



Comments from Agriculture and Livestock Service (SAG) of Chile

Notification G/TBT/N/RUS/41

We would like to thank Russia for providing the opportunity to comment on G/TBT/N/RUS/41 notified the December 9, 2014 according to Article 2.9 of the WTO TBT Agreement, regarding to Draft Technical Regulation of the Customs Union "Poultry Meat and Poultry Processed Products".

Our main comments and requests on this draft technical regulation are as follows:

1. Annexes tables

- a. Annexes 1 to 7: We request to specify the analytical techniques used (ISO, AOAC, screening, etc.) for the development of the tables included in these annexes.
- b. Annex 3: Limits set out in Annex 3, clarification is sought whether the unit of the permissible limits are right: microgram / kilo or milligrams / kilo.
- c. Annex 4: Limits for products intended for baby food established in Annex 4, we request to indicate the international standard under which this information is based.

2. Chapter II: Main concepts

"Stunning of poultry" - a focused impact on the body of poultry for slaughter to limit its ability to move, with living heart before slaughter.

Proposal: Incorporate in this definition: "the death of births in any form is allowed".

3. Chapter VII: Requirements for slaughtered birds products and for their production processes

Article 28. *Birds set for slaughter on the production facility shall be healthy and originate from poultry farms and administrative territories officially free from infectious diseases of birds and other animals.*

Birds coming to the production facility for slaughter, production of poultry slaughter products and products of their processing for human consumption, shall be subject to preslaughter veterinary inspection in accordance with the animal health requirements established by normative legal acts of the Customs Union and/or corresponding legislation of the members

Proposal: the origin premises have an official sanitary control of the competent authority, considering that an official veterinarian carries out an ante-mortem and post-mortem inspections to 100% of birds in the slaughterhouse

Article 29. *It is not allowed to:*

Letter f) disposal (destruction) of biological waste (poultry carcasses, slaughter waste, veterinary condemned birds) and other waste from the processing of food and non-food raw materials of animal origin shall be carried out according to the veterinary and sanitary requirements established by normative legal acts the Customs Union and/or corresponding legislation of the Member States;

Referenced standards for analysis is requested

Letter g) send birds to slaughter earlier than 10 days after the last day of feeding them fish, fish waste and meal.

Request: Please indicate the rules or standards or scientific data support this requirement.

Article 37. *Knives, scissors, forks and other tools; chain gloves, aprons and shoes shall be cleaned and disinfected according to their state, but no fewer than 1 time in 30 minutes.*

Request: technical standard covered by this article or otherwise to extend this recital indicating other alternatives that pursue the same objective.

Article 38. *Chilling process, regardless of its type, shall provide temperature no higher than 4°C at any measurement point in poultry carcasses.*

To reduce the risk of cross-contamination of poultry carcasses in immersion chilling, it is allowed to use antimicrobial processing aids in accordance with the requirements of Technical Regulation of the Customs Union, which establishes the requirements for food additives, flavorings and processing aids, and other antimicrobial agents that are not included in the regulations, but which have permits for application for such purposes.

Request: Please send the Technical Regulation of the Custom Union in order to analyze and make comments if relevant.

Solutions containing chlorine above the requirements set for drinking water are not allowed to be used in the technological operation of immersion chilling of poultry carcasses.

Request: please indicate the Custom Union standard for drinking water.

Article 39. *All types of chilling are allowed for use in the production of poultry meat for baby food except immersion.*

Request: please indicate the standard under which this proposal is based.

Article 40. *It is not allowed to introduce water and other ingredients into the manufacturing process of the slaughter products, poultry carcasses and their parts.*

Request: please clarify this point.

Article 44. *The temperature and humidity conditions in production facilities and technological process parameters ensuring product safety are set by the manufacturer based on the features of the raw materials and technology used and the safety parameters of manufactured products regulated in technical documents, approved in accordance with the laws of the Member States.*

Request: please we request the indicated standard for the respective analysis.

Article 47. *After slaughter, poultry carcasses and internal organs are subject to veterinary and sanitary examination in accordance with the animal health requirements established by the normative legal acts of the Customs Union and/or legislation of the Member States.*

Request: please we request the indicated standard for the respective analysis.

Article 51. *Products of poultry slaughter for baby food are produced at the beginning of a shift or in a separate shift provided that pre-washing and disinfection of production equipment and inventory and sanitizing facilities is carried out prior to this process.*

Request: please indicate the international standard under which this proposal is based.

SAG would be grateful if the above-mentioned comments could be taken into account and replied to before the adoption of the notified draft.

Comments from Association of Poultry Producers (APA) of Chile Notification G/TBT/N/RUS/41

We would like to thank Russia for providing the opportunity to comment on G/TBT/N/RUS/41 notified the December 9, 2014 according to Article 2.9 of the WTO TBT Agreement, regarding to Draft Technical Regulation of the Customs Union "Poultry Meat and Poultry Processed Products".

Our main comments on this draft technical regulation are as follows:

Letter f point 32: *"internal organs shall not be removed from poultry carcasses prior to veterinary and sanitary examination"*

Comments: It should allow the viscera can be removed and placed in a tray to improve post mortem veterinary inspection, as long as the correlation is not lost among the viscera and their respective carcasses.

Point 37: *"Knives, scissors, forks and other tools; chain gloves, aprons and shoes shall be cleaned and disinfected according to their state, but no fewer than 1 time in 30 minutes"*.

Comments: The clearance of these elements may be different to that required by this technical standard, provided that microbiological validations were obtained to ensure these elements are not a safety risk in poultry and its derivatives.

APA would be grateful if the above-mentioned comments could be taken into account and replied to before the adoption of the notified draft.