

Date of last updating: 01.06.2021

| Comparison table Fishery products, intended for human consumption | | | | | |
|--|--|---|---|---|---|
| Number of Section of International Certificate | Subject matter of legal act | Name of UA legal act | UA legal act is available at the following link: | EU acts | Additional requirements/ Comments |
| II.1.2 | Hygienic requirements for production and storage of food products | Chapter VII of the Law of Ukraine «On basic principles and requirements for safety and quality of food products» (№ 771) | https://zakon.rada.gov.ua/laws/show/771/97-%D0%B2%D1%80 | <u>Annexes I-II of Regulation (EC) No 852/2004</u> | The requirements of EU and UA legislation are the same. However, regarding the provisions on hygiene of personnel, UA requires training of the staff by the business operator on personnel hygiene and on hygiene requirements for the production and circulation of food products, which should take place before admittance to the establishments and regularly thereafter and has to be accordingly confirmed by relevant records of the business operator. For complete analysis, refer to Annex 1. |
| | Maximum levels of certain contaminants in food products | Order of the Ministry of Health of Ukraine «On approval of the State hygiene rules and norms "Regulation of maximum levels of certain contaminants in food"» (№ | https://zakon.rada.gov.ua/laws/show/z0774-13 | <u>Commission Regulation (EC) No 1881/2006</u> | The requirements of EU and UA legislation are the same. For complete analysis, refer to Annex 3. |

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| | Maximum limits (levels) of residues of active substances of veterinary preparations | 368 of 13.05.2013) Order of the Ministry of Health of Ukraine «On approval of Food Safety Indicators "Maximum limits (levels) of residues of active substances of veterinary preparations in foodstuffs of animal origin"» (№ 2646 of 23.12.2019) | https://zakon.rada.gov.ua/laws/show/z0042-20 | Commission Regulation (EU) No 37/2010 Regulation (EC) No 470/2009 | Requirements of UA legislation are in line with corresponding requirements of EU legislation. For complete analysis, refer to Annex 4 . |
| II.1.3 | Microbiological criteria for food products | Order of the Ministry of Health of Ukraine «On Approval of Microbiological Criteria for Establishing Food Safety Indicators» (№ 548 of 19.07.2012) | https://zakon.rada.gov.ua/laws/show/z1321-12 | Commission Regulation (EC) No 2073/2005 | The requirements of EU and UA legislation are the same except for microbiological criteria for fish sauce produced by fermentation of fishery products . In UA legislation fish sauce produced by fermentation of fishery products goes under category “Fishery products, which have undergone enzyme maturation treatment in brine, manufactured from fish species associated with a high amount of histidine” for which UA establishes the following |

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| | | | | | <p>criteria: n=9, c=2, m = 200 mg/kg, M = 400mg/kg.</p> <p>In contrast, EU establishes the following criteria for fish sauce produced by fermentation of fishery products: n=1, c=0, m = M = 400mg/kg.</p> <p>N.B. According to EU and UA legislation:</p> <ul style="list-style-type: none"> • n = number of units comprising the sample; • c = number of sample units giving values between m and M. <p>For complete analysis, refer to Annex 2.</p> |
| II.1.4 | Hygienic requirements for packing of food products | Chapter VII of the Law of Ukraine «On basic principles and requirements for safety and quality of food products» (№ 771) | https://zakon.rada.gov.ua/laws/show/771/97-%D0%B2%D1%80 | CHAPTER X of Annex II of Regulation (EC) No 852/2004 | There are no differences between EU and UA requirements. |
| II.1.7 | Monitoring Plan for residues of veterinary preparations | Article 19 of the Law of Ukraine «On state control performed to ensure | https://zakon.rada.gov.ua/laws/show/2042-19/print | Council Directive 96/23/EC | There are no differences between EU and UA requirements. |

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| | | verification of compliance with the law on food, feed, animal by-products, animal health and welfare»(№ 2042 of 18.05.2017) | | Regulation (EU) 2017/625 | |
| II.1.8 | State control of the production of fishery products | Article 39 of the Law of Ukraine «On state control performed to ensure verification of compliance with the law on food, feed, animal by-products, animal health and welfare» (№ 2042 of 18.05.2017) | https://zakon.rada.gov.ua/laws/show/2042-19/print | Articles 67-68, 70-71, Annex VI of Commission Implementing Regulation (EU) 2019/627 | Requirements of UA legislation are in line with corresponding requirements of EU legislation. |
| II.1.9 | Histamine levels | Order of the Ministry of Health of Ukraine «On Approval of Microbiological Criteria for Establishing Food Safety Indicators» (№ 548 of 19.07.2012) | https://zakon.rada.gov.ua/laws/show/z1321-12 | Commission Regulation (EC) No 2073/2005 | The requirements of EU and UA legislation are the same except for microbiological criteria for fish sauce produced by fermentation of fishery products. In UA legislation fish sauce produced by fermentation of fishery products goes under category “Fishery products, which have |

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| | | | | | <p>undergone enzyme maturation treatment in brine, manufactured from fish species associated with a high amount of histidine” for which UA establishes the following criteria: n=9, c=2, m = 200 mg/kg, M = 400 mg/kg.</p> <p>In contrast, EU establishes the following criteria for fish sauce produced by fermentation of fishery products: n=1, c=0, m = M = 400 mg/kg.</p> <p>N.B. According to EU and UA legislation:</p> <ul style="list-style-type: none"> • n = number of units comprising the sample; • c = number of sample units giving values between m and M. <p>For complete analysis, refer to Annex 2.</p> |
| | <p>Total volatile basic nitrogen (TVB-N) and Trimethylamine N-oxide (TMA-N) levels (in unprocessed fishery products)</p> | <p>Points 7.1.4- 7.1.5 of the Order of Ministry of Health of Ukraine «On approval of State Sanitary rules and norms for establishments and vessels, that produces</p> | <p>https://zakon.rada.gov.ua/laws/show/z0435-03#Text</p> | <p><u>Annex VI of Commission Implementing Regulation (EU) 2019/627</u></p> | <p>1. Regarding total volatile basic nitrogen (TVB-N), UA levels in fishery products correspond to the limits established by EU legislation, except for:</p> <p>EU imposes TVB-N limits (30 mg of</p> |

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| | | products from fish and other live aquatic sources» (№ 197 of 06.05.2003) | | | <p>nitrogen/100 g) for species belonging to the Pleuronectidae family (with the exception of halibut: <i>Hippoglossus spp.</i>), when Ukraine imposes same limits (30 mg of nitrogen/100 g) for all species belonging to the Pleuronectidae family (<u>without any exceptions</u>).</p> <p>2. Regarding Trimethylamine N-oxide (TMA-N): maximum limits have not been established yet by UA legislation.</p> <p>For complete analysis, refer to Annex 5.</p> |