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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) –  
SPECIFIC TRADE CONCERN 485**

SUBMISSION BY THE UNITED STATES OF AMERICA

The following document, received on 13 November 2020, is being circulated at the request of the Delegation of the United States of America.

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1.1. The United States remains concerned with China's draft "Administrative Measures for Registration of Overseas Producers of Imported Foods" (Administrative Measures) and urges China to reconsider implementing this restrictive, unnecessary and burdensome regulation.

1.2. The draft measures appear as though they may apply to all food products, including both low-risk products and products that are already accompanied by health and safety certificates issued by foreign government competent authorities.

1.3. The draft measures also appear as though they would require foreign competent authorities to confirm that manufacturers are in continuous compliance with China's laws, regulations, and standards. We request that China provide its technical justification for these requirements and explain how they are related to China's level of protection.

1.4. We anticipate that the draft measures, if implemented, would likely create major trade disruptions for many countries that export food and agricultural products to China, including developing countries whose competent authorities may have limited capacity to meet China's proposed requirements.

1.5. In previous SPS and TBT Committee meetings, China indicated that it was still drafting these measures, and we request that China provide its timeline for completing and notifying the draft measures to the WTO.

1.6. We also reiterate our request that China reconsider the necessity of these measures and that it work with WTO Members in a transparent, inclusive, science-based manner when developing measures that affect international trade.

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