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Committee on Sanitary and Phytosanitary Measures

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STC 446: EU REVIEW OF LEGISLATION ON VETERINARY MEDICINAL PRODUCTS

SUBMISSION BY THE UNITED STATES

The following document, received on 8 July 2020, is being circulated at the request of the delegation of the United States.

1.1. The United States would like to recall our previous statements at the July 2018, November 2018 and March 2019 Committee meetings that lay out our concerns regarding the implementation by the European Union of Article 118 of EU 2019/6.

1.2. We will not reiterate the details of these concerns now. These are documented in the Committee's summary records of previous meetings.

1.3. We appreciate our extensive bilateral engagement with the European Union, as well as the European Union's willingness to meet with concerned third countries in March 2019 and January 2020.

1.4. We note that the implementation of this measure will require producers of animals and products of animal origin who intend to ship to the European Union to comply with new EU production standards.

1.5. We understand that the European Commission developed a draft on the delegated act of the criteria to designate antimicrobials to be reserved for human treatment. Does the European Commission plan to consult with stakeholders and third countries on this draft?

1.6. We would like to note our previous questions regarding the scope of animal products that the EU measure will impact, the antimicrobials to be included on the EU list, and the enforcement mechanisms to be employed by the European Union.

1.7. Lastly, we understand that the delegated act on the criteria for antimicrobials is to be adopted no later than 27 September 2021, and the implementing acts on the list and rules for imports, no later than 27 January 2022.

1.8. We are concerned that the transition period between issuing the list of antimicrobials reserved for human use only and its application to imports will not allow sufficient time for producers and other operators to adapt.

1.9. The United States has successfully implemented national programs to combat antimicrobial resistance while avoiding trade restrictions. We urge the European Union to do so as well.
