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Committee on Sanitary and Phytosanitary Measures

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**CHINA'S ADMINISTRATIVE MEASURES FOR REGISTRATION OF OVERSEAS  
MANUFACTURERS OF IMPORTED FOOD (26 NOVEMBER 2019)  
– [SPECIFIC TRADE CONCERN 485](#)**

SUBMISSION BY THE UNITED STATES OF AMERICA

The following submission, received on 27 March 2023, is the statement made by the United States of America at the 22-24 March 2023 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 deeply concerned with China's lack of scientific justification or explanation of how Decrees 248 and 249 address food safety and public health concerns.
  2. In its response to the United States and other members during the November 2022 SPS Committee meeting, China did not respond to any of the substantive concerns raised and still has not provided the scientific basis or risk assessments that informed the development of these Decrees, which the United States and other Members have repeatedly requested.
  3. The United States once again requests that China provide this vital information.
  4. In addition, we again note that China's General Administration of Customs (GACC) appears to require foreign competent authorities to maintain information in China's online system for each registered facility from their country producing certain categories of products. Such a requirement creates tremendous administrative burdens on foreign competent authorities without a clear connection to food safety outcomes. GACC should ensure that all facilities are able to self-register without foreign competent authority involvement or unreasonable information requirements.
  5. Finally, we note that GACC's deadline of 30 June 2023, for firms and competent authorities to complete the registration process is completely unrealistic. The actions GACC appears to request would take years to complete, if they are even possible at all. We request that China indefinitely suspend this deadline to allow trade to continue while China addresses outstanding concerns with these requirements.
  6. We maintain our availability to work with China on this issue and look forward to receiving the information that we have requested.
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