.
Formalities	Application, powers, agreements, translations and required certification.

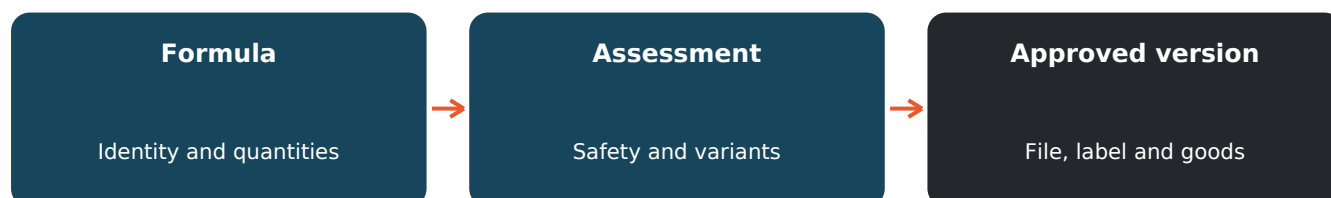
Decision 80 distinguishes TR-registration records from those for unified sanitary requirements. Foreign manufacture may require manufacturer quality/safety records, free-sale evidence where relevant or a permitted alternative manufacturer document. An SDS is not a universal mandatory record for every food or solid children's article. Determine declarations, originals and certified copies before filing. Give the file a contents list and version status. Substantiate every registration statement in source records; general company brochures do not replace quantitative composition or product specification.

In practice

Before submission, reconcile each document with product name and approved version.

Composition, variants and confidentiality

A commercial family is not automatically a testing or registration family.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Completeness	Total, substance identity, concentration and function of all components.
Specific traits	Nanomaterials, botanicals, impurities and restrictions.
Variants	Compare fragrance, colour, active, dosage and presentation.
Grouping	Same manufacturer, requirements and relevant sanitary properties.
Confidentiality	Define transfer, access and permitted authority/laboratory use.

Decision 80 generally permits certain products from one manufacturer to be listed together where technical and sanitary foundations agree. This does not allow arbitrary grouping of formulations. Assess differences for safety and use and confirm the eligible product group. Broad concentration ranges can be insufficient for test planning. Brand owners need access to actual manufacturer data, including private-label supply. Public registry information covers identity and evidence; do not describe complete confidential formulas as universally public. Establish which data are visible and which records are filed confidentially with the authority.

In practice

A formula change triggers technical change assessment before further supply.

Specification and safety data sheet

SDS, formula and specification serve different purposes.

Assessment area	Project implementation
Specification	Identity, properties, quality limits and assessment characteristics.
SDS	Hazards, safe handling, storage and emergency information.
Formula	Complete composition; SDS often contains only partial information.
Manufacturing basis	Standard, technical specifications or approved manufacturer records.
Consistency	Product name, revision, properties and intended use.

Assess a European SDS against the required language, format and national or Union rules. Hazard statements must agree with formula and label. Do not treat it as a substitute for toxicological testing or as full disclosure of all ingredients. Foods or solid articles may use other safety/quality records. Specifications describe actual presentation, relevant physical/chemical properties, quality limits and shelf life. Track changes through version number and approval date. Do not replace a missing local standard number with an invented GOST reference.

In practice

Maintain SDS, formula and specification as three controlled documents.

Label, claims, language and EAC mark

Labelling follows the applicable legal basis.

SGR

Registered product scope

EAC

Only under applicable TR

National codes

Additional market duty

Product-specific decision · schematic explanation

Assessment area	Project implementation
Identity	Match name and variant to SGR, formula and commercial records.
Use	Users, instructions, warnings, storage and shelf life.
Actors	Identify manufacturer and responsible local actors correctly.
Language	Russian and any additionally required national language.
EAC	For TR products, only after all applicable procedures; 299 alone does not justify EAC marking.

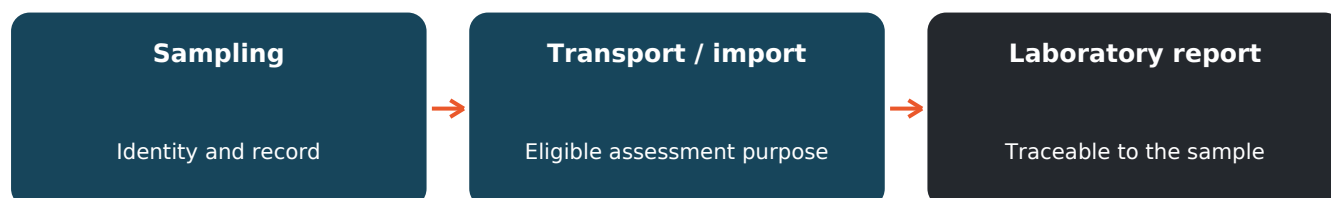
Sanitary registration under Decision 299 does not independently permit EAC marking of every product. For cosmetics, registered foods or children's articles, marking follows the relevant TR and all other applicable requirements. Use the official EAC artwork; the minimum base size is five millimetres. Claims on packaging, leaflets, web shops and advertising require suitable evidence. Review translations technically: dosage, users and warnings must retain their meaning. Assign the approved print file an unambiguous version and review it before series production.

In practice

SGR number, EAC mark and national digital marking are separate particulars.

Samples, sampling and import evidence

The tested sample must match the goods later supplied.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Selection	Representative variants under the confirmed test plan.
Identification	Name, formula version, batch, date, factory and packaging.
Sampling	Eligible actor, location and traceable sampling record.
Transport	Quantity, shelf life, dangerous goods and temperature conditions.
Import	Assessment purpose and lawful sample-import records.

Eligible sampling depends on legal basis and scheme. Do not treat arbitrary samples as identical commercial goods. The sampling record connects the sample to the manufacturer version and tested product. For foreign manufacture, required import records form part of the file. The examination-sample exclusion does not remove transport/customs formalities or permit sale. Before shipping, agree laboratory address, quantity, reserves, packaging, shelf life and any cold chain. An unopened original pack supports identification but does not replace prescribed sampling records.

In practice

Ship samples only after identity, test plan and import route are approved.

Laboratory and recognised test methods

Accreditation must cover the actual test assignment.

Assessment area	Project implementation
Status	Current accreditation and required registry inclusion.
Scope	Product matrix, measurands and specific methods.
Test plan	Requirements, limits, method edition and assessment.
Report	Sample identity, results, units and clear conclusion.
Age	Applicable validity and currency rules of the actual procedure.

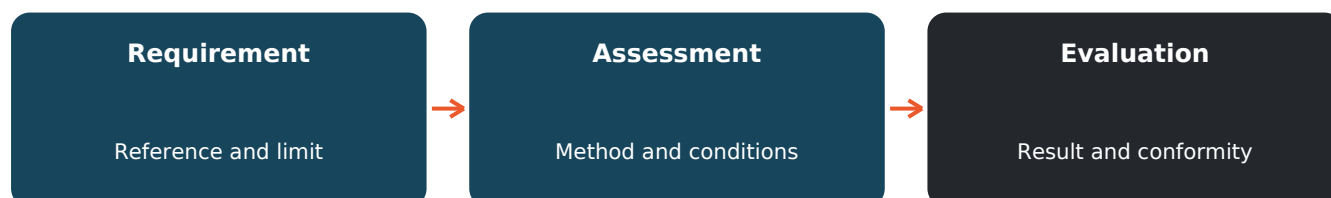
An accredited laboratory is not automatically eligible for every food, cosmetic or chemical examination. Check its scope and any required inclusion in the unified EAEU register. Standards lists specify required or recognised methods; an obsolete edition may trigger additional testing. Review EU reports for content and admissibility rather than accepting them generally. The new cosmetics procedures impose specific one-year currency requirements for registration reports. Report validity is not SGR validity. Maintain laboratory results separately from the official registration decision.

In practice

The laboratory quotation states product, method, accreditation and usability for the planned procedure.

Test programmes by product group

Derive limits and test conditions from the legal basis.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Cosmetics	Microbiology, physical/chemical characteristics, toxicological/clinical assessment.
Foods	Contaminants, microbiology, composition and specific nutritional characteristics.
Chemicals	Hazards, exposure and product-specific sanitary characteristics.
Disinfection	Additionally efficacy for the named organisms and application.
Materials	Migration and safety under intended contact conditions.

The table describes assessment areas rather than a universal mandatory checklist. The actual programme gives the legal reference, method, unit, permissible limit and sample allocation for each parameter. Account for matrix effects, detection limits and actual use concentration. Use alternative toxicological assessment only where the applicable regulation permits it; an EU safety opinion does not automatically replace the required assessment. Investigate negative results before retesting. Formula changes, additional cleaning or removing a variant must be reflected in the revised product identity. A “passed” report without traceable results is not defensible registration evidence.

In practice

Connect requirement, method, result and conclusion in one assessment matrix.

Manufacturing, GMP and the audit question

Manufacturing compliance is required; its evidence route is product-specific.

Assessment area	Project implementation
Stability	Approved formula, materials and repeatable manufacture.
Quality	Incoming checks, hygiene, process limits and final release.
GMP / HACCP	Cosmetics GMP or food HACCP procedures appropriate to the product.
Evidence	Permitted manufacturer declaration, system/manufacturing evidence or other records.
Audit	Where the actual rule or substantiated procedure planning requires it.

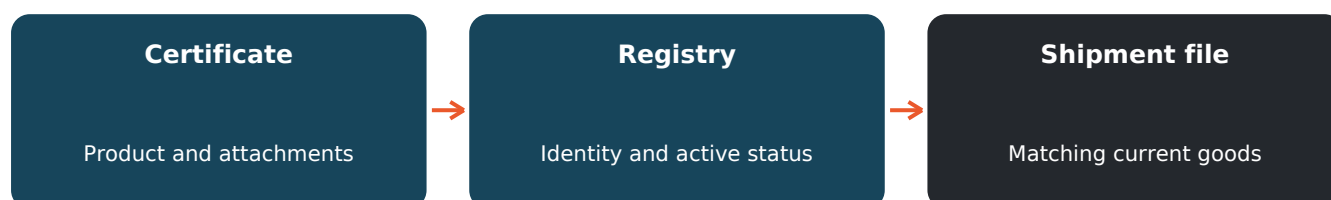
The sector page lists a production audit as a general step. Professional planning makes this specific: not every SGR automatically requires an on-site inspection. The applicable legal basis determines required manufacturing declarations, records or assessments. The new cosmetics provisions describe permitted manufacturing-compliance evidence; foods require safety procedures based on HACCP principles. A voluntary audit can assess supplier quality but must not be presented as a mandatory authority demand where none exists. Test reports alone do not remove ongoing manufacturer conformity duties.

In practice

Distinguish legally required assessment from voluntary quality services in the quotation.

Official decision and certificate

Complete evidence includes certificate, attachments and registry status.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Decision	Competent authority evaluates complete records and assessment evidence.
Certificate	Unified form under Decision 80 as currently amended.
Content	Product, manufacturer, factory, applicant, requirements and evidence basis.
Format	Permitted paper or electronic certificate.
Attachment	Include additional names/variants and conditions completely.

Before approving an official draft, reconcile it with the product matrix and manufacturer data. Check spelling, factory addresses, presentations, consumer purpose and report references. An electronic certificate is not invalid merely because it lacks paper embossing; verify provenance and registry entry. Conversely, an attractive paper document does not establish active status. Correct errors through the eligible official procedure. A private translation does not replace the official original. Assess certificate reach again where products change after issuance.

In practice

Archive all attachments with the official original and status evidence.

Validity: distinguish three legal cases

Both unlimited validity and five years can be correct.

299 sanitary route

Manufacture / import /
sell-through

General TR rule

Five years unless otherwise

Food-specific rule

Article 24: no fixed expiry

Product-specific decision · schematic explanation

Assessment area	Project implementation
Unified sanitary rules	Under Decision 80 generally throughout manufacture/import and complete sell-through.
General TR rule	Under Decision 80 five years unless the TR provides otherwise.
Specialised foods	TR CU 021/2011 Article 24(5): registration without fixed expiry.
New cosmetics procedures	SGR under 1p/2p: five years; older evidence follows transitions.
Status / changes	Suspension, termination and formula/scope changes remain relevant.

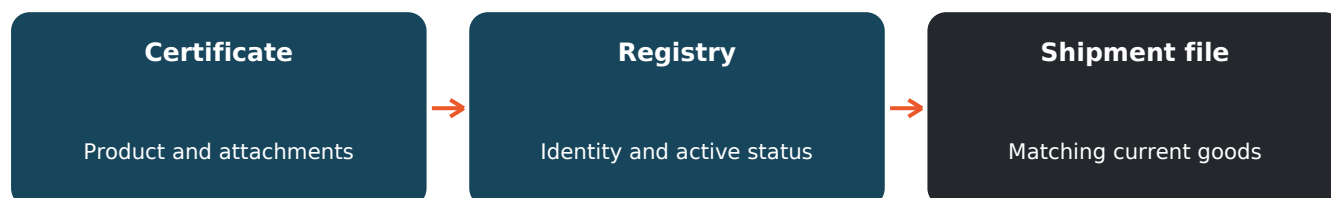
SGR validity is not freely selected as a general certificate period of one to five years. It follows the legal basis and actual certificate. “Unlimited” does not mean an unrestricted formula scope or protection against official suspension. For time-limited TR evidence, distinguish manufacture, placing on the market and shelf-life rules; Decision 80 sets rules unless the TR provides otherwise. Continuing sale of goods already lawfully marketed does not automatically authorise new imports. The expiry of a test report is also not the expiry of SGR.

In practice

Connect legal basis, validity, product version and current status in the project register.

Registers and authenticity checks

A number is insufficient: identity and status must agree.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Access	EEC directory for the unified register and national registry sections.
Search data	Number, date, manufacturer, applicant and product name.
Scope	Presentation, variants, factory, requirements and attachments.
Status	Active, suspended, resumed or terminated.
Evidence	Retain the reviewed entry and complete records in the shipment file.

The unified register is built from national sections; the issuing authority is responsible for its entries. A technical access failure proves neither validity nor invalidity. For missing results, check number, spelling and relevant national section; seek confirmation from the issuing authority if necessary. Public information does not mean every confidential dossier record is published. Recheck status before significant shipments and after notified changes. Evidence for a similarly named article or another manufacturer does not substitute for evidence covering the actual goods.

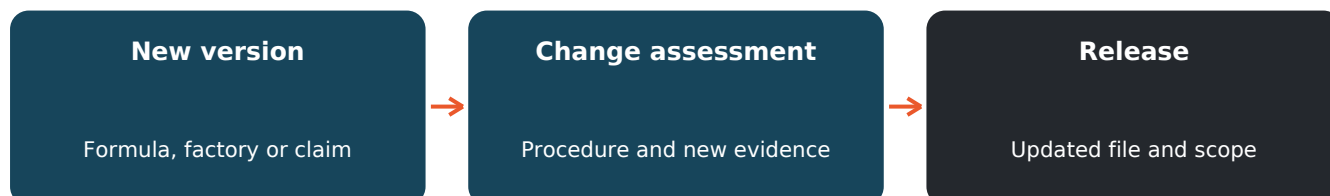
Registry access: [unified SGR registry](#) and [official directory of national registries](#).

In practice

Registry review is a recurring release step rather than a one-off quotation formality.

Changes, replacement and new registration

Assess changes before implementation.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Formula	New components, concentrations, raw-material grade or impurities.
Manufacturing	Factory, process, supplier or critical cleaning.
Presentation	Name, brand, users, claim, packaging or dosage.
Actors	Manufacturer/applicant particulars or authorised representative.
Decision	Records, permitted replacement, further tests or new registration.

Do not treat a purely administrative change like a safety-relevant formula change. Decision 80 and product TRs determine permitted correction/replacement and grounds for suspension or termination. New cosmetics rules contain specific provisions for formula changes where safety characteristics remain unchanged; still obtain the required records and decision. A manufacturer's own PDF addendum does not expand the official certificate. Do not supply the changed variant as already registered goods until release is resolved. Version history connects old/new formula, justification, tests and official decision.

In practice

Use a change form approved by the product owner and applicant.

Import, distribution and EAEU recognition

Assess Union-wide effect and national market duties separately.

Assessment area	Project implementation
Reach	Valid Union-law SGR is used throughout the Union within its scope.
Shipment file	Certificate, attachments, status, commercial and transport records.
Product match	Goods, names, factory and registered version.
Local duties	Language, digital marking, import formalities and distribution.
Other evidence	Required declaration, packaging or other product evidence.

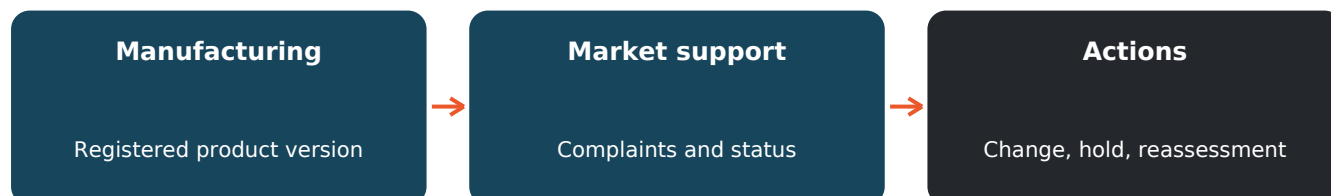
A valid EAEU SGR does not generally require a new application in every member state. Nevertheless, it is not complete customs-clearance or distribution permission. National marking systems, mandatory languages and additional import conditions depend on goods and destination. Foods may additionally require veterinary or phytosanitary controls. Assess trade/export restrictions separately for product, recipient and destination. “SGR available” does not replace that assessment. For new distributors, verify that the supplied goods are the registered product and required evidence and labelling records are available.

In practice

Do not offer a national registration outside the Union procedure as EAEU SGR without assessment.

Market surveillance and ongoing support

Conformity remains an ongoing responsibility after registration.



Product-specific decision · schematic explanation

Assessment area	Project implementation
Manufacturing	Maintain registered product version and quality controls.
Complaints	Record adverse effects, quality defects and misuse.
Status	Track suspension, resumption or termination in the register.
Actions	Shipment hold, root-cause analysis and required authority communication.
Archive	Traceable dossier, batch links, approvals and changes.

SGR is not evidence to reuse unchanged without support after issuance. The manufacturer ensures continuing conformity; the applicant performs procedural duties. State controls can identify non-compliance, inaccurate records or harmful effects and change status. There is no universal annual certificate inspection mandatory for every SGR in the manner of certain EAC series certificates. Nevertheless, plan product control and official supervision. Retention periods follow the legal basis and any national procedure; do not invent one period for all product groups.

In practice

Assign responsibility for registry status, changes and complaints.

Costs and realistic processing times

Project duration, testing time and authority period are different measures.

Assessment area	Project implementation
Website indication	AC Inorms indicates about 25 working days; not a universal official deadline.
Decision 80	Generally up to 30 calendar days after receipt of application and complete records, unless the TR provides otherwise.
Testing	Sample transport, examinations, assessments and report preparation.
Cost factors	Formulas, variants, assessment programme, translations and authority fees.
Ongoing costs	Changes, further tests, registry support and possible re-registration.

The official period is not the total time from project start. Classification, dossier, sampling and laboratory reports must first be available. Account for queries and product-specific rules in the actual schedule. The sector page gives no binding flat price; this handbook therefore does not invent one. A defensible quotation separates laboratory, sample logistics, documentation, translation, official fees, applicant service and optional tasks. Confirm scope and price after reviewing formulas and items. A low quotation must still cover every required evidence stage.

In practice

Timing confirmation states clear starting conditions and dependencies.

Worked case: three similarly marketed cleaning products

Intended use changes the conformity route.

A · household cleaner

Assess Item 7

B · disinfection

Item 6 and efficacy

C · exclusive raw material

Substantiate exclusion

Product-specific decision · schematic explanation

Assessment area	Project implementation
Product A	Household surface cleaner without disinfection claim: assess Item 7 and heading.
Product B	Marketed as disinfectant: assess Item 6, efficacy and exclusions.
Product C	Exclusively a raw material for named manufacturing: assess raw-material exclusion.
Shared file structure	Separate formula, purpose, claim, users and TN VED code per product.
Release	Do not derive evidence scope from similar names.

Assume three goods have comparable surfactants but differ in actual purpose. Product A is sold for household cleaning. Product B carries a disinfectant claim with defined contact time and needs matching assessment. Product C is supplied exclusively to a manufacturer as a source material for a finished product named in the raw-material rule. Its classification depends on substantiated exclusive use; simultaneous consumer sale would undermine that basis. For none of these products may the route be inferred solely from the SDS or shared brand name. The case demonstrates the method and does not approve an actual product.

In practice

Treat a claim change as a possible change of legal route.

Frequently asked questions and terminology

Brief answers to recurring project questions.

Does every cosmetic need SGR?

No. Registration categories are determined by Annex 12 of TR CU 009/2011. Other covered cosmetics normally follow the declaration route.

Is SGR always unlimited?

No. Sanitary SGR, the general TR rule and specific food rules differ. New cosmetics SGR under 1p/2p is valid for five years.

Is a laboratory report enough for import?

No. Where registration is mandatory, obtain the official decision and active registry scope. Additional evidence may be required.

Is a production audit always required?

No. The product rule and permitted manufacturing evidence govern. Identify voluntary auditing as an additional service.

Term	Meaning
SGR	State registration of an identified product.
TR CU / TR EAEU	Technical regulations of the Customs Union / Eurasian Economic Union.
TN VED	EAEU customs classification.
GMP / HACCP	Good manufacturing practice / food safety procedures.
Registry status	Current official status of the evidence.
Replacement	Permitted replacement of evidence; not unrestricted scope expansion.

Project release checklist

Printable worksheet for status, responsibility and open issues.

Checkpoint	Status / owner
Product / use / users	_____
Manufacturer and production sites	_____
Applicant and authorisation	_____
Formula / materials / version	_____
Legal basis / exclusions	_____
TN VED code and product description	_____
SGR scope and variants	_____
Sample identity and sampling	_____
Sample import and transport	_____
Laboratory / methods / report age	_____
Manufacturing / GMP / HACCP	_____
Label / language / claims	_____
Certificate and complete attachments	_____
Active registry status	_____
Other evidence and EAC release	_____
Import and national market duties	_____
Change procedure and archive	_____

Release rule

Mark each item complete, open or justified as not applicable. Record decision, evidence and date in the project file. Missing mandatory evidence prevents final shipment release.

Enquiry form for AC Inorms

These particulars enable a defensible initial classification.

Item	Your information
Company / contact person	_____
Manufacturer / factories / countries	_____
Product name / brands / variants	_____
Presentation / article type	_____
Intended use / users / age	_____
Formula / materials / revision	_____
Claims / efficacy statements	_____
Proposed TN VED / HS code	_____
Destinations / importer / applicant	_____
Series / quantity / planned shipment	_____
Shelf life / storage / transport	_____
Existing SGR / EAC / test reports	_____
GMP / HACCP / manufacturing records	_____
Planned formula or factory changes	_____

Attach product description, complete formula or material list, specification, SDS where relevant, draft label and existing evidence. Provide confidential data through the agreed secure channel.

Contact

inbox@ac-inorms.com · +49 2161 9904970

Classification precedes confirmation of evidence scope, cost and schedule.

Product and registration matrix

Use one row per item in the project file; two comparison columns are provided here.

Characteristic	Product A	Product B
Name / brand / variant	_____	_____
Manufacturer / factory	_____	_____
Presentation / pack size	_____	_____
Purpose / users / age	_____	_____
Formula version / material	_____	_____
Claim / daily dose / application	_____	_____
TN VED / product description	_____	_____
TR or Decision 299 reference	_____	_____
Exclusion / justification	_____	_____
SGR / scheme / applicant	_____	_____
Additional evidence	_____	_____
Sample / sampling / report	_____	_____
Label / language / version	_____	_____
Registry / status / validity	_____	_____
Changes needed / open issues	_____	_____
Shipment release / owner	_____	_____

Evaluation

Assess differences in formula, use, age and claims expressly. Group registration only where technical and procedural eligibility is confirmed.

Sources and regulations archive

Linked foundations for technical assessment and project planning.

[1] AC Inorms: state registration for EAEU states

[Open original source](#)

[2] AC Inorms: regulations archive

[Open original source](#)

[3] EEC: current Decision 299 product list, Sections I-III

[Open original source](#)

[4] EEC: unified sanitary requirements under Decision 299

[Open original source](#)

[5] EEC: Decision 80/2017, certificate, rules and register

[Open original source](#)

[6] EEC: TR CU 009/2011, cosmetics and amendments

[Open original source](#)

[7] EAEU: Decision 114/2024, new cosmetics procedures

[Open original source](#)

[8] EAEU: Decision 74/2025, start on 28 Oct 2026 and part on 1 Jan 2027

[Open original source](#)

[9] EEC: TR CU 021/2011, food and amendments

[Open original source](#)

The [regulations archive](#) provides German working versions, including TRs 007, 009, 021 and 044. Official original texts, amendments and transitions govern the actual decision.

Further sources and image credits

Linked foundations for technical assessment and project planning.

[10] EEC: TR CU 027/2012, specialised foods

[Open original source](#)

[11] EEC: TR EAEU 044/2017, packaged drinking water

[Open original source](#)

[12] EEC: TR CU 007/2011, children's/adolescent articles

[Open original source](#)

[13] EEC: TR EAEU 041/2017, chemicals and second-level rules

[Open original source](#)

[14] EAEU: Decision 61/2025, substances/mixtures register and notification

[Open original source](#)

[15] EAEU: Decision 65/2026, TR EAEU 053/2026 for paints/varnishes

[Open original source](#)

[16] EEC: SGR register and national sections

[Open original source](#)

[17] EEC: water test-method update, 31 March 2026

[Open original source](#)

[18] EAEU: Decision 711/2011, common EAC mark

[Open original source](#)

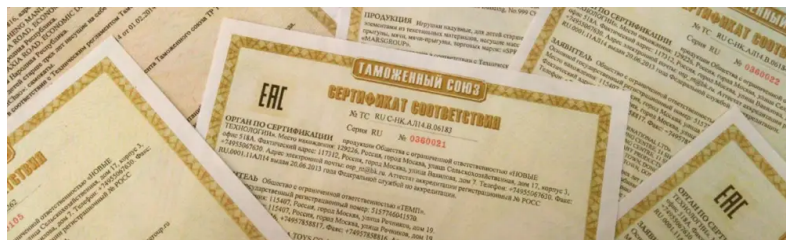
[19] EAEU: Decision 102 of 18 June 2019 amending Decision 80

[Open original source](#)

Image credits: care-products cover and EAC-document image from ac-inorms.com. All diagrams and worksheets are original explanatory material, not official forms. Editorial date: 11 October 2026. Authority links may change; review legal status and registry status again before actual project release.

Your SGR project with AC Inorms

From product classification to documented market release.



Product documentation and market access · Image source: AC Inorms

AC Inorms supports classification, route planning and coordination of required registration evidence. Product purpose, composition, manufacturing version and destinations form the basis. These identify dossier gaps, suitable assessment programme, eligible applicant and realistic workflow. Connect SGR with additional conformity, labelling and import duties. Ongoing support includes documented management of changes and registry status.

AC Inorms GmbH

Nobelstraße 3/5 · 41189 Mönchengladbach · Germany

Telephone: +49 2161 9904970

Email: inbox@ac-inorms.com

Web: ac-inorms.com

For your first contact

Use the enquiry form on page 46 and product matrix on page 47. Send description, formula or material list, label and existing evidence. Provide confidential manufacturer data through the agreed transfer channel.