

Committee on Sanitary and Phytosanitary Measures

**OVERVIEW REGARDING THE LEVEL OF IMPLEMENTATION OF THE
TRANSPARENCY PROVISIONS OF THE SPS AGREEMENT**

Note by the Secretariat¹

Revision

I. INTRODUCTION

1. In October 2007, the Secretariat circulated a background document (G/SPS/GEN/804) providing an overview regarding the level of implementation of the transparency provisions of the SPS Agreement. This document was intended to assist Members in their deliberations during the special workshop on transparency held in October 2007 and also during the Committee's discussions under the agenda item on transparency. As one of the recommendations of the workshop on transparency was for the Secretariat to circulate such an overview on a regular basis, the Secretariat has prepared this third and updated document.²

2. The document provides an overview regarding the level of implementation of the transparency obligations found in the SPS Agreement (Article 7 and Annex B) and of the Committee's Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement (G/SPS/7/Rev.3). It provides information in areas which the Secretariat is in a position to track (such as designation of Enquiry Points/Notification Authorities, circulation of notifications) but does not include those where the Secretariat is not directly involved (such as provision of comments on specific notifications).

3. In preparing this overview, the Secretariat has largely relied on the SPS Information Management System (SPS IMS), the public version of which was launched and presented in October 2007 during the transparency workshop.³ While some historical data on notifications dating back to 1995 has been retrieved from various internal resources and incorporated into the SPS IMS, some of the more detailed analysis has only been possible for the period as of June 2007, when the internal version of the SPS IMS became operational. Unless otherwise indicated, the analysis covers the period up until 31 August 2009. Most of the analysis contained in this document can be undertaken and updated directly by Members or other interested parties as the underlying data is publicly available and searchable through the SPS IMS.

4. At its meeting of April 2008, the SPS Committee adopted the revised Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement (G/SPS/7/Rev.3,

¹ This document has been prepared under the Secretariat's own responsibility and is without prejudice to the positions of Members or to their rights or obligations under the WTO.

² See G/SPS/R/47, para.44 for the recommendations arising from the workshop on transparency.

³ <http://spsims.wto.org>

hereafter the "2008 Transparency Procedures"), which took effect on 1 December 2008.⁴ Compared to the earlier version of the transparency procedures, which had been adopted by the Committee in 2002, the 2008 Transparency Procedures include *inter alia* revised notification formats which aim to facilitate the provision of clearer and more specific information regarding new or modified SPS measures by Members, e.g. regarding conformity with international standards and the period between the publication and entry into force of new regulations. As a result, this year's overview document includes some new figures covering the period since 1 December 2008. However, it will only be possible to track some trends over time once the revised formats have been operational for several years.

5. It should also be noted that there is still room for improvement regarding the actual amount and quality of information provided by Members in the various notification formats. This issue could be taken up as one of the themes during the next transparency workshop of the SPS Committee, scheduled for October 2010.

II. DESIGNATION OF NOTIFICATION AUTHORITIES AND ENQUIRY POINTS

6. Annex B, paragraph 9, of the SPS Agreement obliges Members to designate a single central government authority as responsible for the implementation of notification procedures. This agency is also referred to as the "SPS Notification Authority". As of October 2009, 135 WTO Members out of 153, i.e. two more than last year, had designated an "SPS Notification Authority". Those which have not include ten least developed countries (LDCs) and eight developing countries.⁵

7. Annex B, paragraph 3, of the SPS Agreement requires that each Member establish an Enquiry Point responsible for the provision of answers to all reasonable questions and of relevant documents. As of October 2009, 144 WTO Members out of 153, i.e. two more than last year, had provided the WTO with the contact information of their Enquiry Point. Those which have not include eight LDCs and one developing country.⁶

III. SUBMISSION OF NOTIFICATIONS

8. Under the SPS Agreement, notifications are used to inform other Members about new or changed regulations that may significantly affect trade. Annex B, paragraphs 5 to 8, as well as the 2008 Transparency Procedures, elaborate on the notification procedures Members are to follow. For ease of reference, the specific sub-topics highlighted below follow the order of items that are contained in the regular and emergency notification formats.

Types of notifications

9. The two main types of notifications are regular notifications and emergency notifications. In addition, addenda, corrigenda, revisions or supplements can be issued subsequent to an original

⁴ See also footnote 4 of G/SPS/7/Rev.3 requesting the Secretariat to provide an annual report on the level of implementation of the transparency provisions of the SPS Agreement and of the recommended transparency procedures.

⁵ The categories of level of development rely on WTO working definitions as identified in the WTO's Integrated Database (IDB) for analytical purposes. They can be consulted through the SPS IMS by clicking on "definitions of groups" on the left-hand side menu bar. See G/SPS/NNA/15 for the latest list of Notification Authorities circulated as an official document by the WTO Secretariat in October 2009. The most up-to-date information on Members' notification authorities can be accessed through the SPS IMS.

⁶ See G/SPS/ENQ/25 for the latest list of Enquiry Points circulated as an official document by the WTO Secretariat in October 2009. The most up-to-date information on Members' Enquiry Points can be accessed through the SPS IMS.

regular or emergency notification.⁷ An addendum is used to provide additional information or changes to an original notification, for example if the products covered by the proposed regulation has been modified or if the comment period has been extended. A corrigendum is used to correct an error in an original notification such as an incorrect address detail. A revision is used to replace an existing notification, for example if a notified draft regulation was substantially redrafted or if a notification contained a large number of errors.

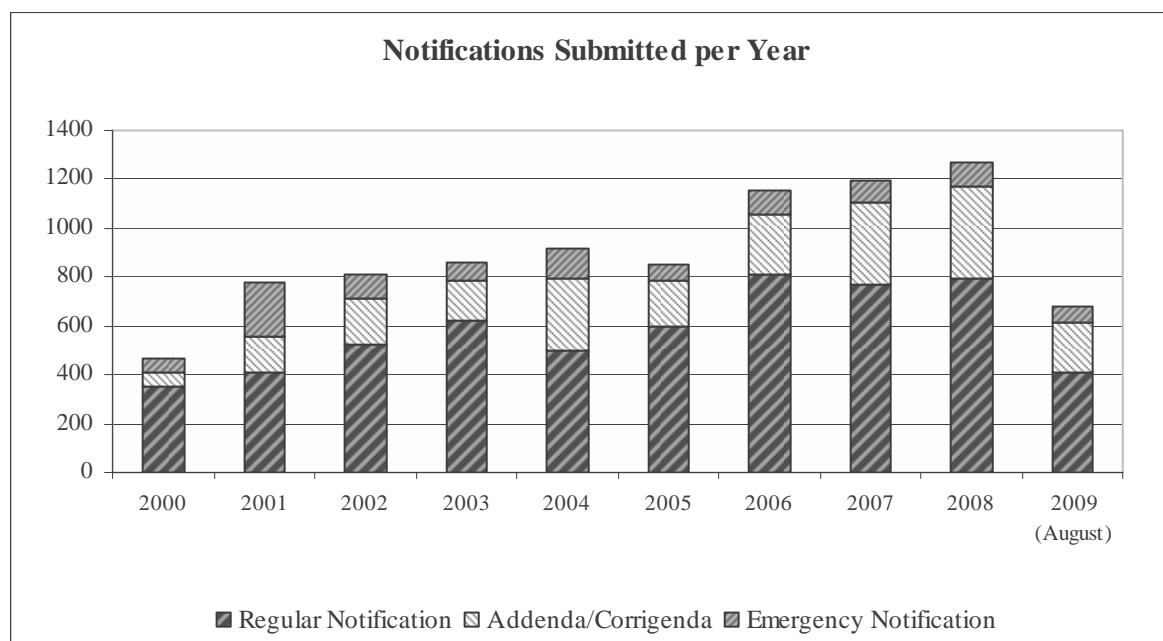
10. As of 31 August 2009, Members had submitted 7,060 regular notifications, 1,150 emergency notifications, and 2,306 addenda and corrigenda to regular and emergency notifications.

11. In April 2004, the Secretariat established a mechanism for Members to inform each other of the availability of unofficial translations of notified SPS measures into one of the official languages of the WTO. These are submitted in the form of supplements to the original notification. As of 31 August 2009, 14 supplement notifications had been circulated, two of which were submitted during the past year. It is interesting to note that the identical mechanism for sharing translations of notified TBT regulations, which was launched in January 2008, has already resulted in 179 supplement notifications. Members may wish to discuss why there have not been more supplement notifications in the SPS area.

12. In addition, the SPS Committee adopted a special format and recommended procedures for the notification of determination of the recognition of equivalence of sanitary or phytosanitary measures. As of 31 August 2009, two equivalence notifications were circulated, one from Panama in 2007 and another from the Dominican Republic in 2008.

13. Considering all types of notifications together, a total of 10,532 notifications were submitted to the WTO between 1 January 1995 and 31 August 2009. As can be seen in Figure 1, there has been an upward trend in the number of notifications over the years, with the total number of notifications reaching 1,273 for the year 2008.

Figure 1



⁷ See the Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement (G/SPS/7/Rev.3) for further elaboration on the different types of notifications.

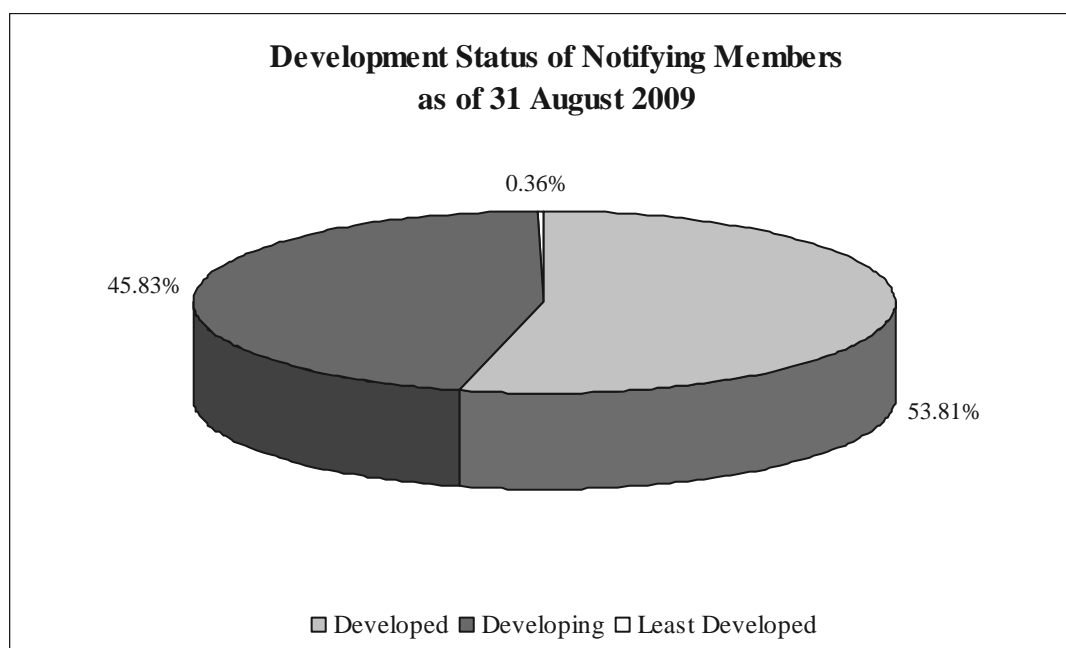
14. While the increase in notifications could be regarded as a sign of enhanced transparency, it should be kept in mind that these statistics on notifications do not necessarily provide an indication of the extent to which new or changed SPS measures are indeed being notified to the WTO.

Notifying Members

15. As of October 2009, 101 Members out of 153 (66 per cent) have submitted at least one notification to the WTO. This figure was 98 in October 2008, meaning that three additional Members (Former Yugoslav Republic of Macedonia, Swaziland, and Ukraine) have submitted at least one notification during the past year. Members which have not submitted any notification so far include 20 developing countries and 23 LDCs as well as a number of EC member states.⁸

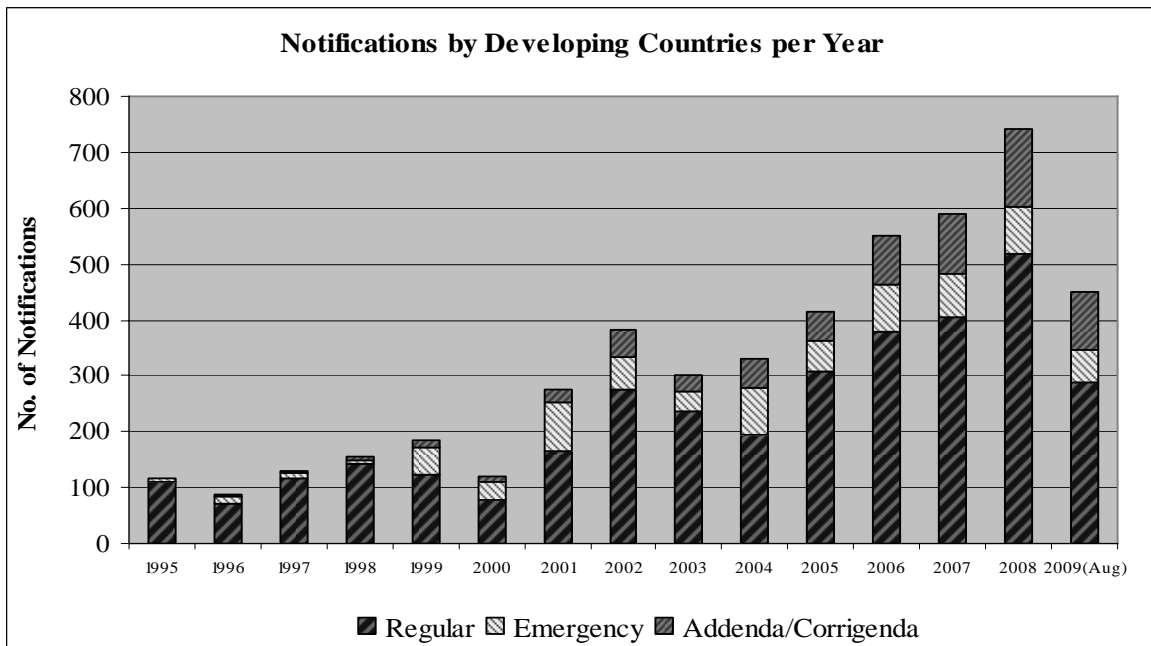
16. As can be seen in Figure 2, the share of notifications submitted by developed country Members reaches 54 per cent while the share of those by developing country Members is 45 per cent. A very small share comes from LDCs. Compared to last year, the share of notifications from developing countries has increased by two per cent while the share from LDCs has remained constant. As can be seen in Figure 3, there has been a steady increase in notifications from developing country Members over the years.

Figure 2



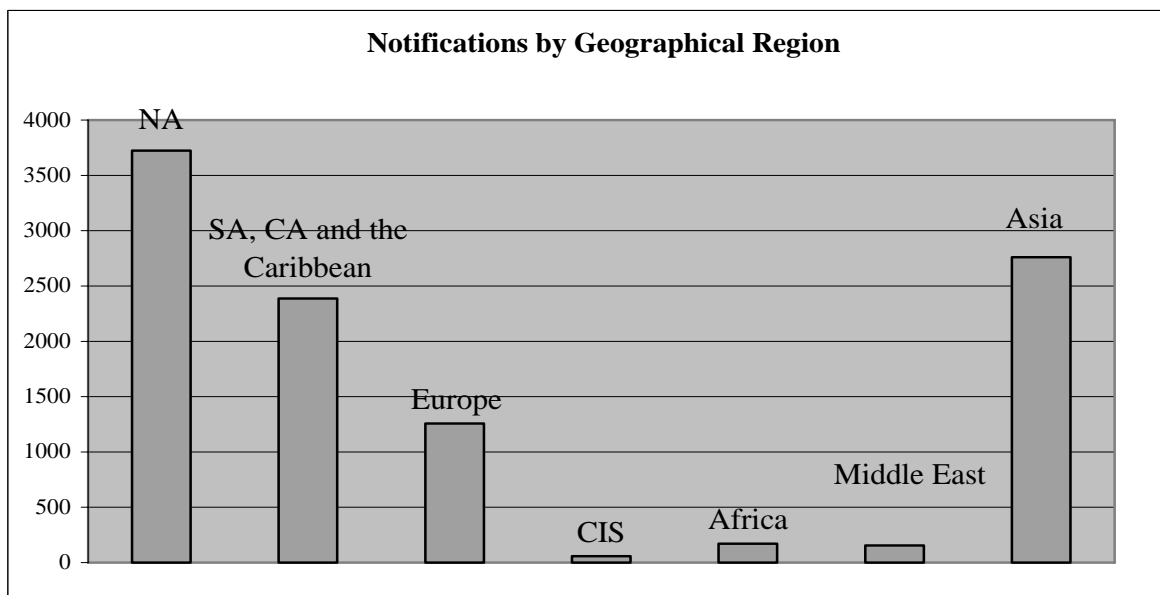
⁸ See G/SPS/GEN/456 for notification procedures for the European Communities and its member States.

Figure 3



17. Looking at the geographic regions from which the notifications originate, Figure 4 shows that the majority of notifications come from the North America region, followed by Asia, and then South and Central America and the Caribbean.⁹

Figure 4



⁹ The geographical groupings used rely on WTO working definitions as identified in the Integrated Database (IDB) for analytical purposes. The same groupings are used in the WTO's Annual Reports. They can be consulted through the SPS IMS by clicking on "definitions of groups" on the left-hand side menu bar.

18. The Members which have submitted the greatest number of notifications (regular and emergency) as of 31 August 2009, are listed in Table 1:

Table 1. Members which have submitted the most notifications

No.	Member	No. of Notifications	Share of Total
1	United States	1,949	23.74%
2	Brazil	579	7.05%
3	New Zealand	437	5.32%
4	Canada	434	5.29%
5	European Communities	363	4.42%
6	Republic of Korea	347	4.23%
7	Chile	311	3.79%
8	China	262	3.19%
9	Peru	241	2.94%
10	Australia	238	2.90%
11	Japan	234	2.85%
12	Mexico	221	2.69%
13	Thailand	187	2.28%
14	Taipei, Chinese	180	2.19%
15	Colombia	179	2.18%
16	Philippines	166	2.02%
17	Argentina	133	1.62%
18	Albania	122	1.49%
19	El Salvador	89	1.08%
20	Costa Rica	84	1.02%

Products covered

19. In accordance with paragraphs 5 and 6 of Annex B of the SPS Agreement and the 2008 Transparency Procedures, Members are required to identify the products to be covered by a new or changed SPS measure and should provide the relevant HS codes. While most notifications indicate the products to be covered, about a half provide specific HS codes. It is interesting to note, however, that most Members have indicated they would welcome the provision of these codes by their trading partners.¹⁰

20. Nonetheless, since 1995 the WTO's Central Registry of Notifications (CRN) has been assigning, to the extent possible, the relevant HS codes for all notifications.¹¹ While being only indicative, an assessment at the two-digit level reflected in Table 2 shows that the products covered by regular and emergency notifications most often fall under the following categories:

¹⁰ See the Analysis of Replies to the Questionnaire on the Operation of Enquiry Points and National Notification Authorities, (G/SPS/GEN/751/Rev.1, paras. 11 and 18) for further elaboration on this point.

¹¹ This information is now available in the SPS IMS.

Table 2. HS Codes assigned to notifications

Regular notifications		
HS Code	Description	Share of total
(38)	miscellaneous chemical products (in particular pesticides)	29%
(06)	live trees and other plants; bulbs, roots and the like; cut flowers and ornamental foliage	5%
(02)	meat and edible meat offal	5%
(07)	edible vegetables and certain tubers and tubers	4%
Emergency notifications		
HS Code	Description	Share of total
(02)	meat and edible meat offal	21%
(04)	dairy produce; birds' eggs; natural honey; edible products of animal origin, not elsewhere specified or included	21%
(01)	live animals	19%
(05)	Products of animal origin, not elsewhere specified or included	13%

Regions/countries affected

21. The 2008 Transparency Procedures also call on Members to identify the regions or countries which are most likely to be affected by the measure being notified. An assessment of the regular and emergency notifications submitted from June 2007 through August 2009 indicate that only 27 per cent have identified a specific group of countries or a region, while others contain general references such as "all trading partners", "all countries", etc. Some three per cent of all regular and emergency notifications have left this box blank.

22. The 2008 Transparency Procedures include a modified data entry option for this item whereby Members are invited to either select the tick box for "all trading partners" or provide information on specific regions or countries likely to be affected. From December 2008 through August 2009, 82 per cent of regular notifications have selected the tick box for "all trading partners", while the share is only 16 per cent for emergency notifications. This can be expected as emergency notifications are frequently taken in response to disease outbreaks in specific countries or regions.

23. On the one hand, the work of other Members would be facilitated if more specificity was provided by notifying Members on regions or countries likely to be affected. On the other hand, when submitting notifications, Members may be hesitant to specifically identify potentially affected countries or regions for fear of not accurately assessing who might be affected.

Objective and rationale

24. In accordance with paragraphs 5 and 6 of Annex B of the SPS Agreement and the 2008 Transparency Procedures, Members are also required to state the objective and rationale of proposed regulations by selecting one of the following five options: food safety, animal health, plant protection, protect humans from animal/plant pest or disease, and protect territory from other damage from pests.

25. Table 3 indicates the total number and share of each objective as cited in regular and emergency notifications. It must be noted, however, that many notifications identify more than one objective. Therefore, the table below specifies the total number of times the specific objective was assigned regardless of whether the notifications had multiple entries or not.

26. For regular notifications, the most frequently cited objective is food safety while for emergency notifications, it is animal health.

Table 3. "Objectives" of notified SPS measures (June 2007-August 2009)

Regular notifications		
	Total number	Share over 27 month period
Food Safety	1068	35.6%
Animal Health	369	12.3%
Plant Protection	649	21.6%
Protect humans from animal / plant pest or disease	698	23.3%
Protect territory from other damage from pests	218	7.3%
Emergency notifications		
	Total number	Share over 27 month period
Food Safety	119	23.4%
Animal Health	177	34.8%
Plant Protection	47	9.2%
Protect humans from animal / plant pest or disease	133	26.1%
Protect territory from other damage from pests	33	6.5%

International standards, guidelines or recommendations

27. The SPS Agreement does not require Members to notify a measure if its content is substantially the same as that of an international standard adopted by Codex, IPPC, or the OIE. Nonetheless, the 2008 Transparency Procedures encourage Members to notify all regulations that are based on, conform to, or are substantially the same as an international standard, guideline or recommendation, if they are expected to have a significant impact on trade of other Members. The revised formats also seek to get more precision from Members regarding relevant standards and the conformity of the notified measure with these.

28. With respect to regular notifications circulated from June 2007 through August 2009, Figure 5 indicates that in 57 per cent of the cases, Members have not identified an international standard as being relevant to the new measure being notified. Of the remaining 43 per cent, 17 per cent have referred to Codex, 13 per cent to the OIE, and 13 per cent to the IPPC. Still, there have been

exceptions. For example, more than 90 notifications relating to IPPC's ISPM 15 have been circulated.¹²

29. At the same time, Figure 6 shows that for the same 27-month period, only 19 per cent of emergency notifications have not identified an international standard as being relevant to the measure being notified, while 64 per cent have referred to the OIE as having a relevant international standard.

Figure 5

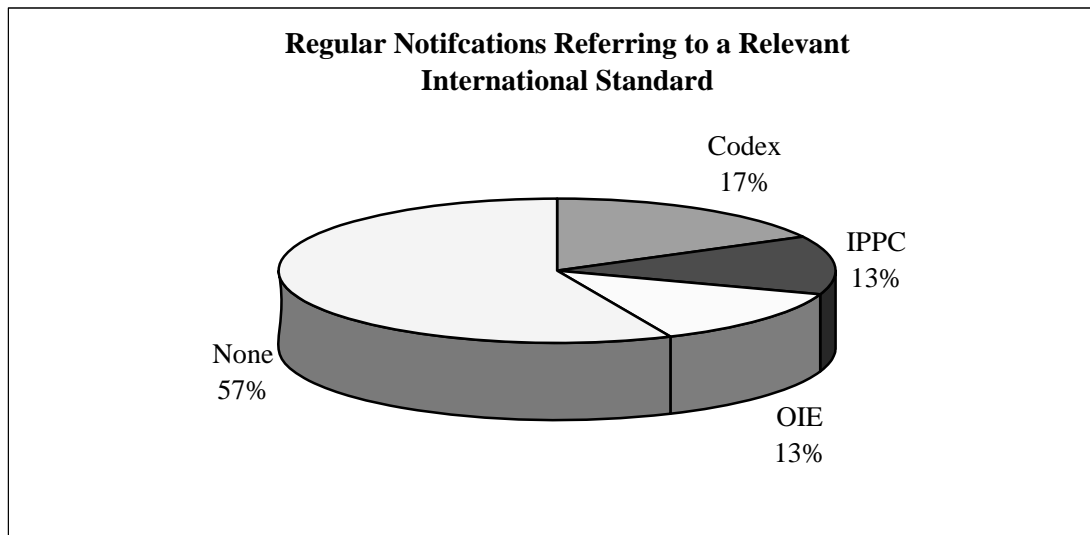
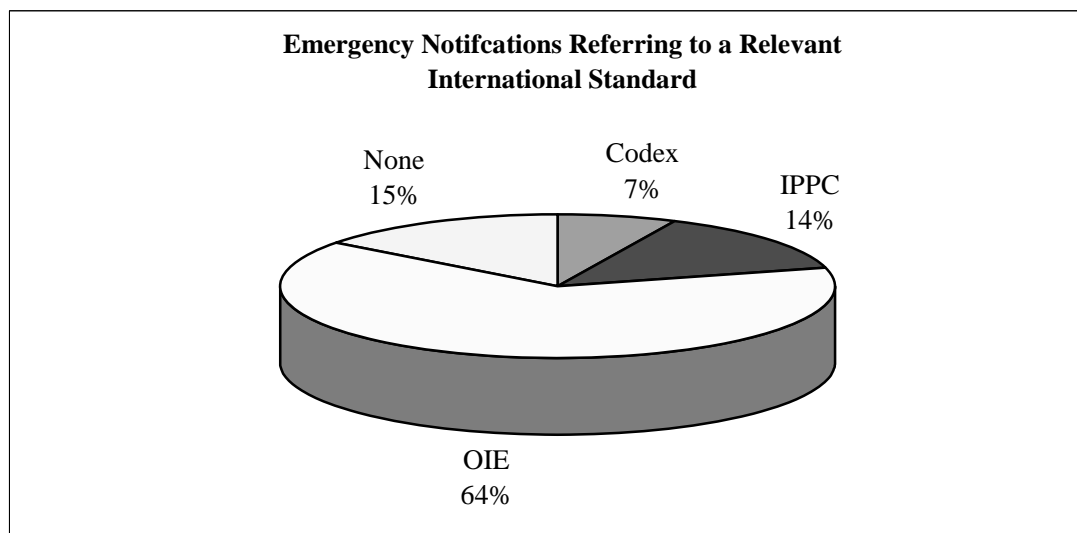


Figure 6



30. The revised notification format includes a new entry asking whether the proposed regulation conforms to the relevant international standard. During the period from December 2008 through August 2009, 47 per cent of regular notifications have stated that there is a relevant international standard and of these 71 per cent have indicated that the proposed regulation conforms to the relevant international standard. For the same period, 55 per cent of emergency notifications have stated that

¹² The IPPC International Standard for Phytosanitary Measures (ISPM) No.15 on Guidelines for Regulating Wood Packaging Material in International Trade.

there is a relevant international standard and of these, 50 per cent have indicated that the proposed regulation conforms to the relevant international standard.

Proposed date of adoption/publication/entry into force

31. In accordance with paragraphs 1 and 2 of Annex B of the SPS Agreement, Members are obliged to ensure that all SPS regulations which have been adopted are published promptly and except in urgent circumstances, to allow a reasonable interval between the publication of a measure and its entry into force. Paragraph 3.2 of the Doha Decision on Implementation-Related Issues and Concerns¹³ states that this interval "shall be understood to mean normally a period of not less than 6 months".

32. The revised regular notification format contained in the 2008 Transparency Procedures includes a new field for entering the "proposed date of publication" while maintaining the existing fields for the "proposed date of adoption" and "proposed date of entry into force". In addition, it includes a default checkbox for a six-month interval between the publication and entry into force of a new measure.

33. However, for various reasons, only a limited number of regular notifications provide specific dates in these three fields. In some cases, such dates are not yet determined at the time of the notification. As provided for in the 2008 Transparency Procedures, notifying Members sometimes follow up on their original notification with an Addendum to alert Members to the adoption, publication, or entry into force of a previously notified measure.

34. For the period from December 2008 through August 2009, 33 per cent of notifications included a specific date for adoption, 26 per cent for publication, and 35 per cent for entry into force. During the same period, only 26 notifications (six per cent) had selected the checkbox for a six month interval between the publication and entry into force of a measure.

Final date for comments

35. Annex B, paragraph 5 of the SPS Agreement provides that notifications should take place at an early stage, when amendments can still be introduced and comments taken into account. The 2008 Transparency Procedures state that a 60-day comment period should be provided with respect to regular notifications. An analysis of the notifications issued during the 27-month period of June 2007 through August 2009 shows, in Table 4, that 26 per cent of notifications have not provided a comment period. For those that do provide comment periods, these average 49.8 days when calculated as the difference between the date of circulation of the notification and the deadline or final date for comments. A more detailed analysis of the data shows that developing country Members provide a longer comment period on average than developed country Members (51 days compared to 49 days). However, it is important to note that as a percentage of their total regular notifications, developing country Members specify a comment period at a lower frequency than developed country Members.

36. The 2008 Transparency Procedures have further elaborated on the 60-day comment period. Where domestic regulatory mechanisms allow, the 60-day comment period should normally begin with the circulation of the notification by the WTO Secretariat. The revised formats also offer a checkbox option for such a 60-day comment period to encourage Members to follow this recommendation.¹⁴ During the period from December 2008 through August 2009, this checkbox has been selected in 34 per cent of notifications.

¹³ WT/MIN(01)/17.

¹⁴ See G/SPS/7/Rev.3, para.13.

37. It should be noted that no comment period needs to be provided in the case of trade facilitating measures. The 2008 Transparency Procedures include a new tick box for specifying whether the notification concerns a trade facilitating measure. From December 2008 through August 2009, 19 per cent of notifications have been identified to be trade facilitating. In addition, as there is no obligation to notify measures if their content of which is substantially the same as that of an international standard, no comment period is expected for this category of measures. The table below lists the number of notifications that didn't have a comment period but specified that the measure was trade facilitating or based on the relevant international standard.

Table 4. Comment period provided in regular notifications (June 2007-August 2009)

All Members		
	No.	Share
No. of Regular Notifications	1,655	-
Comment Period Not Indicated / Not Available	434	26%
Comment Period Ends before Distribution Date	21	1%
Comment Period Available	1,203	73%
Average Comment Period provided	49.8 days	
Developed country Members		
	No.	Share
No. of Regular Notifications	650	-
Comment Period Not Indicated / Not Available	73*	11%
Comment Period Ends before Distribution Date	17	3%
Comment Period Available	562	86%
Average Comment Period provided	49.4 days	
*Out of the 73 Not indicated / Not Available: 8 were trade facilitating measures; 20 specified that comments could be submitted anytime		
Developing country Members		
	No.	Share
No. of Regular Notifications	1,005	-
Comment Period Not Indicated / Not Available	361**	36%
Comment Period Ends before Distribution Date	4	0%
Comment Period Available	641	64%
Average Comment Period provided	51.2 days	
**Out of the 208 Not indicated / Not Available: 2 were trade facilitating measures; 4 specified that measures were based on international standards; 3 specified that bilateral consultation had already taken place; 3 specified that comments could be submitted anytime		

Text available from

38. While Members are obligated to notify other WTO Members of draft new or changed measures, they are not required to submit the text of the relevant regulations along with their notifications. However, Members have repeatedly raised concerns in the SPS Committee regarding the difficulties of accessing the actual text of notified regulations, which are described only in summarized form in notifications. Members have also pointed out that the process of receiving the texts of regulations reduces the period actually available for providing comments. In an effort to address these concerns and facilitate access to notified draft regulations, the Secretariat launched a

new facility on 1 February 2008. Members may, on a voluntary basis, provide the Secretariat with an electronic version of the text of the notified regulation as an attachment to the notification format. The submitted text is then electronically accessible to other Members through a hyperlink in the notification format.¹⁵ From February 2008 through August 2009, about 13 per cent of notifications have provided the full text or a summary of their notified regulations using this facility. Members may wish to remind their notification authorities of the availability of this facility.

39. Some Members include an hyperlink to their own electronic version of the notified regulation as part of the text of the notification.

Reasons for addenda to regular and emergency notifications

40. The 2008 Transparency Procedures have also added a new feature to the addenda to regular and emergency notification formats. Members are asked to select from a number of options regarding the reason for the Addendum. Table 5 below shows the share of each option for the period from December 2008 through August 2009:

Table 5. Reasons for addenda

Reason for addenda:	No.	Share %
Modification of final date for comments	31	14.4
Notification of adoption, publication or entry into force of regulation	124	57.4
Modification of content and/or scope of previously notified draft regulation	38	17.6
Withdrawal of proposed regulation	10	4.6
Change in proposed date of adoption, publication or date of entry into force	9	4.2
Change in period of application measures	1	0.5

Notification keywords

41. With the SPS IMS, all notifications can also be categorized according to a list of approximately 60 predefined keywords, which describe issues appearing frequently in notifications. The CRN has assigned these keywords since 2003. These keywords assist searching for notifications in certain areas. The keywords which have been most frequently assigned by the CRN to regular notifications are: pesticides, maximum residue limits, quarantine measures, food additives, pests, and risk assessment. For emergency notifications, the most frequent keywords are: avian influenza, regionalization, foot and mouth disease, quarantine measures, pests, and BSE.

IV. RECENT EFFORTS TO ENHANCE THE BENEFITS FROM A TRANSPARENT SYSTEM

42. In light of the steadily increasing volumes, managing the flow of notifications, coordinating at the national level, and benefiting from a transparent system has become a challenge for Members. The replies to a Questionnaire in 2007 on the Operation of Enquiry Points and National Notification Authorities indicates that this is one of the areas where Members are looking for technical assistance and guidance on best practices.¹⁶

¹⁵ See G/SPS/7/Rev.3, para. 22 and Annex C.

¹⁶ See the Analysis of Replies to the Questionnaire on the Operation of Enquiry Points and National Notification Authorities (G/SPS/GEN/751/Rev.1) for further elaboration on this issue.

43. There have been some recent efforts to address this issue. The public version of the SPS IMS was launched in October 2007. Its trilingual interface allows access to the most recent information on notifications as well as on Enquiry Points and National Notification Authorities. It also includes information on specific trade concerns and other SPS documents. It facilitates the conduct of searches according to specific needs/interests and also the preparation of reports/summaries which can be shared with interested stakeholders. The WTO Secretariat has provided demonstration sessions on the SPS IMS during the SPS Committee meetings and during its technical assistance programmes. It has also responded to ad hoc requests from Members and other interested parties for assistance.

44. The Secretariat has also established a mentoring mechanism which aims to bring together those individuals who are fulfilling the functions of Enquiry Points and Notification Authorities in different Members.¹⁷ The objective of this voluntary procedure is to assist Members in not only implementing their obligations with respect to the transparency provisions but also in benefiting from their rights. So far 18 Members seeking mentoring assistance have been matched with 9 Members offering mentoring assistance. Members offering mentoring assistance are Argentina, Australia, Chile, China, Colombia, European Communities, New Zealand, Switzerland, and the United States.

45. In addition, New Zealand, with the assistance of Australia and the Secretariat, has developed a practical Manual on the operation of Enquiry Points and Notification Authorities. It includes guidance on how to prepare a notification, how to manage incoming notifications, how to alert stakeholders, and how to draft some standard letters. This manual is now available in English, French and Spanish. Hard copies can be requested from the WTO Secretariat and electronic copies can be downloaded from the SPS gateway of the WTO website.¹⁸

46. The training and technical assistance activities of the WTO Secretariat on the SPS Agreement also devote a significant amount of time to transparency issues. In addition, the Standards and Trade Development Facility (STDF) has funded various projects to increase transparency by enhancing inter-agency coordination at a national and/or regional level, as well as strengthening linkages between government agencies and the private sector. The STDF is also leading a study to examine national SPS coordination mechanisms in Africa as a means to identify factors that contribute to successful coordination mechanisms and how they could be replicated elsewhere.

V. OTHER ASPECTS RELATING TO TRANSPARENCY

47. As indicated in the introduction, there are a number of areas where the Secretariat is not in a position to provide an overview. These include questions such as the following:

- To what extent are Members publishing a notice at an early stage regarding proposals to introduce a particular regulation? (Annex B, paragraph 5(a))
- To what extent are translations into English, French or Spanish of proposed regulations available? (Annex B, paragraph 8)
- How quickly do Members respond to requests for documents or other information? (Annex B, paragraphs 3 and 5(c))
- To what extent are Members providing comments on notifications, and to what extent are these taken into account? (Annex B, paragraph 5(d))

¹⁷ See G/SPS/W/217.

¹⁸ Go to http://www.wto.org/english/tratop_e/sps_e/transparency_toolkit_e.htm

48. These are areas where Members have occasionally shared their experiences with the SPS Committee. However, as this information is not provided systematically, it has not been possible to include further details on these questions. Members are encouraged to complement this overview document through submissions to the SPS Committee regarding their own experience in matters related to the transparency provisions of the SPS Agreement.
