USDA

Министерство
Сельского
Хозяйства США

Посольство
США в Москве

Большой
Девятинский
переулок, 8

121099 Москва

Россия

6 апреля 2021 г.

Господину Тимуру Бекбулатовичу Нурашеву
Директору Департамента технического регулирования
и аккредитации
Евразийская экономическая комиссия
115114, г. Москва,
ул. Летниковская, д. 2, стр. 1, стр. 2.

Уважаемый господин Нурашев,

Посольство США в Российской Федерации выражает свое уважение Департаменту технического регулирования и аккредитации Евразийской экономической комиссии.

От имени коллег из Зарубежной сельскохозяйственной службы Министерства сельского хозяйства США (USDA, FAS) направляю Вашему вниманию комментарии правительства США на уведомление Российской Федерации и Кыргызской Республики в ВТО G/SPS/N/RUS/210 от 16.02.2021 г. и G/SPS/N/KGZ/19 от 26.002.2021 г., соответственно, в отношении проекта изменений в технический регламент Таможенного союза «О безопасности пищевой продукции» (ТР ТС 021/2011) в части установления максимально допустимых уровней остатков ветеринарных лекарственных средств (фармакологически активных веществ), которые могут содержаться как в не переработанной, так и в переработанной пищевой продукции животного происхождения. Мы направим неофициальный перевод вышеуказанных комментариев в ближайшее время по мере готовности.

Пожалуйста, примите уверения в моей глубокой признательности.

С уважением,

Джеймс Голсен
Советник посольства США по торговым вопросам

Приложения: комментарии на 4 стр.

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The United States appreciates the opportunity to comment on the Eurasian Economic Commission's (EEC) draft amendments to its Custom Union's technical regulation "On Food Safety" (TR TS 021/2011) regarding maximum residue limits (MRLs) for veterinary drugs contained in processed and unprocessed products of animal origin, which Russia notified to the World Trade Organization (WTO) on February 19, 2021 as G/SPS/N/RUS/210. The United States is concerned that the EEC's draft MRLs for Amprolium, Bacitracin, Decoquinate, Lasolocid, Tiamulin, Tulathyromycin, Florfenicol, Cefaprin, and Lincomycin (for swine) are more restrictive than those of the United States, and that the EEC's draft MRLs for Monensin and Lincomycin (for poultry) are more restrictive than those of the United States and Codex. The United States submits the following comments for Russia to take into consideration before the EEC's draft amendments enter into force.

The United States has included tables to highlight the most concerning amendments by comparing the EEC's proposed MRLs with the existing MRLs for the United States and, when applicable, Codex.

Codex does not have MRL guidelines for the EEC's proposed MRLs within Table 1. In the absence of Codex guidelines, the United States respectfully requests that Russia submit its scientific justification for setting MRLs at its proposed levels.

Table 1

Drug	Species/Tissue	U.S. MRL (ppm)	Codex MRL (ppm)	The EEC's proposed MRL (ppm)
Amprolium	Poultry/Meat, meat products/Skin/Crude Fat/Liver	2.0	N/A	0.2
	Kidney	0.5	N/A	0.4
Bacitracin	Rabbit/Meat, meat products/ Crude fat, liver, kidneys and foodstuffs containing them	0.5	N/A	0.15
Decoquinate	All food producing animal species	2.0	N/A	0.02
Lasolocid	Poultry/crude fat	1.2	N/A	0.1
	Poultry liver	0.4	N/A	0.1
Tiamulin	Swine/liver	0.6	N/A	0.5

Tulathyromycin	Bovine/ liver, kidneys Swine/Liver/Kidney	5.5 12	N/A N/A	3.0 3.0
Florfenicol	Bovine/Liver	3.7	N/A	3.0
	Swine/Liver	2.5	N/A	2.0
Cefaprin	Bovine/Muscle/Crude fat/	0.1	N/A	0.05
Lincomycin	Swine/liver	0.6	N/A	0.2

The EEC's proposed MRLs within Table 2 are lower than those of Codex and the United States and would therefore affect the United States' ability to export agricultural products to Russia and other EAEU member states. The United States would like to remind Russia that Article 2.2 of the WTO SPS Agreement requires Members to ensure measures are not maintained without sufficient scientific evidence. The United States respectfully requests that Russia submit its scientific justification for the proposed MRLs within Table 2 that are more restrictive than Codex guidelines.

Table 2

Drug	Species/Tissue	U.S. MRL (ppm)	Codex MRL (ppm)	The EEC's proposed MRL (ppm)
Lincomycin	Poultry, edible offal	0.05	0.05	0.02
Monensin	Bovine/muscle	0.05	0.01	0.002
Monensin	Bovine/fat	0.05	0.1	0.01
	Bovine/kidney	0.05	0.1	0.002

Could Russia please clarify the date or timeline of implementation the the EEC's proposed MRL changes?

Lastly, since EEC amendments would apply to all EAEU member states, will Kazakhstan and Armenia notify these draft amendments to the WTO and allow Members to submit comments for their consideration as well?

The United States appreciates the opportunity to comment on the Eurasian Economic Commission's (EEC) draft amendments to its Custom Union's technical regulation "On Food Safety" (TR TS 021/2011) regarding maximum residue limits (MRLs) for veterinary drugs contained in processed and unprocessed products of animal origin, which the Kyrgyz Republic notified to the World Trade Organization (WTO) on February 19, 2021 as G/SPS/N/KGZ/19. The United States is concerned that the EEC's draft MRLs for Amprolium, Bacitracin, Decoquinate, Lasolocid, Tiamulin, Tulathyromycin, Florfenicol, Cefaprin, and Lincomycin (for swine) are more restrictive than those of the United States, and that the EEC's draft MRLs for Monensin and Lincomycin (for poultry) are more restrictive than those of the United States and Codex. The United States submits the following comments for the Kyrgyz Republic to take into consideration before the EEC's draft amendments enter into force.

The United States has included tables to highlight the most concerning amendments by comparing the EEC's proposed MRLs with the existing MRLs for the United States and, when applicable, Codex.

Codex does not have MRL guidelines for the EEC's proposed MRLs within Table 1. In the absence of Codex guidelines, the United States respectfully requests that the Kyrgyz Republic submit its scientific justification for setting MRLs at its proposed levels.

Table 1

Drug	Species/Tissue	U.S. MRL (ppm)	Codex MRL (ppm)	The EEC's proposed MRL (ppm)
Amprolium	Poultry/Meat, meat products/Skin/Crude Fat/Liver	2.0	N/A	0.2
	Kidney	0.5	N/A	0.4
Bacitracin	Rabbit/Meat, meat products/ Crude fat, liver, kidneys and foodstuffs containing them	0.5	N/A	0.15
Decoquinate	All food producing animal species	2.0	N/A	0.02
Lasolocid	Poultry/crude fat	1.2	N/A	0.1
	Poultry liver	0.4	N/A	0.1
Tiamulin	Swine/liver	0.6	N/A	0.5

Tulathyromycin	Bovine/ liver, kidneys Swine/Liver/Kidney	5.5 12	N/A N/A	3.0 3.0
Florfenicol	Bovine/Liver	3.7	N/A	3.0
	Swine/Liver	2.5	N/A	2.0
Cefaprin	Bovine/Muscle/Crude fat/	0.1	N/A	0.05
Lincomycin	Swine/liver	0.6	N/A	0.2

The EEC's proposed MRLs within Table 2 are lower than those of Codex and the United States and would therefore affect the United States' ability to export agricultural products to the Kyrgyz Republic and other EAEU member states. The United States would like to remind the Kyrgyz Republic that Article 2.2 of the WTO SPS Agreement requires Members to ensure measures are not maintained without sufficient scientific evidence. The United States respectfully requests that the Kyrgyz Republic submit its scientific justification for the proposed MRLs within Table 2 that are more restrictive than Codex guidelines.

Table 2

Drug	Species/Tissue	U.S. MRL (ppm)	Codex MRL (ppm)	The EEC's proposed MRL (ppm)
Lincomycin	Poultry, edible offal	0.05	0.05	0.02
Monensin	Bovine/muscle	0.05	0.01	0.002
Monensin	Bovine/fat	0.05	0.1	0.01
	Bovine/kidney	0.05	0.1	0.002

Could the Kyrgyz Republic please clarify the date or timeline of implementation the the EEC's proposed MRL changes?

Lastly, since EEC amendments would apply to all EAEU member states, will Kazakhstan and Armenia notify these draft amendments to the WTO and allow Members to submit comments for their consideration as well?