

## **Comments from P. R. China on Notification G/SPS/N/AUS/513**

Dear Sir or Madam:

We appreciate the opportunity to submit comments from the P. R. China on the notified regulation proposed by the Food Standards Australia New Zealand (FSANZ) of Australia.

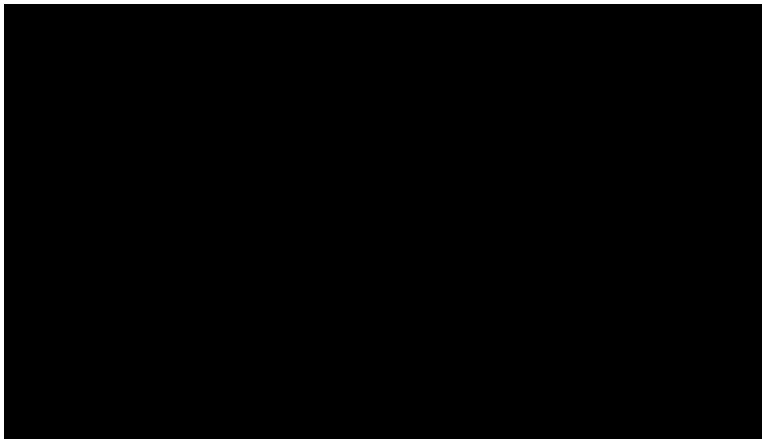
Enclosed please find comments in English and Chinese.

If there is any discrepancy between the English version and the Chinese version, the Chinese version stands.

Please acknowledge receipt of the comments by e-mail to [sps@customs.gov.cn](mailto:sps@customs.gov.cn).

Thank you very much in advance if the Food Standards Australia New Zealand (FSANZ) of Australia could take into-account the comments from the P. R. China. Your formal reply will be very much appreciated.

Best regards,



## **Comments from P. R. China on Notification G/SPS/N/AUS/513**

The Chinese government appreciates Australia for fulfilling its WTO transparency obligation and giving other WTO members the opportunity to comment on the G/SPS/N/AUS/513 Notification. After deliberation, China has put forward its comments on Australia's G/SPS/N/AUS/513 Notification, inviting Australia to consider China's comments. The details of China's comments are as follows:

Australia claimed that since pests, diseases and environmental factors differ, the use patterns of agricultural and livestock chemicals in different production areas and countries are different, so the maximum residue limits of agricultural and livestock chemicals in food are different from CODEX standards. Compared with CAC standards, in the new regulations revised by Australia, the MRLs of some chemicals in food are higher than CAC limits, but there are also cases where the limits are stricter than CAC limits, and some of them differ by more than one order of magnitude, such as the limits of acetamiprid in cottonseed and azoxystrobin in celery. It is suggested that Australia shall put forward a more reasonable scientific basis according to the harmonization principle of SPS Agreement, refer to the international general standards as much as possible, and avoid setting too strict limits without scientific basis.

The Chinese version of comments is as below:

中国政府感谢澳大利亚履行 WTO 透明度义务，给予其他 WTO 成员评议 G/SPS/N/AUS/513 号通报的机会，中方经过研究，愿就澳大利亚该通报提出如下评议意见，请澳大利亚对中方的评议意见予以考虑。

澳大利亚称因有害生物、疫病和环境因素不同，不同生产地区 and 国家的农畜化学物使用模式也不同，故制定的食品农畜化学物最大残留限量有别于 CODEX 标准。经比对 CAC 标准，澳大利亚此次修订的新规中，部分化学品在食品中的限量宽松于 CAC 限量，但也有严于 CAC 限量的情况，严于 CAC 限量的幅度较大，有的相差一个数量级以上，如啉虫脒在棉籽中的限量、米啉菌酯在芹菜中的限量。建议对此类限量标准，澳方应按照 SPS 协调一致原则，提出更加合理的科学依据，尽可能参照国际通用标准，避免制定过于严格而缺乏科学依据的限量要求。

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