



11 November 2021

(21-8559)

Page: 1/1

Committee on Sanitary and Phytosanitary Measures

Original: English

**CHINA'S ADMINISTRATIVE MEASURES FOR REGISTRATION OF OVERSEAS PRODUCERS
OF IMPORTED FOODS AND ADMINISTRATIVE MEASURES ON IMPORT
AND EXPORT FOOD SAFETY – [SPECIFIC TRADE CONCERN 485](#)**

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](#).

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1. The United States remains concerned about the China's Decrees 248 and 249, previously notified respectively to the TBT and SPS Committees as *Administrative Measures for Registration of Overseas Producers of Imported Foods* – [G/TBT/CHN/1522](#) (Administrative Registration Measures) and *Administrative Measures on Import and Export Food Safety* – [G/SPS/CHN/1191](#) (Administrative Import Measures).
 2. These decrees mandate additional certification, audit, and inspection documents and procedures beyond what is already determined necessary for higher-risk products.
 3. This will likely create major trade disruptions for many countries that export food and agricultural products to China, and negatively affect Chinese consumers' access to a broad range of imported food products.
 4. We also remain concerned that China has yet to respond to previous requests for scientific justification and clarification to help inform Members how to implement these measures.
 5. To that end, the implementation date of 1 January 2022 is not feasible and we request a postponement of at least 18 months before China implements these Decrees. During this time we request that China communicates with foreign food manufacturers and relevant foreign government regulators about the scope and application of the new Decrees. We are also seeking a commitment that trade will not be interrupted during this time.
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