

ФЕДЕРАЛЬНАЯ СЛУЖБА ПО ВЕТЕРИНАРНОМУ И ФИТОСАНИТАРНОМУ НАДЗОРУ Российская Федерация 107139, Москва, Орликов пер., 1/11 Тел.: (7 499) 975-4347 Факс: (7 495) 607-5111 E-mail: info@svfk.mcx.ru http://www.fsvps.ru	FEDERAL SERVICE FOR VETERINARY AND PHYTOSANITARY SURVEILLANCE 1/11, Orlikov per., 107139, Moscow Russian Federation Phone: (7 499) 975-4347 Fax: (7 495) 607-5111 E-mail: info@svfk.mcx.ru http://www.fsvps.ru
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Москва, 21 ноября 2008 г.

№ ФС-АС-2/11822

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Представительство Комиссии
Европейских Сообществ в
Российской Федерации
Советнику по сельскому хозяйству

г-ну Альберто Вольпато

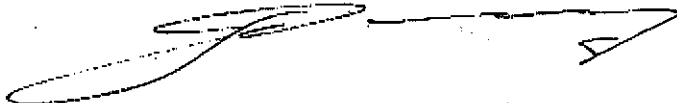
Уважаемый господин Вольпато,

Федеральная служба по ветеринарному и фитосанитарному надзору направляет письмо, адресованное заместителю Генерального директора Генерального директората ЕК по здравоохранению и защите потребителя г-же Паоле Тестори Коджи, и просит передать его по назначению.

Примите, господин Вольпато, уверения в моем глубоком к Вам уважении.

Приложение: на 4 листах.

И.о. Руководителя

 А.И. Саурин

<p>ФЕДЕРАЛЬНАЯ СЛУЖБА ПО ВЕТЕРИНАРНОМУ И ФИТОСАНИТАРНОМУ НАДЗОРУ Российская Федерация Орликов пер., 1/11, Москва, 107139 Тел.: (7 499) 975-4347 Факс: (7 495) 607-5111 E-mail: info@svfk.mcx.ru http://www.fsvps.ru</p>	<p>FEDERAL SERVICE FOR VETERINARY AND PHYTOSANITARY SURVEILLANCE 1/11, Orlikov per., Moscow, 107139 Russian Federation Phone: (7 499) 975-4347 Fax: (7 495) 607-5111 E-mail: info@svfk.mcx.ru http://www.fsvps.ru</p>
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Москва, 21 ноября 2008 г.
№ ФС-АС-2/11821

Заместителю Генерального директора
Генерального Директората ЕК по
здравоохранению и защите потребителя
г-же Паоле Тестори Коджи

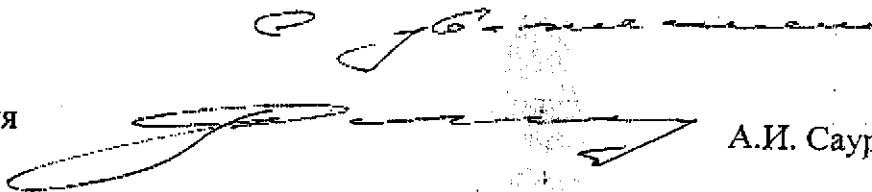
Уважаемая г-жа Тестори Коджи,

Федеральная служба по ветеринарному и фитосанитарному надзору свидетельствует свое уважение Генеральному Директорату ЕК по здравоохранению и защите потребителя и направляет ответ Компетентного органа Российской Федерации на рекомендации, содержащиеся в Отчете миссии DG (SANCO)/2008-7673-MR.

Примите, г-жа Тестори Коджи, уверения в моем глубоком к Вам уважении.

Приложение: на 3 листах.

И.о. Руководителя



А.И. Саурин

**Response of the Competent Authorities of the Russian Federation
to the recommendations of Mission report ref. DG(SANCO)/2008-7673-MR carried out
from June 16 to 27 June, 2008 in order to evaluate the control systems in place governing
production of fishery products intended for export to the European Union (follow up)**

N	Recommendations of the Mission	Action proposed by CCA of RF
1	The CCA should ensure that all standards specified in the "Uniform list of requirements for the producers-exporters of FP to EU Member States" are applied and respected in practice. In particular the important deficiencies in sampling and analyzing for histamine should be corrected in order to be in line with Regulation (EC) N 2073/2005. Furthermore the CCA should ensure that official sampling for water and ice is done regularly for all parameters to ensure equivalence with Community standards of portable water (Directive 98/83/EC).	The CCA shall ensure in practice the observance of all standards laid down in the "Uniform list of requirements for the producers-exporters of FP to EU Member States" The CCA shall ensure that in sampling and analyzing for histamine, the requirements of Regulation (EC) N 2073/2005 be implemented. The CCA shall ensure that official sampling for water and ice is done regularly at the establishments of the producers-exporters of FP for the laboratory assay of all parameters in accordance with Directive 98/83/EC.
2	The CCA should make appropriate resources available to ensure that official controls on water and ice can be carried out and that the work plans for surveillance and inspection activities can be respected so that the official controls are in line with Regulation (EC) N 854/2004.	In order to ensure that the official laboratory controls on water and ice can be carried out, the CA plans: - to allocate the appropriate funds to acquire the necessary laboratory equipment and reagents; - to arrange additional certification (attestation) of some laboratories under the Russian Federal Service for Veterinary & Phytosanitary Surveillance in compliance with GOST and ISO/IEC 17025-2006 to approve for controls on water.
3	The CCA should ensure that the official controls carried out by the regional veterinary services on some elements of the production chain of FP intended for export to the EU can guarantee equivalence with the relevant provisions of Regulation (EC) N 854/2004.	The CCA shall ensure that the regional veterinary services shall carry out the official control of fishing and transport vessels, the landing sites and cold stores used for freezer storage of the raw and finished products of the production chain and exported to the EU fish products.
4	The CCA should ensure that the communication and coordination between NFQ and the regional veterinary services is efficient and effective	The CCA shall ensure efficient and effective communication and coordination between NFQ and the regional veterinary services
5	The CCA should make sure that the freezer and factory vessels are all equipped with a temperature recording device as foreseen in Regulation (EC) N 853/2004, Annex III, Section VIII, Chapter I, Part	The CCA shall ensure verification for the availability of temperature recording devices at the freezer and factory vessels as foreseen in Regulation (EC) N 853/2004, Annex III, Section VIII, Chapter I, Part I, Point C2.

	I, Point C2.	
6	The CA should ensure that the corrective actions for CCP's are well described in the HACCP plans implemented in EU approved facilities in accordance with the principles laid down in Article 5 of Regulation (EC) N 854/2004. The CCA should ensure that the CCP's do not exceed EU thresholds and the corrective actions for CCPs are described in the HACCP plans.	NFQ shall ensure check-ups of the establishments-exporters for comprehensive description of the corrective actions when exceeding EU safety thresholds in CCPs as stated in the HACCP plans, as well as verification of implementing these actions.
7	The CCA should ensure that only those establishments and vessels meeting standards at least equivalent to Community requirements are kept on the list of establishments and vessels approved for export to the EU in accordance with Articles 12, Point 2 and 3 and Art. 15 of Regulation (EC) N 854/2004 and with Article 48 of Regulation (EC) N 882/2004.	The CCA shall ensure introduction of amendments to the list of establishments and vessels approved for export to the EU in accordance with the standards at least equivalent to the Community requirements.
8	A full monitoring program for live bivalve mollusks should be put in place to ensure equivalence with Regulation (EC) N 854/2004, Annex II, Chapter III for scallops for export to the EU.	At present, single consignments of the frozen filleted scallops are exported to the EU that is produced from the raw material derived outside the classified production areas. The CCA shall ensure testing of scallop consignments on the site for the safety parameters in accordance with the EU rules.
9	The CCA should ensure that deficiencies in approved establishments and vessels are properly addressed and that an effective follow-up is ensured. The CCA should demonstrate through effective enforcement of existing standards that they can ensure that only FP originating from establishments and vessels with standards at least equivalent to those required by Community legislation as foreseen in Regulation (EC) N 854/2004, Article 12.2 are approved for export to the EU.	The CCA shall ensure that the appropriate sanctions shall be applied towards the establishments and vessels which failed to implement the CA instructions in the due time, including the demand to exclude them from the list of the Russian establishments/vessels-exporters of FP to the EU Member States.
10	The CCA should ensure that proficiency tests are carried out in line with Regulation (EC) N 882/2004, Article 12.	The CCA shall ensure that the laboratories designated to carry out official lab. control should have the appropriate certification (attestation) in accordance with ISO/IEC 17025-2006 Standard.
11	The CCA should ensure that the official method for testing histamine is in line with Regulation (EC) N 2073/2005, Annex I, Chapter I, Point 1,25.A	The CCA shall ensure that the official method for testing histamine is in line with Regulation (EC) N 2073/2005, Annex I, Chapter I, Point 1,25.A

12	<p>The CCA should revise the current certification procedure to ensure that certifying officers only sign export health certificates for fish and FP which are personally controlled by them, to be in line with the requirements of Council Directive 96/93/EC. It should consider involving the CA of the foreign countries where the final products are transshipped /stored before export to EU.</p>	<p>The CCA shall consider the possibility of involving the CA of the foreign countries to inspect the consignments of FP when issuing the health certificates.</p>
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