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**Committee on Sanitary and Phytosanitary Measures**

Original: English

**EUROPEAN UNION'S MODEL CERTIFICATES FOR COMPOSITE PRODUCTS –  
SPECIFIC TRADE CONCERN 504**

SUBMISSION BY THE UNITED STATES

The following submission, received on 30 March 2021, is being circulated at the request of the Delegation of the United States.

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1.1. The United States thanks Australia, China, the Russian Federation, and the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu for raising this issue and wishes to highlight our concerns that the proposed model certificates notified under [G/SPS/N/EU/401](#), [G/SPS/N/EU/402](#), and [G/SPS/N/EU/403](#) will negatively affect supply chains.

1.2. A broad spectrum of products remains subject to certification and verification requirements. For example, shelf stable composite products containing meat products must be accompanied by the certificate regardless of the amount of the meat content, or whether that ingredient is highly refined.

1.3. Non-shelf stable products require the certification of all animal derived ingredients regardless of the total percentage in the composite product, resulting in the need for certification from multiple regulatory authorities for a single composite product. The EU model certificate, however, allows for signature by a single regulatory authority.

1.4. The United States requests that the EU delay its 21 April 2021 entry into force for composite product requirements until it has addressed how to accommodate overlapping regulatory jurisdiction in third country markets.

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