

WORLD TRADE ORGANIZATION

RESTRICTED

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**Working Party on the
Accession of Saudi Arabia**

ACCESSION OF THE KINGDOM OF SAUDI ARABIA

Additional Questions and Replies

Corrigendum

The Ministry of Commerce of the Kingdom of Saudi Arabia has resubmitted additional replies to the following questions reproduced in document WT/ACC/SAU/35.

¹ English only

II. ECONOMY, ECONOMIC POLICIES AND FOREIGN TRADE

2. Economic Policies

(a) Main directions of ongoing economic policies

Petroleum

Question 4

Why is the rebate applied to the minimum export price reported in that quarter and not to the average price?

Reply

This is not a rebate, it is a discount off the minimum export price and is done purely for accounting purposes and to avoid the complaints from the customers of applying averages, since the export price is a contract price set by the exporting entity.

Question 6

Is the "stated objective of diversifying Saudi's economic base and lessening dependence on the export of raw material" (WT/ACC/SAU/3c page 4) to be taken to mean that the production associated with this rebate is meant for export only? If not, how much of this production will be absorbed by the Saudi market?

Reply

This is not a rebate and the Council of Ministers' decision No. 68 did not specify the discount for export industries. It is intended for local industries, whether Saudi or foreign owner, using it as feedstock whether their output is for domestic or export markets. The proportion to be absorbed by the domestic market depend on economic and population growth, investment patterns and many other factors.

3. Internal Policies Affecting Foreign Trade in Goods

(b) Technical barriers to trade

Food standards and shelf life

Question 58

In relation to questions 189 to 195 and 200 to 258 in WT/ACC/SAU/29, relating to shelf life, we note that there is widespread acceptance of manufacturer determined shelf life, based on a body of recognized scientifically based literature. Will Saudi Arabia accept manufacturer determined shelf life where applicable?

Reply

A WTO Member has the right to engage in own shelf life determination as an SPS measure for perishable food products and as a TBT-technical regulation appropriate to the Member's climatic and infrastructural conditions for shelf stable food products. In its determination of appropriate shelf life periods, Saudi Arabia relies on available scientific studies by specialized, credible and

internationally recognized bodies and on references, based on research conducted for academic or industrial/commercial purposes. The fact that part of this research is conducted by manufacturers demonstrates that Saudi Arabia takes into consideration differences in manufacturing and packaging processes inherent in the food industry.

Question 59

Can Saudi Arabia provide an assurance that shelf life regulations applied to products destined for areas where adequate transport, storage facilities exist are not more restrictive than necessary?

Reply

Saudi Arabia's shelf life for perishable food products is determined based on the assumption of a controlled storage temperature (by refrigeration or freezing) in accordance with internationally recognized norms. As for shelf stable products stored under room temperature, the main consideration for its determination is the prevailing climatic conditions of Saudi Arabia. The inadequacy or abuse of the transport and handling conditions are only considered minor factors and are diminishing in relative importance as infrastructural conditions in the country improve progressively.

Question 60.

Do the Administrative arrangements and evaluation process outlined in WT/ACC/SAU/27 include provision for "acceptance SPS measures applied by other countries, including manufacturer data where these may differ from Saudi Arabian standards but where the exporter can objectively demonstrate that the standards are appropriate to Saudi Arabia's level of SPS protection"?

Reply

Shelf life is considered partly as an SPS measure only for perishable food products. By its definition, SPS measures are taken by countries (governments) whenever they choose to interfere in insuring an appropriate level of SPS protection. Manufacturer determined shelf life determination that may be followed in other countries are neither uniform nor can be considered as official SPS measures by governments. Nevertheless, shelf life periods of perishable food products are not applied or imposed unilaterally by the government of Saudi Arabia, but rather adopted in accordance with the same open process and code of good practice applicable to standards, i.e. through technical committees entrusted with the preparation of the relevant shelf life standard whose diversified membership include representatives of the industrial and commercial sectors. These members can influence the decision on shelf life determination and ensure its responsiveness to the needs of the industry, not to mention the period afforded for consultation and comment by any concerned parties. In addition, SASO administrative procedures and directives provide the opportunities for manufacturers to submit the scientific basis for their own determined shelf life to SASO at any time for evaluation. If these manufacturers can demonstrate objectively that their shelf life periods are appropriate to Saudi Arabia's level of SPS protection as well as the required food quality criteria, Saudi Arabia will revise its shelf life standards accordingly.

Question 61

(WT/ACC/SAU/29) The reply to question 200 states that "... final determination of shelf-life is made based on the studies for which " the stated storage conditions" most closely resemble Saudi Arabian conditions ... these conditions have been thoroughly investigated and surveyed ...

in a report entitled Proceedings of Symposium on the Transportation, Handling & Storage of Food Products to the Kingdom, Part I and II dated 26-28 February 1989".

Please explain how the appearance of a date on a food package alone will prevent, directly or indirectly, the risk of food contamination in the Government of Saudi Arabia's regulated food products.

Please explain what specific food safety risk the Government of Saudi Arabia is attempting to prevent by displaying the shelf-life date on a food product package and what impact non-fulfilment, i.e. the absence of a shelf-life date, would create.

If the Government of Saudi Arabia justifies the use of its' shelf-life measures as necessary to protect the health and safety of its consumers, on a product by product basis, please provide the generally accepted scientific data which supports why each shelf-life date has been applied to each of the Government of Saudi Arabia's regulated products?

Because quality attributes can change (sometimes rapidly) in some food products based on the type of product, how it is handled, packaged, and stored throughout distribution, please illustrate:

How the appearance of a date on a food package can ensure the quality of the Government of Saudi Arabia's regulated food products? What other methods does the Government of Saudi Arabia use to ensure quality?

What is the risk non-fulfilment would create, i.e. the absence of a shelf life date?

Saudi Question 203 Reply states that "Codex defines "use-By-Date" as "the date which signifies the end of the estimated period under any stated storage condition after which the product probably will not have the quality attributes normally expected by the consumer ... the term "unacceptable to the consumer" and "unit for human consumption" respectively correspond to and are self evident from the above definition..."

"Unacceptable to the consumer" relates to sensory and quality attributes while "unfit for human consumption" relates to the products safety i.e. risk of contamination which makes the product unsafe or harmful to the consumer.

Does the Government of Saudi Arabia use shelf life dating as the primary means by which to control and ensure the safety and quality of both domestic and imported regulated food products?

Reply

Saudi Arabian standards for food products are adopted either entirely or at large from the Codex Code. They cover the various factors that affect food quality and safety. The purpose of Saudi Arabia's date marking is to ensure that products which meet the required criteria at time of production, and thus were initially safe and wholesome, maintain their microbiological, sensory and nutritional qualities during the shelf life period at the stated storage temperature. Thus, Saudi Arabia does not rely on date marking alone as is stated.

Saudi Arabia had previously stated in its WTO submissions that shelf life is both a TBT (quality) issue as well as an SPS (food safety) issue. In this course, it is necessary to make the following distinction:

(a) Perishable food products:

These products carry the inherent risk of concurrent deterioration of food safety and quality properties, and thus date marking plays a contributing role in the maintenance of food safety; this gives it the priority to be classifiable as an SPS measure in addition to its TBT classification as technical regulation for quality of health. By and large, perishable food products are stored under controlled and uniformly specified temperature and humidity conditions (refrigeration or freezing). In this case, Saudi Arabia predominantly adopts the shelf life periods determined by the scientific studies of internationally recognized specialized institutes listed as references in the attachment to WT/ACC/SAU/27 for each individual product, without deviation. In limited cases noted (Labneh, chilled meat etc.), Saudi Arabia conducted the studies itself and provided copies to the WTO. Thus, Saudi Arabia has totally met the scientific justification criteria required by the SPS Agreement. Nevertheless, a WTO Member who believes that any shelf life period(s) are not objectively determined in accordance with scientific justification, is always welcome to submit the relevant technical grounds. SASO is willing to conduct a joint technical study or research for each individual case and make the required amendments in its shelf life determinations.

(b) Shelf stable food products:

These products generally remain safe for some time after food quality properties start to deteriorate. Thus, date marking of shelf stable products contributes mainly to the maintenance of food quality, and falls under the provisions of TBT Agreement. The Agreement grants Members the right to prepare and adopt standards that are "appropriate" to the Member's "fundamental climatic, infrastructural and technological conditions". Shelf stable products are normally stored under room/ambient temperature conditions. In the case of Saudi Arabia, shelf life determination of these products has to take into account the prevailing high ambient temperatures in the country and the wide fluctuations between day and night and different seasons, ranging between -10°C to 55°C averaging 33°C on a year round basis, not to mention the extreme variations in relative humidity. In contrast, shelf life for shelf stable products determined by most food exporting countries are based on an assumed ambient storage temperature not exceeding 25°C. A study conducted by Natic Research for the United States Army found that shelf life periods of shelf stable products under a constant storage temperature of 32.22°C are generally half those determined under 21.1°C, thereby confirming Arrhenius Equation and the Q₁₀ rule used by researchers. Nevertheless, comparison of Saudi Arabia's actually determined shelf life periods with the results of the study shows that they generally fall in the mid-range between the periods determined by the study at these two storage temperatures. For several products, Saudi Arabia's shelf life period coincided with the study's 21.1°C condition, with few exceptions coinciding with the 32.22°C condition (e.g. highly risky products such as baby food). Thus, Saudi Arabia's shelf life determinations for shelf stable products are in fact less strict than warranted by its climatic and infrastructural conditions.

Question 62

(WT/ACC/SAU/29) Responding to the Government of Saudi Arabia's definition of CODEX shelf-life guideline, CAC/VOL VI-Ed. 1 states the purpose of date marking, is to give the consumer a date which will provide information about the expected quality of the product provided that it has been properly stored. This does not mean that date marking guarantees either the acceptability or the safety of the product. Unquote. Under definition of types of date marking CODEX also defines: "sell-by-date", "date of minimum durability ("best before"), in addition to "use-by-date" marking. In general shelf-life is the period during which the food keeps its microbiological and sensory quality at the specific temperature of storage.

Page 9 (b), paragraph 4 - The compelling argument made by SASO, is that, quote ... the most hazardous effect of temperature, which leads to rapid quality deterioration and microbiological decay of foods, is temperature, handling and storage.

This is true, however, why is the producer of an imported product being held responsible for the Saudi food handlers inadequate methods of storing or transporting the product once in the Kingdom?

Page 14 (b) - The scientific studies specified in this document are done at a constant temperature to evaluate and estimate shelf-life. These studies do not include testing for temperature abuse specific to Saudi Arabia.

How does Saudi use these studies in determining its existing shelf life?

Saudi Arabia has the right to require expiration dates that meet the standards set by standard testing methods; however, they do not have the right to expect the rest of the world to determine how much temperature abuse a specific product can withstand in Saudi Arabia based on compliance to triggers beyond their control and which fall under the authority and capability of the Government of Saudi Arabia to take corrective enforcement action to prevent.

Saudi Arabia seems to impose on the foreign manufacturer the added obligation of being responsible for the irresponsible handling and transportation of their product once it has entered the Kingdom, hence the half life/shelf life date requirement on imports.

Reply

The same shelf life periods are applied on domestic and imported food products alike. In the case of shelf stable products, the TBT Agreement grants Saudi Arabia the right to take into account the effect of the country's specific climatic and infrastructural conditions. Climatic conditions is considered as the major essential factor by SASO in determining shelf life. Transportation, storage and handling conditions and abuses are only considered as minor factors and are diminishing in relative importance as infrastructural conditions in the country improve progressively.

Question 63

(WT/ACC/SAU/29) Question 204 Reply states that the Government of Saudi Arabia has identical shelf-life periods and marking requirements applied for domestic and imported food products... on a non-discriminatory basis... and that the half the shelf life requirement for imported foods is not an SPS issue, but rather a requirement for the marketing of the food, i.e. to allow enough time for the exporter to ship and the importer time to facilitate the distribution and marketing to all regions of the Kingdom.

How does the Government of Saudi Arabia compensate for the geographic advantage of domestically produced regulated food products mandatory shelf-life measures when these same measures impose an unfair burden on imported foods?

If half-life/shelf-life is not an SPS issue and it does not support the quality attributes of the product, how does the Government of Saudi Arabia justify the punitive nature of this requirement on imported foods i.e., if half the shelf life does not remain on the product the imported product is denied entry into the Kingdom?

Saudi Arabia asserts that it accepts the CODEX definition of shelf life, then why does the Government of Saudi Arabia impose a half-life/shelf life date requirement (i.e. half the shelf-life must remain on the product before it will be allowed entry) on imported foods.

Reply

Regarding the requirement of half shelf life validity at time of entry of food products, Saudi Arabia has previously explained that this has nothing to do with the Codex definition of shelf life, but is purely a requirement for the marketing of food products in accordance with GATT Article XI; it ensures that at least 50 per cent of shelf life validity remains on food products to allow for reasonable and adequate time for the distribution and marketing of these products throughout Saudi Arabia. The first 50 per cent of shelf life allowed to be lost before entry exceeds the time required for shipping from the most distant country from Saudi Arabia, thereby accounting for the geographical disadvantage inherent in imported products, and thus is not a punitive requirement as stated. Even with the half shelf life requirement imposed, the local distribution system and Saudi consumer are still at a disadvantage when buying imported food products versus domestically manufactured products whereby the latter can provide full shelf life and freshness utility. Needless to mention, food products arriving in Saudi Arabia with inadequate or near expiry remaining shelf life will put an unreasonable strain on the distribution and marketing system and may wind up having to be wasted, thereby inflicting unnecessary losses on the national economy.

Question 65

Why does SASO use standards experiments of other countries which do not the Government of Saudi Arabia's special climate conditions (i.e. Annex 4 list, "References used for Evaluation of Shelf-Life ...," Netherlands for Food Group: Milk and Milk Products)?

Reply

As stated above, only shelf stable foods are subject to Saudi Arabia's special climatic conditions. Most milk and milk products food group are stored under controlled temperature (by refrigeration or freezing), and excluding any transportation, handling, or storage abuse, are not affected by climatic conditions. Thus, shelf life studies for these products conducted in other countries are applicable to any other country including Saudi Arabia and can serve as scientific references.

ICCP

Question 68

We seek further details on the charging regime under the ICCP and any changes that may be necessary to bring it into conformity with GATT 1994 Article VIII?

The subject of the ICCP's fees has been fully clarified and exhausted in several previous documentation submitted to the WTO. For a comprehensive coverage of this issue please refer to Section 5 of Chapter IV of WT/ACC/SAU/26, and to R1 of "Saudi Arabia's Response to Questions from Canada following the May 29-30 Working Party" submitted to the WTO as supplementary document dated 26 November, 1997 (circulated informally). Furthermore, footnote 1 of Article 1.4 of the PSI Agreement states that exporting WTO Members are under no obligation to allow government entities of importing Members to conduct preshipment inspection activities on the exporting Member's territory. This constitutes an implicit acknowledgement by the Agreement of the vital and indispensable role of PSI companies in implementation of the Agreement, and that the only course open to importing Members is to contract with those companies for carrying out inspection on their

behalf. With such ultimatum prescribed by the Agreement, it is the collective responsibility of the WTO, and not the importing Member alone, to ensure that the general practices and code of conduct prevailing within the PSI industry are in accordance with WTO rules, regulations and principles, including appropriateness of the fees structure. In fact, the WTO WP is currently investigating the practices of PSI companies, and in case the WTO determines an alternative fee structure for the industry, Saudi Arabia will be in a position to impose such structure on the PSI companies contracted with.

Reply

Question 78

Exports from the manufacturer/from an independent exporter. The ICCP type approval regime foresees slightly different type approval procedures depending on whether the product was exported directly by a manufacturer or via a separate trader, There are no grounds in the TBTA to differentiate in this way between like products. We therefore urge Saudi Arabia to merge the two procedures into one by applying to all products the procedure applied to manufacturers who exported. This would involve as a consequence the deletion of those paragraphs in the ICCP guidelines referring to products coming being presented by an importer/exporter who is not the manufacturer. Our understanding has been that since there are no significant differences in treatment such a modification would be considered positively.

We would welcome Saudi Arabia's views on whether this change can be made.

Reply

In accordance with clause 5.1.1 of Article 5 of the TBT Agreement, equal conditions of access for suppliers of like products need only be applicable in comparable situations. A Type approval license is only granted to manufacturers with approved quality system such as ISO 9000. Exporters normally deal with several manufacturers and markets with varying requirements, and may be involved in assembly, conversion or repacking outside the control of the type approved manufacturer which may change the original characteristics of the product and render it non-compliant. Moreover, exporters do not necessarily have quality management systems with proper controls to ensure that only the Saudi version of the product is the one being shipped. Type approved products are not necessarily marked with SASO quality mark and thus may not be directly traceable to the original manufacturer or readily differentiable from other markets' versions. The lower level of confidence justifies different corresponding proportionate measures. The exporter is still entitled to get the benefit of waiver of routine PSI, by obtaining the authorization of the manufacturer who owns the license. The CoC can then be issued by either the manufacturer or the SCO.

Question 79

Transparency: We suggest that the ICCP should explicitly state that a single uniform concordance of Saudi and other equivalent standards exists, is regularly updated by SASO which is solely responsible for setting standards, and is available from any SASO Country Office. We would also like a clear statement in the ICCP that the Saudi Arabian government is the body determining technical regulations, standards, conformity assessment procedures and their application, and that companies applying such rules on products prior to export are acting in conformity with those rules established by the government. This is to ensure that different test houses, inspection services cannot deviate from the centrally established rules, standards, and assessment procedures.

The concordance of standards should also identify for which standards a third party conformity assessment procedure is or is not required, our understanding being that there are products which must meet certain standards but for which there is no ICCP procedure.

Finally, the ICCP should identify describe in more detail the nature of the conformity assessment procedures applicable and identify the relevant ISO guides or other standards governing these procedures.

Reply

Transparency: In accordance with Chapter 2 - Definition of Terms of the ICCP CPG, it is clear from the definitions of *Certificate of Conformity*, *International Conformity Certification Program*, *Regional Licensing Centre (RLC)*, *SASO*, and *SASO Country Office (SCO)* that the RLCs and SCOs are carrying out their duties on behalf of SASO/MOC under the rules of the ICCP. The adherence of these bodies to these rules, and their accountability to SASO/MOC is further reflected in the second paragraph under the heading of SASO Program Management on page 14 of the CPG, as well as the full recourse to the Saudi Arabian authorities provided for in the grievance procedures included as attachment to Appendix C. As for equivalency of standards, the second paragraph of Chapter 1 - Introduction states: "Compliance with the relevant SASO standards, or approved equivalent alternatives, results in the issue of a CoC". The same thing is reiterated in the first paragraph of Chapter 3 - Procedures for Product Compliance. The term "approved" is intended to signify approval by SASO. All these measures are in place to ensure that bodies designated and entrusted with the implementation of the Program do not deviate from the centrally established rules, standards and assessment procedures.

Question 81

Proportionality: We find it difficult to accept that ICCP products have to undergo not only product type approval but also factory quality system certification. This double barreled certification is in virtually all parts of the globe reserved only for very high risk products such as pharmaceuticals and medical devices and applied to lower risk goods is a disproportionately heavy means of regulation. Where it can be demonstrated that some form of third party certification is necessary, manufacturers should be given a choice between product or quality system certification but not have to run the gauntlet of both.

We have already explained that international standards related to quality system certification already contain sufficient checks on the product related aspects to provide the guarantees of product conformity necessary.

Secondly, we question the justification for annual licensing of approved manufacturing sites. This again is a disproportionate measure and is more trade restrictive than necessary. Even if Saudi Arabia were to amend the ICCP to provide that manufacturing quality system certification is an alternative to product certification a requirement for annual licensing is over-regulation. Standard international practice for re-inspection of quality systems in high risk areas such as pharmaceuticals production is two to four years, It is also unclear as to whether "licensing" equates to quality system inspection or not. If it does not then as a procedure it does not seem necessary. We would appreciate clarification on this point.

Thirdly, we question the justification for pre-market certification of consumer electronics/electrical appliances and processed foodstuffs- this runs against international practice and (in the case of foodstuffs) the principles established by FAO and WHO, and in the HACCP system with which Saudi Arabia is familiar. Border control of processed foodstuffs does not in itself offer guarantees of health and safety since this is to ignore the whole chain of

production conditions, storage, distribution, retail conditions etc. We suggest that Saudi Arabia consider removing pre-market certification for these products.

Fourth, concerning inspection and certification of new tyres, the cost of the procedures for this have been a source of concern for tyre manufacturers. A detailed explanation of the concrete procedures and costs of approval for this product would be appreciated.

Fifth, concerning certification of perfumes. We have been told of new requirements that display, not-for-sale samples of perfumes are subject to the full certification requirement. Saudi Arabia has however said that this was not the case. examples of perfumes were exempt. Such exemptions should, we submit, be specified in the ICCP guidelines.

A second issue relates to requirements for soaps containing perfumes which are subject to the full ICCP requirements for cosmetic products (3307 of the Harmonized system), and are not treated like other soaps (HS 3401), This is a costly and heavy procedure for exporters. We would appreciate Saudi Arabia's considering an adjustment of its procedures - namely to treat perfumed soaps as soap falling under 3401 and therefore exempt it from ICCP – to remove this problem.

Reply

The PSI Agreement facilitates the conducting of inspection procedures on a preshipment basis rather than on a post-market sampling basis, particularly for developing countries. By providing "the possibility to have conformity assessment activities undertaken at the site of facilities ...", the PSI process totally satisfies the "access" requirements of TBT Article 5.1.1, whereas post market sampling does not (refer to WT/ACC/SAU/26 Chapter III paragraph 2). Moreover, the core of the Registration process under ICCP is substantiated suppliers' declaration. Thus, the ICCP's compliance verification option of Registration plus Preshipment Inspection, available for exporters of any regulated products, is equivalent to supplier's declaration plus random sampling applied in other developed countries. As such, it is in accordance with international practice and totally respects the TBT Agreement requirement to adopt the least trade restrictive procedure.

The objective behind the ICCP's Type Approval Licensing is to provide exporters with an option "allowing the import of their products with the minimum of intervention", mostly through exemption from Preshipment Inspection. In accordance with the principle of proportionality, this maximum laxing of compliance verification should be associated with the highest level of confidence that the product can convey as to its conformity to Saudi requirements. Accordingly, Model Third Party Certification (ISO Guide 28) was adopted, as it is "the most comprehensive" conformity assessment procedure that can provide such a confidence. The ICCP Comprehensive Procedures & Guidelines clearly stipulate "Exporters may choose the route most appropriate to their product range and frequency of exports". Thus, Type Approval Licensing is not mandatory for any regulated product regardless of its risk classification. Exporters who do not see worthwhile benefits in Type Approval Licensing for their products are always welcome to adhere to the Registration/PSI option. As for providing a choice between product and QS approval, please refer to details in our reply to the European Community's question 5 submitted to the WTO as supplementary document dated 26 November, 1997 (circulated informally), which demonstrates the shortcomings in such a choice, and the doubtful success of the EC system. In fact, many individual EC countries' marking systems, such as BSI's Kite Mark, as well as other developed countries such as Japan's JIS Mark are based on evaluation and approval of both the product and the QS.

Concerning certification of perfumes, please refer to Saudi Arabia's reply to Q9 of "Response to EC comments on draft ICCP Procedures & Guidelines submitted to the WTO as supplementary document dated 26 November, 1997 (circulated informally).

Regarding the regulation of soaps under the ICCP, Saudi Arabia has adopted the definition of cosmetics prescribed by the EC Cosmetics Directive 76/768/EEC, which classifies toilet soaps and deodorant soaps as cosmetics, regulated by the ICCP. The HS Codes are only indicative and not the basis for whether the product is regulated or not. Even though perfumes and cosmetics are listed under one product category, only standards pertaining to the particular product are applicable. For cosmetic soaps, the applicable standards are SSA 298, 299, 300, 301, 302, 303, 304, 492 and 493.

Question 87

We are particularly concerned about the Saudi practice to differentiate between manufacturers who export directly to Saudi Arabia and those who are not themselves manufactures.

Reply

In accordance with clause 5.1.1 of Article 5 of the TBT Agreement, equal conditions of access for suppliers of like products need only be applicable in comparable situations. A Type approval licence is only granted to manufacturers with approved quality system such as ISO 9000. Exporters normally deal with several manufacturers and markets with varying requirements, and may be involved in assembly, conversion or repacking outside the control of the type approved manufacturer, which may change the original characteristics of the product and render it non-compliant. Moreover, exporters do not necessarily have quality management systems with proper controls to ensure that only the Saudi version of the product is the one being shipped. Type approved products are not necessarily marked with SASO quality mark, and thus may not be directly traceable to the original manufacturer or readily differentiable from other markets' versions. The lower level of confidence justifies different corresponding proportionate measures. In order for the exporter to get the benefit of waiver of routine PSI, he must obtain the authorization of the manufacturer who owns the licence. The CoC can then be issued by either the manufacturer or the SCO. This does not preclude the case whereby exporters totally devoted to a licensed manufacturer can be treated the same as manufacturers.

VII. INSTITUTIONAL BASE FOR TRADE AND ECONOMIC RELATIONS WITH THIRD COUNTRIES

Preferential Trading Arrangements

Question 135

Have the texts of these agreements been notified to the CRTA?

Reply

Saudi Arabia is not yet a member. It will notify these arrangements upon becoming a WTO member.
