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Committee on Sanitary and Phytosanitary Measures

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**CHINA'S ADMINISTRATIVE MEASURES FOR REGISTRATION OF OVERSEAS
MANUFACTURERS OF IMPORTED FOOD (26 NOVEMBER 2019)**

SUBMISSION BY THE UNITED STATES

The following document, received on 26 June 2020, is being circulated at the request of the delegation of the United States.

1.1. The United States would like to raise concerns regarding China's draft *Administrative Measures for Registration of Overseas Producers of Imported Foods* (Administrative Measures).

1.2. These Administrative Measures appear to require registration of foreign food facilities and evaluation of those facilities by the foreign competent authority against foreign regulations as a condition of importation into China.

1.3. We note that all food products appear to fall within the scope of the requirements laid out in these Administrative Measures, including both low risk products and products that currently are accompanied by health and safety certificates issued by US authorities.

1.4. Furthermore, the Administrative Measures appear to require foreign competent authorities to confirm that manufacturers are in continuous compliance with China's laws, regulations, and standards.

1.5. We anticipate that the draft measure, if implemented, would create significant trade disruptions for every Member that exports food and agricultural products to China.

1.6. China issued these Administrative Measures for domestic consultation in November 2019, and it is our understanding that China plans to notify the revised draft measures to the WTO. We look forward to reviewing them and providing comments.
