# WORLD TRADE

## **ORGANIZATION**

**G/SPS/GEN/378** 31 March 2003

(03-1808)

**Committee on Sanitary and Phytosanitary Measures** 

Original: English

#### REPORT OF THE ANALYSIS ON SPS NOTIFICATIONS IN 2002

### Submission by China

## Background

- 1. At the WTO/SPS Committee meeting in November 2002, the delegation of China offered to carry out an analysis on the implementation of the notification obligation under the SPS Agreement by WTO Members throughout the year of 2002 and to submit a proposal for amending the SPS notification procedures to the 26<sup>th</sup> Committee meeting in April 2003.
- 2. During the past few months, China collected, summarized and analyzed all SPS notifications submitted in 2002 and analyzed the issues raised by the statistical figures. Based on this work, China submitted a proposal for amending the SPS notification procedures (G/SPS/W/131).

### **General Introduction**

- 3. There were 145 Members of the WTO up to 31 December 2002. In 2002, 47 of these Members submitted a total of 663 SPS notifications.<sup>1</sup> The top ten Members in terms of the number of notifications submitted were: United States (222), Canada (53), European Communities (47), New Zealand (41), Korea (25), Colombia (21), Chile (21), Brazil (20), Mexico (19) and El Salvador (17). (See Annex Table 1.)
- 4. As a new member of WTO, China fulfilled the transparency obligations well. China notified 15 new SPS measures in 2002 and ranked twelfth in terms of the number of notifications. In addition, China also notified 140 existing SPS measures according to its commitments under the Protocol of Accession.
- 5. Of a total 673 notifications distributed in 2002, there were 374 routine notifications (55.6 per cent of the total number), 96 notifications of emergency measures (14.3 per cent), 162 addenda (24.1 per cent), 13 revisions (1.9 per cent), and 28 corrigenda (4.2 per cent).
- 6. Analysis of the items "Products covered" (Item 3) and "Description of content" (Item 6) in the notification format showed that the most popular issues covered by the notifications during 2002 included:
  - MRLs, accounting for 127 notifications (83 from the United States, 25 from Canada and 10 from the European Communities);
  - Food additives, accounting for 29 notifications (7 from the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu (TPKM), 7 from the United States, 4 from the European Communities and 4 from Japan);

<sup>&</sup>lt;sup>1</sup> Not including 140 notifications submitted by China according to the Protocol of Accession.

- BSE, accounting for 27 notifications (5 from the United States, 4 from China and 3 from Cuba):
- Foot-and-Mouth Disease, accounting for 21 notifications (3 from Peru);
- GMOs, accounting for 12 notifications (4 from New Zealand);
- Avian Influenza, accounting for 12 notifications (4 from Colombia); and
- New Castle Disease, 10 notifications.
- 7. Analysis of the item "Objective and rationale" (Item 7) indicated that, of all the notifications in 2002, the area of food safety, with 284 notifications, was the most serious problem; animal health, took second place with 130 notifications; plant protection was 116 notifications; protection of human health from animal- or plant-carried diseases was 64 notifications; and there were 39 notifications dealing with the protection of a country against other damages resulting from pests. (See Annex Table 2.)
- 8. The analysis showed a great difference in Members understanding and filling-in of Item 8 "Existence of international standard, guideline or recommendation". Some of the main problems can be summarized as:
  - (a) According to the provisions in Annex B of the SPS Agreement and the Recommended Transparency Procedures (G/SPS/7/Rev.2), choosing any international organization in this item means that a relevant international standard exists and the SPS measure notified is inconsistent with it. But in fact, some Members also notified SPS measures that were based on relevant international standards only for transparency. Although this practice was encouraged by the Committee, the present notification format does not take this situation into consideration and therefore it results in some misunderstanding.
  - (b) Most of the notifications did not reflect the difference between the notified measure and the international standard even if a relevant international standard did exist.
  - (c) EC Directives, US EPA regulations etc. were identified as "international standards" in some notifications.
  - (d) This item was not filled in.

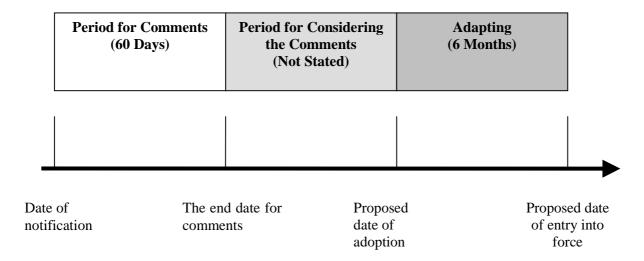
Considering the above, China made some suggestions for this item in its proposal for amending the SPS notification procedure (G/SPS/W/131).

### **Comment Period and Adapting Period**

- 9. The following definitions will make the analysis easier to comprehend (see Chart 1):
  - Date of notification: the date that WTO distributes the notification, i.e., the date at the top right corner of the notification format.
  - *Final date for comments:* the deadline before which the notifying Member accepts comments submitted by other Members, see item 12 of the notification format.
  - *Proposed date of adoption:* the proposed date on which the notifying Member adopts the notified SPS measure, see item 10 of the notification format.

- *Proposed date of entry into force*: the proposed date on which the notified SPS measure will take effect, see item 11 of the notification format.
- *Comment Period:* an interval from the date of issuance of the notification to the final date for comments. According to the Recommended Transparency Procedures, the comment period should be normally at least 60 days.
- *Comment-consideration period:* an interval between the final date for comments and the proposed date of adoption.
- Adapting period: an interval between the date of publication of the notified SPS measure and the date of entry into force, which normally should be not less than 6 months according to the Doha Ministerial Decision (WT/MIN(01)/17, para. 3.2).

**Chart 1 Four Time Points and Three Intervals** 



- 10. The statistics showed that only 79 out of 374 routine notifications (i.e. 21.1 per cent) allowed at least 60 days for comments, and 230 notifications (61.5 per cent) allowed a comment period of less than 60 days. The final dates for comments for 11 notifications (2.9 per cent) were earlier than the corresponding dates of notification. Under these circumstances, other Members could not enjoy their right to comment on notifications. Furthermore, there were no final dates for comments identified in 54 notifications (14.5 per cent). (See Annex Table 3.)
- 11. According to Paragraph 2, Annex B of the SPS Agreement:

"Except in urgent circumstance, Members shall allow a reasonable interval between the publication of a SPS regulation and its entry into force in order to allow time for producers in exporting Members, and particularly in developing country Members, to adapt their products and methods of production to the requirements of the importing Member".

Article 3.2 of the Doha Ministerial Decision further clarified: "Subject to the conditions specified in paragraph 2 of Annex B to the Agreement on the Application of Sanitary and Phytosanitary Measures, the phrase "reasonable interval" shall be understood to mean normally a period of not less than 6 months".

12. However, the notification format provides boxes only for the proposed date of adoption (Item 10) and proposed date of entry into force (Item 11); no box for the date of publication is

available. Generally speaking, the date of publication should not be earlier than the date of adoption. For the sake of our analysis, we assumed that all Members published their SPS measures on the same day as the measures were adopted. In other words, the date of adoption was regarded as the start of the adapting period when we conducted the analysis on the implementation of this 6-month period by notifying Members.

- 13. The statistics showed that only 14 notifications (3.7 per cent of routine notifications) provided at least 6 months for adapting, 128 notifications (34.2 per cent) provided an adapting period of less than 6 months and 232 notifications (62.1 per cent) did not state the date of adoption and/or the date of entry into force. (See Annex Table 4.)
- 14. Annex B of the SPS Agreement stipulates that comments from other Members should be considered seriously. Referring to the statistics, only 67 notifications (17.9 per cent) provided at least one day between the final date for comments and the date of adoption for considering comments from other Members. The remaining 307 notifications did not provide any interval for the consideration of comments, or the final date for comments and/or the proposed date of adoption was not available. In 38 of these notifications, the date of adoption was earlier than the final date for comments. (See Annex Table 5.)

### **Proposal**

15. Based on the analysis of the notifications in 2002, the delegation of China has submitted a proposal for amending the SPS notification procedures (G/SPS/W/131).

ANNEX
TABLE 1 - NOTIFICATIONS IN GENERAL

		TD 4 1	Rate in	Rou	ıtine	Emei	gency	Start	
	Member	Total	Total	Num.	Rate	Num.	Rate	Num.	End Num.
1	USA	225	33.43%	117	52.00%	10	4.44%	527	653
2	Canada	58	8.62%	32	55.17%	2	3.45%	124	157
3	EU	47	6.98%	27	57.45%	8	17.02%	147	181
4	New Zealand	41	6.09%	33	80.49%	3	7.32%	162	197
5	Korea	25	3.71%	14	56.00%	2	8.00%	107	122
6	Columbia	22	3.27%	11	50.00%	8	36.36%	50	68
7	Chile	22	3.27%	16	72.73%	0	0.00%	105	120
8	Brazil	20	2.97%	11	55.00%	2	10.00%	61	73
9	Mexico	19	2.82%	8	42.11%	7	36.84%	176	190
10	Salvador	17	2.53%	9	52.94%	1	5.88%	36	45
11	Philippine	16	2.38%	4	25.00%	6	37.50%	36	45
12	China	15	2.23%	4	26.67%	11	73.33%	1	15
13	Japan	15	2.23%	10	66.67%	4	26.67%	78	91
14	TPKM	14	2.08%	13	92.86%	1	7.14%	1	14
15	Australia	12	1.78%	10	83.33%	0	0.00%	135	144
16	Thailand	11	1.63%	11	100.00%	0	0.00%	82	92
17	Argentina	10	1.49%	3	30.00%	4	40.00%	64	70
18	Cuba	6	0.89%	6	100.00%	0	0.00%	1	6
19	Latvia	5	0.74%	1	20.00%	4	80.00%	42	46
20	Slovenia	6	0.89%	2	33.33%	3	50.00%	13	17
21	Peru	5	0.74%	2	40.00%	3	60.00%	39	43
22	South Africa	5	0.74%	5	100.00%	0	0.00%	10	14
23	Bolivia	4	0.59%	0	0.00%	3	75.00%	1	3
24	Costa Rica	4	0.59%	1	25.00%	3	75.00%	25	28
25	Netherlands	4	0.59%	2	50.00%	1	25.00%	56	58
26	Switzerland	4	0.59%	3	75.00%	1	25.00%	28	31
27	Uruguay	4	0.59%	0	0.00%	1	25.00%	5	5
28	Singapore	4	0.59%	1	25.00%	0	0.00%	22	22
29	Belarus	3	0.45%	3	100.00%	0	0.00%	1	3
30	HK, China	3	0.45%	1	33.33%	1	33.33%	18	19
31	India	3	0.45%	3	100.00%	0	0.00%	9	11
32	Panama	2	0.30%	2	100.00%	0	0.00%	39	40
33	Belgium	3	0.45%	2	66.67%	0	0.00%	6	7
34	Mauritius	2	0.30%	2	100.00%	0	0.00%	8	9
35	Hungary	2	0.30%	1	50.00%	1	50.00%	14	15
36	Indonesia	2	0.30%	1	50.00%	1	50.00%	17	18

	Marshar	Total	Rate in	Rou	ıtine	Emei	gency	Start	End Name
	Member	Total	Total	Num.	Rate	Num.	Rate	Num.	End Num.
37	UK	2	0.30%	0	0.00%	2	100.00%	2	3
38	Jordan	2	0.30%	0	0.00%	2	100.00%	1	2
39	Denmark	1	0.15%	1	100.00%	0	0.00%	3	3
40	Malaysia	1	0.15%	1	100.00%	0	0.00%	12	12
41	Slovak	1	0.15%	1	100.00%	0	0.00%	21	21
42	Bahrain	1	0.15%	0	0.00%	1	100.00%	4	4
43	Austria	1	0.15%	0	0.00%	0	0.00%		
44	Czech	1	0.15%	0	0.00%	0	0.00%		
45	Germany	1	0.15%	0	0.00%	0	0.00%		
46	Poland	1	0.15%	0	0.00%	0	0.00%		
47	Romania	1	0.15%	0	0.00%	0	0.00%		

TABLE 2 - NOTIFICATIONS BY OBJECTIVES

	Member	Food	Safety	Anima	l Health	Plant P	rotection		man ection	Territory Protection	
		Num.	Rate	Num.	Rate	Num.	Rate	Num.	Rate	Num.	Rate
1	USA	104	81.89%	15	11.81%	12	9.45%	4	3.15%	0	0.00%
2	New Zealand	8	22.22%	8	22.22%	22	61.11%	3	8.33%	2	5.56%
3	EU	29	82.86%	10	28.57%	9	25.71%	1	2.86%	0	0.00%
4	Canada	24	70.59%	1	2.94%	13	38.24%	2	5.88%	3	8.82%
5	Columbia	1	5.26%	15	78.95%	3	15.79%	0	0.00%	0	0.00%
6	Chile	0	0.00%	4	25.00%	12	75.00%	0	0.00%	0	0.00%
7	Korea	9	56.25%	1	6.25%	6	37.50%	1	6.25%	0	0.00%
8	China	7	46.67%	3	26.67%	3	20.00%	7	46.67%	1	6.67%
9	Mexico	2	13.33%	3	20.00%	5	33.33%	0	0.00%	6	40.00%
10	Japan	12	85.71%	3	21.43%	2	14.29%	2	14.29%	0	0.00%
11	TPKM	11	78.57%	3	21.43%	0	0.00%	1	7.14%	0	0.00%
12	Brazil	5	38.46%	4	30.77%	4	30.77%	4	30.77%	4	30.77%
13	Thailand	10	90.91%	3	27.27%	0	0.00%	0	0.00%	0	0.00%
14	Australia	7	70.00%	0	0.00%	3	30.00%	2	20.00%	2	20.00%
15	Philippine	9	90.00%	9	90.00%	1	10.00%	8	80.00%	7	70.00%
16	Salvador	3	30.00%	6	60.00%	6	60.00%	6	60.00%	6	60.00%
17	Argentina	3	42.86%	6	85.71%	3	42.86%	4	57.14%	2	28.57%
18	Cuba	0	0.00%	2	33.33%	3	50.00%	1	16.67%	2	33.33%
19	Latvia	3	60.00%	4	80.00%	1	20.00%	5	100.00%	0	0.00%
20	Peru	1	20.00%	4	80.00%	0	0.00%	0	0.00%	0	0.00%
21	Slovenia	3	60.00%	3	60.00%	2	40.00%	1	20.00%	0	0.00%
22	South Africa	5	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
23	Switzerland	2	50.00%	1	25.00%	1	25.00%	0	0.00%	0	0.00%

	Member	Food	Safety	Anima	l Health	Plant P	rotection		ıman tection		ritory ection
		Num.	Rate	Num.	Rate	Num.	Rate	Num.	Rate	Num.	Rate
24	Costa Rica	0	0.00%	1	25.00%	3	75.00%	1	25.00%	0	0.00%
25	Belarus	3	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
26	Bolivia	1	33.33%	3	100.00%	0	0.00%	1	33.33%	1	33.33%
27	India	3	100.00%	3	100.00%	0	0.00%	2	66.67%	0	0.00%
28	Netherlands	2	66.67%	2	66.67%	0	0.00%	0	0.00%	0	0.00%
29	Belgium	2	100.00%	0	0.00%	0	0.00%	1	50.00%	0	0.00%
30	UK	1	50.00%	1	50.00%	0	0.00%	0	0.00%	0	0.00%
31	HK, China	0	0.00%	2	100.00%	0	0.00%	0	0.00%	0	0.00%
32	Hungary	1	50.00%	1	50.00%	1	50.00%	0	0.00%	0	0.00%
33	Indonesia	2	100.00%	2	100.00%	0	0.00%	1	50.00%	1	50.00%
34	Jordan	2	100.00%	2	100.00%	0	0.00%	2	100.00%	0	0.00%
35	Mauritius	2	100.00%	2	100.00%	0	0.00%	0	0.00%	0	0.00%
36	Panama	2	100.00%	2	100.00%	0	0.00%	2	100.00%	0	0.00%
37	Bahrain	1	100.00%	0	0.00%	0	0.00%	1	100.00%	0	0.00%
38	Denmark	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
39	Malaysia	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
40	Singapore	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
41	Slovak	0	0.00%	0	0.00%	1	100.00%	0	0.00%	1	100.00%
42	Uruguay	1	100.00%	1	100.00%	0	0.00%	1	100.00%	1	100.00%
	Total	284	60.43%	130	27.66%	116	24.68%	64	13.62%	39	8.30%

<sup>\*</sup>This table is based on multi-selection

TABLE 3 - NOTIFICATIONS BY COMMENT PERIOD

	24	<=	0Day	1~1	15Day	16~3	30Day	31~	45Day	46~	59Day	>=	60Day	N	.A.
	Member	Num	Rate	Num	Rate	Num	Rate	Num	Rate	Num	Rate	Num	Rate	Num	Rate
1	Belgium	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	100.0%	0	0.0%
2	Denmark	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%
3	Canada	0	0.0%	0	0.0%	1	3.1%	0	0.0%	5	15.6%	23	71.9%	3	9.4%
4	EU	0	0.0%	4	14.8%	1	3.7%	1	3.7%	1	3.7%	18	66.7%	2	7.4%
5	Thailand	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	6	54.5%	5	45.5%
6	Japan	0	0.0%	0	0.0%	0	0.0%	4	40.0%	1	10.0%	4	40.0%	1	10.0%
7	New Zealand	0	0.0%	2	6.1%	3	9.1%	3	9.1%	16	48.5%	9	27.3%	0	0.0%
8	Philippine	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	25.0%	3	75.0%
9	Korea	0	0.0%	1	7.1%	2	14.3%	2	14.3%	6	42.9%	3	21.4%	0	0.0%
10	South Africa	3	60.0%	0	0.0%	1	20.0%	0	0.0%	0	0.0%	1	20.0%	0	0.0%
11	Columbia	0	0.0%	0	0.0%	1	9.1%	2	18.2%	2	18.2%	2	18.2%	4	36.4%
12	US	2	1.7%	11	9.4%	54	46.2%	6	5.1%	28	23.9%	9	7.7%	7	6.0%
13	Chile	0	0.0%	0	0.0%	9	56.3%	7	43.8%	0	0.0%	0	0.0%	0	0.0%
14	TPKM	2	15.4%	1	7.7%	2	15.4%	6	46.2%	2	15.4%	0	0.0%	0	0.0%

		<=	0Day	1~1	15Day	16~	30Day	31~4	45Day	46~:	59Day	>=(	60Day	N	.A.
	Member	Num	Rate	Num	Rate	Num	Rate	Num	Rate	Num	Rate	Num	Rate	Num	Rate
15	Brazil	2	18.2%	1	9.1%	2	18.2%	1	9.1%	1	9.1%	0	0.0%	4	36.4%
16	Australia	0	0.0%	1	10.0%	0	0.0%	3	30.0%	6	60.0%	0	0.0%	0	0.0%
17	Salvador	0	0.0%	3	33.3%	6	66.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
18	Mexico	0	0.0%	0	0.0%	6	75.0%	0	0.0%	0	0.0%	0	0.0%	2	25.0%
19	Cuba	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	6	100.0%
20	China	0	0.0%	2	50.0%	0	0.0%	1	25.0%	0	0.0%	0	0.0%	1	25.0%
21	Argentina	0	0.0%	0	0.0%	1	33.3%	0	0.0%	1	33.3%	0	0.0%	1	33.3%
22	Belarus	0	0.0%	0	0.0%	0	0.0%	0	0.0%	3	100%	0	0.0%	0	0.0%
23	Switzerland	0	0.0%	0	0.0%	0	0.0%	1	33.3%	2	66.7%	0	0.0%	0	0.0%
24	India	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	3	100.0%
25	Mauritius	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	100.0%
26	Netherlands	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	100.0%
27	Panama	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	100.0%
28	Peru	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	50.0%	0	0.0%	1	50.0%
29	Slovenia	0	0.0%	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%	0	0.0%
30	Costa Rica	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
31	HK, China	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
32	Hungary	0	0.0%	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
33	Indonesia	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
34	Latvia	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
35	Malaysia	1	100%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
36	Singapore	1	100%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
37	Slovak	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
	Total	11	2.9%	28	7.5%	89	23.8%	38	10.1%	75	20.1%	79	21.1%	54	14.4%

TABLE 4 - NOTIFICATIONS BY ADAPTING PERIOD

	Marshau	Longest	Shortest	>=6r	nonths	<6m	onths	N	.A.
	Member	(Days)	(Days)	Num.	Rate	Num.	Rate	Num.	Rate
1	Hungary	720	720	1	100.00%	0	0.00%	0	0.00%
2	EU	720	0	7	25.93%	14	51.85%	6	22.22%
3	Brazil	180	0	2	18.18%	5	45.45%	4	36.36%
4	Thailand	186	0	1	9.09%	10	90.91%	0	0.00%
5	Columbia	252	7	1	9.09%	5	45.45%	5	45.45%
6	Korea	225	0	1	7.14%	2	14.29%	11	78.57%
7	USA	180	0	1	0.85%	11	9.40%	105	89.74%
8	India	0	0	0	0.00%	3	100.00%	0	0.00%
9	Slovak	45	45	0	0.00%	1	100.00%	0	0.00%
10	Singapore	0	0	0	0.00%	1	100.00%	0	0.00%
11	Malaysia			0	0.00%	0	0.00%	1	100.00%
12	Latvia	0	0	0	0.00%	1	100.00%	0	0.00%
13	Indonesia	0	0	0	0.00%	1	100.00%	0	0.00%
14	Hong Kong	0	0	0	0.00%	1	100.00%	0	0.00%
15	Denmark	0	0	0	0.00%	1	100.00%	0	0.00%
16	Costa Rica	0	0	0	0.00%	1	100.00%	0	0.00%
17	Slovenia	30	30	0	0.00%	2	100.00%	0	0.00%
18	Peru	1	1	0	0.00%	1	50.00%	1	50.00%
19	Panama	106	0	0	0.00%	2	100.00%	0	0.00%
20	Netherlands	1	1	0	0.00%	1	50.00%	1	50.00%
21	Mauritius	0	0	0	0.00%	2	100.00%	0	0.00%
22	Belgium			0	0.00%	0	0.00%	2	100.00%
23	Swiss	120	30	0	0.00%	2	66.67%	1	33.33%
24	Belarus	60	60	0	0.00%	3	100.00%	0	0.00%
25	Argentina	0	0	0	0.00%	3	100.00%	0	0.00%
26	Philippine	0	0	0	0.00%	1	25.00%	3	75.00%
27	China	93	83	0	0.00%	3	75.00%	1	25.00%
28	South Africa	0	0	0	0.00%	5	100.00%	0	0.00%
29	Cuba			0	0.00%	0	0.00%	6	100.00%
30	Mexico	0	0	0	0.00%	2	25.00%	6	75.00%
31	Salvador	109	7	0	0.00%	9	100.00%	0	0.00%
32	Japan	0	-30	0	0.00%	3	30.00%	7	70.00%
33	Australia			0	0.00%	0	0.00%	10	100.00%
34	Taiwan	0	0	0	0.00%	2	15.38%	11	84.62%
35	Chile			0	0.00%	0	0.00%	16	100.00%
36	Canada	65	0	0	0.00%	3	9.38%	29	90.63%
37	New Zealand	90	0	0	0.00%	27	81.82%	6	18.18%
	Total			14	3.80%	128	34.22%	232	62.03%

TABLE 5 - NOTIFICATIONS BY COMMENT CONSIDERATION PERIOD

	24.	Longest	Shortest	>0	Day	=(	Day	<01	Day	N	J.A.
	Member	(Days)	(Days)	Num.	Rate	Num.	Rate	Num.	Rate	Num.	Rate
1	Belarus	26	26	3	100.00%	0	0.00%	0	0.00%	0	0.00%
2	Slovenia	30	15	2	100.00%	0	0.00%	0	0.00%	0	0.00%
3	Denmark	20	20	1	100.00%	0	0.00%	0	0.00%	0	0.00%
4	Hungary	25	25	1	100.00%	0	0.00%	0	0.00%	0	0.00%
5	Singapore	1	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%
6	Salvador	9	-109	7	77.78%	0	0.00%	2	22.22%	0	0.00%
7	EU	273	-3	20	74.07%	0	0.00%	1	3.70%	6	22.22%
8	New Zealand	180	-94	17	51.52%	0	0.00%	11	33.33%	5	15.15%
9	Peru	15	15	1	50.00%	0	0.00%	0	0.00%	1	50.00%
10	Argentina	7	0	1	33.33%	1	33.33%	0	0.00%	1	33.33%
11	Switzerland	75	-15	1	33.33%	0	0.00%	1	33.33%	1	33.33%
12	China	12	-92	1	25.00%	0	0.00%	2	50.00%	1	25.00%
13	Philippine	3	3	1	25.00%	0	0.00%	0	0.00%	3	75.00%
14	Brazil	228	-90	2	18.18%	0	0.00%	2	18.18%	7	63.64%
15	TPKM	140	1	2	15.38%	0	0.00%	0	0.00%	11	84.62%
16	Korea	17	15	2	14.29%	0	0.00%	0	0.00%	12	85.71%
17	Japan	1	1	1	10.00%	0	0.00%	0	0.00%	9	90.00%
18	Canada	15	-77	1	3.13%	0	0.00%	2	6.25%	29	90.63%
19	US	1353	-57	2	1.71%	2	1.71%	4	3.42%	109	93.16%
20	Brazil			0	0.00%	0	0.00%	0	0.00%	16	100.00%
21	Columbia	-66	-163	0	0.00%	0	0.00%	6	54.55%	5	45.45%
22	Thailand	-184	-259	0	0.00%	0	0.00%	6	54.55%	5	45.45%
23	Australia			0	0.00%	0	0.00%	0	0.00%	10	100.00%
24	Mexico			0	0.00%	0	0.00%	0	0.00%	8	100.00%
25	Cuba			0	0.00%	0	0.00%	0	0.00%	6	100.00%
26	South Africa	-90	-90	0	0.00%	0	0.00%	1	20.00%	4	80.00%
27	India			0	0.00%	0	0.00%	0	0.00%	3	100.00%
28	Belgium			0	0.00%	0	0.00%	0	0.00%	2	100.00%
29	Mauritius			0	0.00%	0	0.00%	0	0.00%	2	100.00%
30	Netherlands			0	0.00%	0	0.00%	0	0.00%	2	100.00%
31	Panama			0	0.00%	0	0.00%	0	0.00%	2	100.00%
32	Costa Rica			0	0.00%	0	0.00%	0	0.00%	1	100.00%
33	HK, China			0	0.00%	0	0.00%	0	0.00%	1	100.00%
34	Indonesia			0	0.00%	0	0.00%	0	0.00%	1	100.00%
35	Latvia			0	0.00%	0	0.00%	0	0.00%	1	100.00%
36	Malaysia			0	0.00%	0	0.00%	0	0.00%	1	100.00%
37	Slovak			0	0.00%	0	0.00%	0	0.00%	1	100.00%
	Total			67	17.91%	3	0.80%	38	10.16%	266	71.12%

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