



11 November 2021

(21-8557)

Page: 1/1

Committee on Sanitary and Phytosanitary Measures

Original: English

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

SUBMISSION BY THE UNITED STATES OF AMERICA

The following submission, received on 8 November 2021, is the statement made by the United States of America at the 3-5 November 2021 WTO SPS Committee, and is being circulated at the request of the Delegation of the United States of America.

-
1. The United States thanks Australia, Chinese Taipei, and the Russian Federation for raising this issue and wishes to again 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 and trade.
 2. As we have stated in previous meetings of the SPS Committee, the EU measures pertain to a broad spectrum of animal products. While the European Union has engaged with the United States in continuing discussions and negotiations around the new animal health certificate requirements, a great deal of work remains to be done in order to ensure that these measures do not overly or unnecessarily restrict trade.
 3. While we were pleased that the European Union chose to extend its deadline for all trading partners to 15 January 2022, the extension has not provided sufficient time for trading partners to adapt to the details outlined within the EU's regulations. Trading partners need additional time to address key questions related to implementation.
 4. For example, a significant amount of work remains to be done to address how, for any individual product, exporting countries are expected to address overlapping regulatory jurisdictions in third country markets. This is relevant for both composite products that transit the European Union to a third market and composite products that contain ingredients sourced from third countries.
 5. Additionally, given the inherent structural differences between the EU regulatory approach and other countries' regulatory systems, trading partners need additional time to ensure that certificates appropriately account for regulatory oversight that achieves a level of protection at least equivalent to the EU level of protection.
-