

SECOND TBT QUARTERLY REPORT

2017



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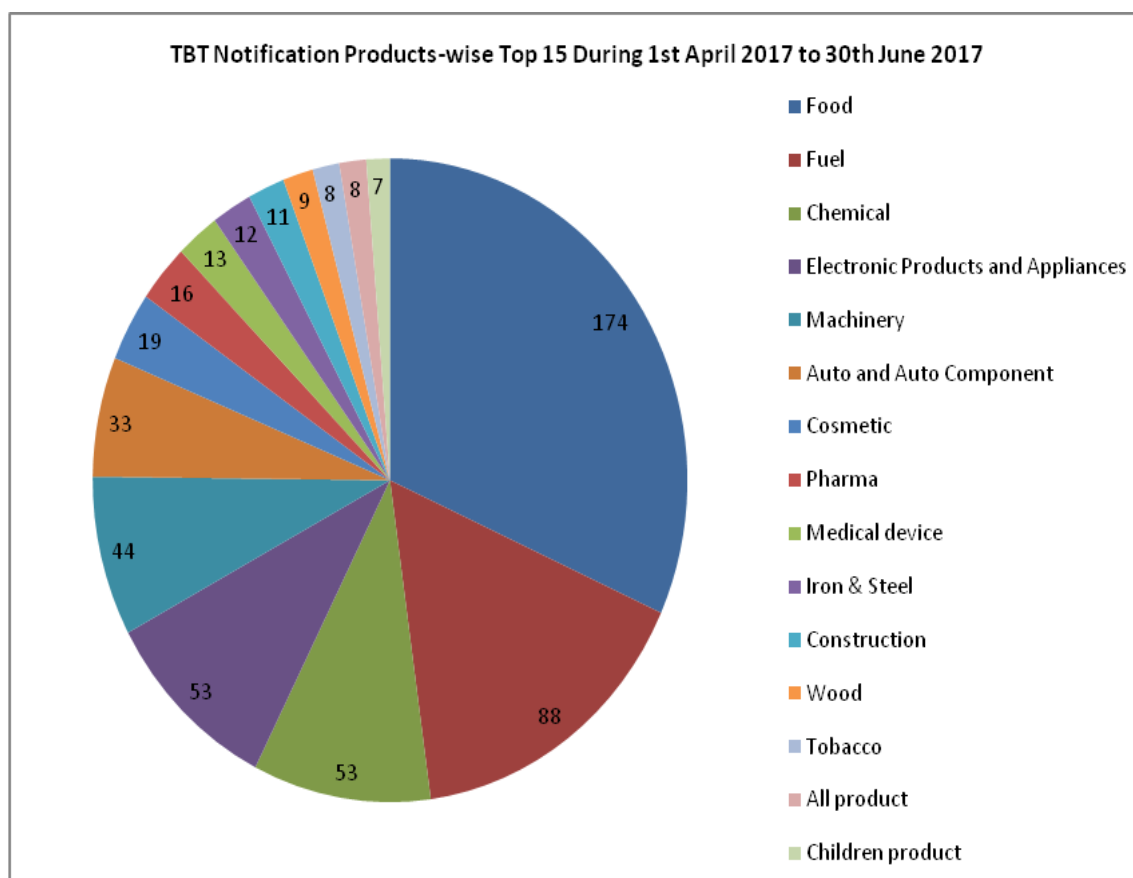
TBT QUARTERLY REPORT (1ST OF APRIL '17 TO 30TH JUNE '17): AT A GLANCE

Details Pertaining to TBT Notifications Issued By All WTO Member Countries

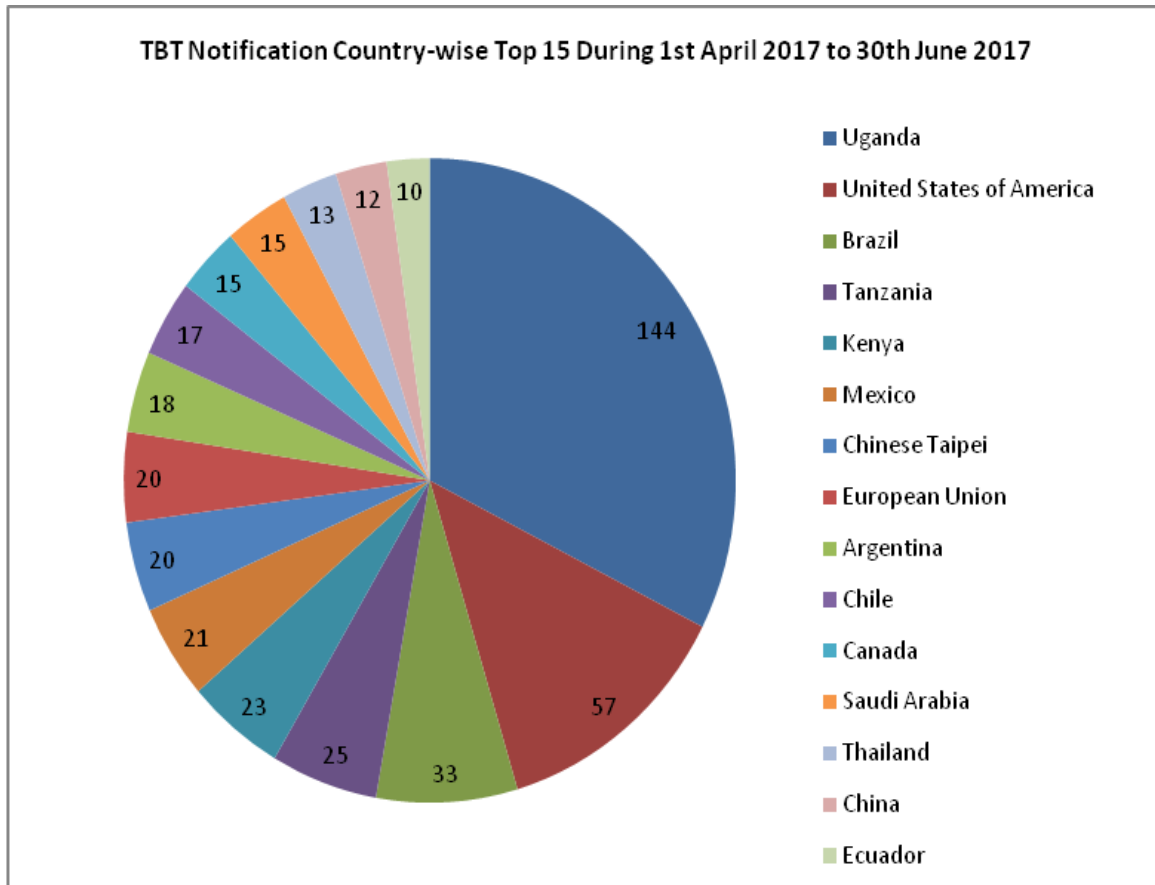
The total number of TBT notifications issued by the various WTO-member countries from 1st of April 2017 to 30th June 2017 was 624. Out of these 624 notifications, India issued three TBT notifications. Hence, a total of 621 notifications were studied in the quarter 1st April 2017 to 30th June 2017 which was relevant to India. Out of 621 notifications, 217 notifications were the addendum of draft regulations notified earlier in the WTO.

Details Pertaining to TBT Notifications Relevant To India

Product-wise Information: Out of the total 621 TBT notifications which were relevant to India, 174 related to food products, 88 related to fuel, 53 chemical products, 53 electronic products and appliances, 44 machinery, 33 auto and auto components, 19 related to cosmetic, 16 related to pharmaceutical products, 13 related to medical device, 12 related to iron and steel, 11 related to construction, 9 related to wood products, 8 related to tobacco products, 8 related to all products, 7 related to children products and the remaining 73 related to other products.



Country-wise Information: Out of the total 621 TBT notifications relevant to India, Uganda issued 144 notifications, followed by USA, Brazil, Tanzania, Kenya, Mexico, Chinese Taipei, European Union, Argentina, Chile, Canada, Saudi Arabia, Thailand, China, Ecuador with 57, 33, 25, 23, 21, 20, 20, 18, 17, 15, 15, 13, 12 and 10 notifications, respectively. These countries are among the top 15 TBT notification issuing countries. The remaining 178 notifications were from other WTO Member countries.



Details Pertaining to Draft Responses Sent

Notifications-May Impact Indian Industry: (Draft Responses Sent)

Responses have been sent on 20 TBT notifications in the quarter April 2017 to June 2017. In these notifications stakeholders were of the view that, though some of the notifications were in line with International Standards, they may adversely impact Indian exports. Hence, APJ-SLG suggested that the Government of India may seek clarifications from the concerned enquiry point requesting them to provide justification for setting the proposed regulations. These notifications are mentioned below:

Sl. No.	Notification Number	Members	Products	Status
1	G/TBT/N/ARE/356, G/TBT/N/BHR/470, G/TBT/N/KWT/352, G/TBT/N/OMN/294, G/TBT/N/QAT/468, G/TBT/N/SAU/972, and G/TBT/N/YEM/72	United Arab Emirates, Kingdom of Bahrain, the State of Kuwait, Oman, Qatar, Kingdom of Saudi Arabia and Yemen	Pesticides and other agrochemicals	The Saudi Standards, Metrology and Quality Organization (SASO) have issued this notification concerning the draft technical regulation for 'Maximum limits of pesticides residues in agricultural and food products'. In most of the cases, ASL observed that the proposed residue limits in or on multiple products are in accordance with the Codex limits. In reply, India requested the notifying agency for standardising the pesticide residue limits as per the international standard- Codex Alimentarius Commission.
2	G/TBT/N/AUS/100/Add. 2	Australia	Labelling of food products	The Department of Industry, Innovation and Science has issued this notification announcing the enactment of the Competition and Consumer Amendment (Country of Origin) Act 2017. The labelling requirements are applicable to products that are required to bear a label as per the Food Standards Code. This standard has been issued under the Australian Consumer Law. This standard contains information on mandatory application of country of origin labelling requirements for

Sl. No.	Notification Number	Members	Products	Status
				<p>food. The labelling requirements are determined by the food whether it is,</p> <ol style="list-style-type: none"> 1. Grown, produced or made in Australia 2. Packaged in Australia 3. Grown, produced or made in another country 4. Packaged in another country. <p>In case of imported food products, the country of origin would be the exporting country. However, in presence of Australian ingredients, their levels by weight and chart may be provided in the label. This requirement of information on Australian ingredients has been kept under the 'voluntary' option. The standard states that the labelling requirements vary depending on the categories of food as follows:</p> <ol style="list-style-type: none"> 1. Packaged food, other than fresh fruit and vegetables in transparent packages 2. Fresh fruit and vegetables in transparent packaging 3. Unpackaged meat, fish, fruit and vegetables <p>Further, if the food product falls under the priority list, then the country of information shall be displayed in a clearly defined box. It provides a transitional time of two years for complying with the standard. It contains information on logo and appropriate bar chart.</p> <p>Imported food products:</p> <ol style="list-style-type: none"> 1. Statement of country of origin in the packaged food product 2. In case of ingredients from more than one country, then the name of the country in which the final packaging was undertaken. It must indicate that the food product is made from ingredients imported from other countries. <p><u>In reply, India stated that:</u> The products which are made in other countries are required to carry the information stating the percentage of Australian ingredients (if used) along with the information on the source</p>

Sl. No.	Notification Number	Members	Products	Status
				<p>of other ingredients. In this regard, India sought the rationale for mentioning the percentage of ingredients if sourced from Australia and the sources of other ingredients.</p> <p>Further, the ingredients undergo transformation during the production process and the final product bears the name of the country where the last production had taken place. This is covered under the Rules of Origin (RoO) criteria that forms part of all trade agreements. Thus, the last stage becomes the identity of the product, if the RoO criteria are fulfilled. However, India is of the view that the requirement of details as mentioned above like the percentage of Australian ingredients and source for other ingredients has the possibility of reducing the country of origin where in the last production had taken place to a minimalistic position. Thus, the status of 'Made in' country may become secondary. In addition, India is of the view that it would increase the financial burden on the exporters and it may lead to trade restrictions in future. Hence, India requested the Australian authorities to provide the rationale for the changes in the country of origin labelling.</p>
3	G/TBT/N/DMA/15	Dominica	Trucks and bus Tyres and rims	<p>This standard refers to designation, dimensions and load ratings of the metric series of tyres primarily intended for trucks and buses. It is applicable to bias-belted, diagonal and radial tyres for trucks and buses, mounted on 5° tapered rims.</p> <p>In reply, India stated tyres are regulated as per the Bureau of Indian Standards (BIS) Act in India. Tyres are regulated as per the Mandatory and Voluntary standards issued by BIS. BIS has prescribed four mandatory standards (IS-13098, IS-15627, IS-15633 and IS-15636) for tyres and tubes used in motor vehicles, cars and commercial vehicles. BIS has eight recognized testing laboratories for testing of tyres in India.</p> <p>Hence, India requested Dominica to provide equivalence and allow exports, which confirm to BIS standards.</p>

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4	G/TBT/N/ECU/333	Ecuador	Food products	<p>The National Agency of Regulation, Control and Sanitary Surveillance (ARCSA) has issued this notification proposing the technical regulation concerning processed food products, food production establishments, processing, distribution, marketing, transportation.</p> <p>This regulation establishes the sanitary requirements for the operations including manufacturing, processing, preparation, packaging, transport, storage and marketing of foodstuffs. It is applicable on all processed food products.</p> <p>Food products must be produced in accordance with GMP and the FBOs must possess the certificate for GMP. In case of packaging, the FBOs must pay attention to the material as there should not be any migration of ink from the material to the food products. Processed food products must meet the respective specifications. Any changes must be communicated to the authorities. In absence of Ecuadorian standard, international standard may be followed. The agency has listed the products that are exempted from the purview of this regulation and those are primary –unprocessed products, raw, chilled or frozen meat, eggs, honey, dried beans, seeds, nuts in shell.</p> <p>In case of imports, the certified foreign manufacturers or owners of the product are required to register. And any certification issued by the competent authority of the exporting countries must be authenticated by the Consul of Ecuador in the exporting country. Further, any technical documents of the product must be in Ecuador’s official language – Castilian or in English.</p> <p><u>In reply</u>, India requested the ARSCA authorities to provide clarification on the scope of the proposed regulation on whether the proposed regulation is applicable on all food products or only the dairy products as mentioned in the notification. Further, India stated that the certificates like</p>

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				<p>health certificate, export certificate or any other equivalent certificate issued by the competent authority of the exporting country to be authenticated by the Consul of Ecuador located in the exporting country. The foreign manufacturers require authentication from the Consul of Ecuador in the exporting country. In this regard, India sought the rationale for requiring the Consul of Ecuador's authentication on the certificates issued by the exporting country and also when the foreign manufacturer is approved via registration process in Ecuador.</p>
5	G/TBT/N/EU/469	European Union	Pesticide active substance – Beta-cypermethrin	<p>The European Commission has issued this TBT notification proposing the implementing regulation on the non-approval of active substance – beta cypermethrin. The agency has withdrawn the approval and hence, cannot be placed in the market. Following this decision, separate action on MRLs is likely to be notified via SPS notification.</p> <p>It is registered for use in India- Cypermethrin (sum of isomers) on wheat at 0.05 ppm, milled wheat grains- 0.01 ppm, brinjal – 0.20 ppm, cabbage – 2 ppm, bhindi-0.20 ppm, oil seeds except groundnut – 0.20 ppm, meat and poultry -0.20 ppm, milk and milk products- 0.01 ppm.</p> <p><u>In reply India stated that:</u></p> <p>The proposal of non-approval is based on the European Food Safety Authority (EFSA) evaluation on pesticide's risk assessment. However, we would like to mention that this pesticide is registered for use in India on multiple products. In addition, we find that it is used in other countries like Brazil, Canada, Australia and others. Hence, the non-approval of this pesticide may pose trade restriction on agricultural and food products.</p> <p>India observes that the EFSA, in its report, identified that the substance poses high risk to aquatic organisms, bees and non-target arthropods. We also find that the 'insufficient information' identified by the EFSA during the assessment has</p>

Sl. No.	Notification Number	Members	Products	Status
				formed the basis of such proposal of non-approval measure. In this regard, India would like to request the EU authorities to consider the available technical information in formulating its decisions concerning the status of this substance.
6	G/TBT/N/KEN/551	Kenya	Specifications for steel products	<p>The Kenya Bureau of Standards has issued these notifications concerning draft standards and specifications for the following:</p> <ul style="list-style-type: none"> a) Cold rolled steel b) Hot-rolled structural steel c) Hard-drawn steel wire fabric d) Weld mesh e) Ribbed weldable reinforcing steel <p><u>In reply, India stated that:</u></p> <p>In India, steel and steel products in India are regulated as per Steel and Steel Products (Quality Control) order, 2012. BIS mandates different 20 categories of steel and steel products under Mandatory Certification scheme. BIS has already signed MoUs with African standardizing agencies like Ghana Standards Bureau (GSB), Standards Organization of Nigeria (SON) and Mauritius Standards Bureau (MSB). Hence, India requested the Kenyan authorities to provide equivalence to BIS and allow exports which confirm to Indian standards.</p>
7	G/TBT/N/KEN/552	Kenya	Specifications for steel products	
8	G/TBT/N/KEN/553	Kenya	Specifications for steel products	
9	G/TBT/N/KEN/554	Kenya	Specifications for steel products	
10	G/TBT/N/KEN/555	Kenya	Specifications for steel products	
11	G/TBT/N/UGA/613	Uganda	Egg powder	<p>The Uganda National Bureau of Standards has issued this notification concerning the specifications for egg powder. The draft standard specifies the requirements, method of sampling and test for egg powder obtained from poultry eggs. This includes all egg powder processed from edible birds' eggs domesticated for human consumption.</p> <p>The draft standard contains the types of egg powder along with specific requirements for processing, and finished</p>

Sl. No.	Notification Number	Members	Products	Status
				<p>products. The egg products must not contain any antibiotic residues and must sourced from producers.</p> <p><u>In reply, India stated that:</u> The Uganda National Bureau of Standards has proposed this specification for egg powder. In this regard, India submitted in Point 5.2.3 – Requirements of the finished product, India finds the chemical requirements for egg powder in terms of Total ash, % by mass Max, has been fixed at 3.6 %. In our understanding, the total ash is fixed at 4%. Hence, we would like to know the scientific rationale for fixing such a stricter percentage of total ash as chemical requirement.</p>
12	G/TBT/N/CHN/1199	China	Food Products	<p>The China Food and Drug Administration have issued this notification on food products in general. It is titled as 'Provisions for Investigating and Punishing Food Safety Fraud'. Provisions for Investigating and Punishing Food Safety Fraud have been formulated according to the Food Safety Law of the People's Republic of China in order to investigate and punish food safety fraud, to ensure food safety, and to protect public health and life. This notified provision is mainly to clear the connotation of food safety fraud, and list 10 kinds of specific food safety fraud behaviours such as product fraud, food production or marketing behaviour fraud, labelling fraud, food information dissemination fraud, information fraud, food inspection and certification fraud, permit application fraud, record information fraud, report information fraud and submission of false supervision information. Moreover, these provisions also clarify specific legal responsibility of the related fraud.</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> Any deliberate activity undertaken during food production, storage, transportation, distribution or other activities in the food supply chain with an intention to

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				<p>provide false information or leading to a food safety incident would be treated as a 'food fraud'. In this scope of food fraud, India understands that the notifying agency intends to prevent intentional economic gains and ensure safe food for human consumption. Further, we noted the classification of food safety fraud. However, we find no details on the mechanism to handle food safety incidents due to unintentional activity in the food supply chain. We would like to know whether such incidents by mistake would also be treated as 'food fraud'. India is of the view that establishing certain criteria for clear identification would enable the establishment of the incident as food safety fraud beyond any reasonable doubt. Further, it would also enable the competent authority to identify the concerned stakeholders in the food supply chain as the responsible for the food safety incident.</p> <ul style="list-style-type: none"> • In addition, under Article 8 – Food Production and Business Conduct Fraud, manufacture and sale of counterfeit food technology has been listed as fraud. In this regard, India would like to know the criteria which the competent authority may use to identify such counterfeit technology. In our view, technologies change rapidly due to the innovation system prevailing or fostering in a country which gets ingrained in the production system. In this context, we would request the notifying agency to define the counterfeit food technology. India would like to mention that such details are requested from the China Food and Drug Administration so that we may have clarity on the notified document. • In addition, India finds that the classification of food safety fraud to be encompassing all the actors in the supply chain. For instance, we find that the Article 11 – information fraud concerning the use of media for marketing the product. In our view, importers take the

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				<p>initiative rather than the food manufacturers who are located in the other countries. In case of information fraud, the liability may be solely on the importers. In such cases, we would like to know whether the food manufacturers would also be held responsible. Hence, we are of the view that identification and listing of fraudulent practices for manufacturers, importers, distributors, exporters and other concerned would be beneficial for the concerned stakeholders to understand and to comply with the requirements of the food safety system in China.</p>
13	/TBT/N/UGA/538/Rev.1	Uganda	Use of distinctive mark on commodities	<p>This draft Ugandan standard contains the following:</p> <ul style="list-style-type: none"> • Marking or applying a distinctive mark on a commodity • Prohibition regarding manufacture, import, storage, sale and distribution of any commodity covered by a compulsory standard specification unless the commodity conforms to the specified relevant standards or bears the distinctive mark • Registration and authorization to use the distinctive mark • An importer or manufacturer of any commodity for which a compulsory standard specification has been declared shall ensure that the commodity bears a distinctive mark specified in schedule 1 of the draft regulation • A commodity covered by compulsory standard specifications shall only be placed on the market for sale when it bears the distinctive mark • UNBS will grant the permit to use the distinctive mark on a commodity for which a compulsory standard specification has been declared to a manufacturer or importer after all the requirements of this regulation have been met • No person shall manufacture or store for sale, import, sell or distribute any commodity covered by a compulsory standard specification unless:- a) the commodity conforms to

Sl. No.	Notification Number	Members	Products	Status
				<p>the specified relevant standards; and b) the commodity bears the distinctive mark specified in schedule 1 of the draft regulation</p> <ul style="list-style-type: none"> • An importer or manufacturer who intends to bring into the country or manufacture a commodity covered by a compulsory standard specification in Uganda shall apply to the bureau to be registered and authorized to use the distinctive mark • For each consignment, the importer shall apply to UNBS for use of this mark • Upon sampling, the UNBS will affix distinctive mark for every successful consignment <p><u>In reply, India stated that:</u></p> <p>A. Point 5.1 of the draft states that, “An importer or manufacturer who intends to bring into Uganda or manufacture a commodity for which a compulsory standard specification is declared under section 18 of the Act shall apply to the Bureau to be registered and authorized to use the distinctive mark.”</p> <p>Point 7.1 of the draft states that, “An importer of a commodity specified in schedule 2 shall apply to the Bureau for registration and authorization to use the distinctive mark before importing the commodity into Uganda.”</p> <p>As per our understanding, both the manufacturer and the importer have to apply for the registration and authorization to use the distinctive mark. India would like to request the Ugandan authorities to provide clarity on whether both the importer and the manufacturer have to apply for registration.</p> <p>Further, point 7.3 of the draft states that, “An application shall be made in respect of each consignment”. Point 7.4 of the draft states that, “The Bureau through its appointed agents shall carry out conformity assessment of all commodities before importation.” It means the manufacturer and importers have</p>

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				<p>to undergo the assessment process for each consignment. India would like to state that, the requirement of application and assessment of every consignment may result in considerable administrative burden for both the Uganda National Bureau of Standards (UNBS), for importers and for the foreign manufacturers and may also add financial burden for manufacturers and importers.</p> <p>Further, the draft states that UNBS will provide distinctive marks for each consignment rather providing importer-wise distinctive marks. India would like to request the Ugandan authorities to provide the rationale for imposing such requirements. India would like to suggest the Ugandan authorities to consider granting importers permission to use the distinctive mark for a specified longer period for unlimited consignments.</p> <p>B. Point 10 of the draft explains the terms of use of distinctive mark and product recall process for foreign manufacturers and importers. However, the product recall criterion is not mentioned for domestic manufacturers. In this context India would like state that this clause is against the principle of national treatment prescribed in Part II, Article III of the General Agreement on Tariffs and Trade (GATT 1947). Hence, we would like to request the Ugandan authorities to clarify whether the product recall criteria is also applicable for domestic manufacturers.</p> <p>C. The Ugandan authorities have prescribed the above mentioned import requirements applicable to products which have already been subject to conformity assessment procedures prescribed by relevant international standards in their respective countries. India finds that the Ugandan authorities have not considered allowing conformity assessment by any International Laboratory Accreditation Cooperation (ILAC) accredited lab. In this context, India would like to request the Ugandan authorities to consider a</p>

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				<p>mechanism that ensures the process for compliance may benefit exports from India and help build a healthy supply chain.</p> <p>D. In addition, the India considers that a description of the product categories, covered by the notified draft, would need further clarification, in particular as to whether certain products are covered or not, for instance, whether information technology and communication products are included in the electrical and electronic segment.</p>
14	G/TBT/N/ARG/320	Argentina	Milk Powder	<p>The Sub-Working Group no.3 "Technical Regulations and Conformity Assessment"- MERCOSUR has issued this notification on Draft Common Market Group Resolution: "MERCOSUR Technical regulation on Identity and Quality Milk Powder (Repealing Resolution no.82/93 GMC ones and 138/96)".</p> <p>This technical regulation contains details on the definition of the product, classification, raw materials, requirements like sensory and physio chemical, food additives. It mandates that the establishment and processing practices as per MERCOSUR resolution on hygiene practices.</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> • In the proposed technical regulation, India finds that the definition of the product includes only the cow's milk. In addition, we also find that only cow's milk has been listed as a raw material under the sub-section - 4: Composition and Requirements. However, India would like to mention that milk powder is obtained from cow's and/or buffalo's milk. Hence, we find that inclusion of only cow as a source for milk to produce milk powder to be restrictive in nature. In this regard, India would like to know the rationale for listing only milk obtained from cow as a raw material for the production of milk powder. • India requested the attention of Argentina authorities to

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				<p>the international standard- CODEX STAN 207-1999 titled as “Standard for Milk Powders and Cream Powder”. In this standard, the Codex has not specified the source of milk as cow, buffalo or any other animal. Given this context, India is of the view that exclusion of other sources of milk other than cows would pose a barrier to trade on milk powder. Hence, we would like to request the Argentinean authorities to include other sources of milk in addition to cow in the raw materials section.</p>
15	G/TBT/N/BRA/721	Brazil	Medicinal products	<p>This Draft Resolution provides for good distribution and storage practices as well as good practices for the transport of medicinal products. It applies to companies that carry out the activities of distribution, storage or transport of medicines. This resolution does not apply to the distribution storage and transportation activities of raw materials, bulk drugs, labels, packaging or medicinal gases.</p> <p>The proposed resolution is applicable on storage during transit of cargo as well along with the imports. It mandates the requirement of Standard Operating Procedure (SOPs) concerning movement of drugs. The Good Distribution and Storage Practices (BPDA) must be established and followed from manufacturer, distributor to patient (supply chain) and also in reverse logistics i.e. collected from the market.</p> <p>Manufacturers must provide drugs only to licensed companies by ANVISA. Distributors are required to collect consignments only from the registered companies and shall give to authorized companies holding a valid license.</p> <p>In reply, India stated that:</p> <ul style="list-style-type: none"> • The draft resolution mandates the manufacturers and distributors to provide medicinal products only to those companies that are authorized and licensed by the health authority of Brazil. In this context, India would like to know whether the ANVISA would publish the list of authorized and licensed companies which have the permit

Sl. No.	Notification Number	Members	Products	Status
				<p>to engage in distribution of medicinal products in its territory. Further, we would like to mention that there are no details on the impact on manufacturers or exporters in case of any discrepancies found in the consignments at the point of entry. India understands that as per Article 59 of the draft resolution, in case of any deviations observed during the transportation of medicinal products by the carriers or transporters would be informed to the manufacturers.</p> <ul style="list-style-type: none"> • However, India would like to know whether such deviations resulting from the transportation process would have any effect on the authorization for placing a product in the Brazilian territory. In other words, India would like to know whether the manufacturers or exporters of the exporting country would be held responsible for any deviations during the transportation process although a clear and precise instruction on storage and transportation would have been provided to the transporters or carriers.
16	G/TBT/N/CHL/404	Chile	Electrical and fuel products	<p>The Superintendent of Electricity and Fuel (SEC) has established this certification system for electrical products and fuel. The draft refers to the following:</p> <p>a) The applicant for the certification shall submit an application to the SEF with relevant details on product identification, documented quality control system, material testing details and inspection details. The certification system is divided into three phases, a) type test, b) initial audit, and c) capacity evaluation.</p> <p>b) As a requirement to enter into the system, the applicant must have at least one year of experience in product certification.</p> <p>c) After filing the application, the SEF will verify the documents and proceed for type testing by an authorized and recognized testing lab.</p>

Sl. No.	Notification Number	Members	Products	Status
				<p>d) After type test, a certification agency will evaluate the report and issue a type certificate and proceed for initial audit. If a product has already received a type test report from any recognized body, then it may directly go for initial audit. It must be undertaken as per ISO-90111:2000 norms.</p> <p>e) After receiving the type test report and initial audit report, the first production is carried out, in order to evaluate the capacity. The evaluation process involves sampling. The recognized testing labs will carry out test and analyze the production type.</p> <p>f) Depending on the tests and verification, the SEF will issue a production control certificate. The draft states that, trade audit, production audit and quality audit need to be performed in every three months. These audits can be performed by a certification body, recognized by an accreditation agency signatory to International Accreditation Forum (IAF).</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> • As per the draft, the certification system requires that the applicant must have at least one year of experience in product certification. We would like to request the Chilean authorities to provide the rationale for listing the requirement of one year experience. • As part of the certification system, SEF requires type testing by authorized and recognized testing labs. However, the draft also states that, after initial audit, testing labs will again carry out another test to analyze the production type. In every three months the certification body will undertake trade audit, production audit and quality audit. We would like to state that multiple audit and testing requirements would be burdensome for the applicant and would get added to the product cost. In this context, we would like to request the Chilean authorities

Sl. No.	Notification Number	Members	Products	Status
				<p>to reconsider the requirement of multiple audits and testing by certification bodies.</p> <ul style="list-style-type: none"> Further, the draft also states that, audit can be performed by a certification body, recognized by an accreditation body signatory to International Accreditation Forum (IAF). In this regard, we would like state that, India has the National Accreditation Board for Certification Bodies (NABCB), which provides accreditation to certification and Inspection Bodies based on an assessment of their competence as per the criteria and in accordance with International Standards and Guidelines. NABCB is member of International Accreditation Forum (IAF), Pacific Accreditation Cooperation (PAC), International Laboratory Accreditation Cooperation (ILAC) & Asia Pacific Laboratory Accreditation Cooperation (APLAC). Apart from this, NABCB is also a signatory to Quality Management Systems (QMS), Environmental Management Systems (EMS) and Product Certification. Hence, we would like to request Chilean authorities to provide accreditation to NABCB, which will facilitate exports from India. In this regard, India would like to seek bilateral consultation with Chile as to avoid any disruptions in trade.
17	G/TBT/N/CHN/1201	China	Formaldehyde emission of wooden products	<p>The Standardization Administration of China (SAC) has established this standard, which specifies the formaldehyde emission limit of wood-based panels and finishing products for indoor decorating and refurbishing as well as test methods, decision rules and the inspection report requirements thereof. The standard applies to the formaldehyde emission amount of wood-based panels and finishing products, such as fibreboard, particleboard, plywood, blockboard, reconstituted decorative lumber, laminated veneer lumber, glued-laminated timber, surface decorated wood-based panel, wood-based floor, wood-based panel, wood-based door, and wood-based window. The draft is in line with ISO 16893:2016 on tests and thickness</p>

Sl. No.	Notification Number	Members	Products	Status
				<p>specification of particle boards and ISO 12460-1:2007 on method of emission of formaldehyde from wood based panels.</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> • In India, Bureau of Indian Standards (BIS) has prescribed standards IS: 3321, which lays down the requirements and the methods of sampling and test for formaldehyde solution and also meets the requirements for processing of photosensitized materials. This standard was first published in 1965; however, the BIS Sectional Committee had revised the standard and aligned the methods of test with ISO Recommendations. In this revised standard, the requirements and methods of test for heavy metals and pH value have been included and a chemical method for the determination of methanol content in addition to the graphical method has been added. In this context, India would like to request the Chinese authorities to provide equivalence to BIS norms as they are already in line with ISO standards. • Further, in India the National Accreditation Board for Certification Bodies (NABCB), provides accreditation to certification and Inspection Bodies based on an assessment of their competence as per the criteria and in accordance with International Standards and Guidelines. NABCB is member of International Accreditation Forum (IAF), Pacific Accreditation Cooperation (PAC), International Laboratory Accreditation Cooperation (ILAC) & Asia Pacific Laboratory Accreditation Cooperation (APLAC). Apart from this, NABCB is also a signatory to Quality Management Systems (QMS), Environmental Management Systems (EMS) and Product Certification. Hence, we would like to request Chinese authorities to provide accreditation to NABCB to certify

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				<p>testing facilitates who will perform the tests according to the prescribed ISO norms. This will facilitate exports from India. In this regard, India would like to seek bilateral consultation with China as to avoid any disruptions in trade.</p>
18	G/TBT/N/JAM/57	Jamaica	Pneumatic tyres for uses in passenger cars	<p>These notifications specify:</p> <ul style="list-style-type: none"> • Tyre dimensions and laboratory test requirements for bead unseating resistance, strength, endurance, and high-speed performance; defines tyre load ratings and other relevant terms; and specifies labelling requirements for passenger car tyres.
19	G/TBT/N/JAM/58	Jamaica	Pneumatic tyres for uses in passenger cars	<ul style="list-style-type: none"> • Performance and marking requirements for tyres for use on multipurpose passenger vehicles, trucks, buses, trailers, and motorcycles <p>The purpose of these standards is to provide safe operational performance levels for tyres used on motor vehicles other than passenger cars, and to place sufficient information on the tyres to permit their proper selection and use. These standards apply to pneumatic tyres designed for road use on multipurpose passenger vehicles, trucks, buses, trailers, and motorcycles.</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> • In India, tyres are regulated as per the Bureau of Indian Standards (BIS) Act. These products are regulated as per the Mandatory and Voluntary standards issued by BIS. It has prescribed four mandatory standards (IS-13098, IS-15627, IS-15633 and IS-15636) for tyres and tubes used in motor vehicles, cars and commercial vehicles. BIS has also established five testing laboratories for testing of tyres in India. • We would like to state that India also follows similar regulatory requirements for tyres. Further, BIS is a founder member of International Organization for

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				<p>Standardization (ISO). BIS has signed Memorandum of Understandings (MoUs) in the fields of standardization and conformity assessment with 21 countries.</p> <ul style="list-style-type: none"> Hence, we would like to request Jamaica to accept standards prescribed by BIS. Hence, we request the Jamaican authorities to provide equivalence and allow exports, which confirm to BIS standards. In this regard, India would like to seek bilateral consultation with Jamaica on this issue.
20	G/TBT/N/MEX/300/Add. 8	Mexico	Petroleum products-automotive diesel	<p>The Mexican Energy Regulatory Commission has issued this notification concerning specifications for automotive diesel. As per the amendment, Mexico will only allow imports of automotive diesel with a minimum cetane limit 40. The notification is aimed to ensure an adequate and efficient supply of fuel on the agreed terms and thus avoid a possible diesel shortage in Mexico with serious consequences for users.</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> In India, the Bureau of Indian Standards (BIS) standard "IS: 1460-Automotive Diesel Fuel" prescribes the requirements, sampling procedures and test methods for automotive diesel fuel. It is applicable to automotive diesel fuel for use in diesel engine vehicles designed to run on automotive diesel fuel. As per Second Amendment, IS: 1460 in March 2010 BIS has allowed the minimum cetane number and the index at 51 and 46, respectively. It shows that, India is already meeting the minimum cetane criteria prescribed by the Mexican authorities. Hence, we would like to request the Mexican authorities to allow Indian standards so that it will facilitate diesel exports from India.

Sl. No.	Notification Number	Members	Products	Status
21	G/TBT/N/ARG/297/Add. 8	Argentina	Low voltage electrical equipments	<p>The notification amends the regime governing the mandatory certification of compliance with the essential safety requirements for low-voltage electrical products marketed in Argentina. As per the notification, the purpose of this regulation is to:</p> <ul style="list-style-type: none"> reformulate certain requirements so as to rationalize the implementation of the regime and adapt it to market changes; amend the universe of products which, when used professionally or by electrical safety experts, may be subject to alternative means of compliance with the safety requirements; establish criteria for forming families of products, with a view to the issuing of a certificate for each of these families; establish a single certificate format for each of the authorized modalities; establish new guidelines for the monitoring of certified products by certification bodies.
22	G/TBT/N/ARG/297/Add. 9	Argentina	Low voltage electrical equipments	<p>In reply, India sought clarification from the Argentinean authorities on the following: The regulation also states that, a company by itself or through an authorized representative must submit an affidavit in a form specifying the registration number from the unique registry of the Ministry of Production of Argentina. However, the procedure for obtaining the registration number is not provided in the regulation. In this regard, India would like to request the Argentinean authorities to provide the procedural details for obtaining the registration number from the Ministry of Production, Argentina.</p>
23	G/TBT/N/ARG/297/Add. 10	Argentina	Low voltage electrical equipments	<p>the Argentinean National Institute of Viticulture (INV) has proposed the following:</p> <ol style="list-style-type: none"> The regime establishes that the fractionators and / or traders of methanol will only be able to sell methyl alcohol in
24	G/TBT/N/ARG/322	Argentina	Control regime of methyl alcohol or methanol	

Sl. No.	Notification Number	Members	Products	Status
				<p>bulk or divided in packs higher than 1000 cc, when the buyer is registered before INV.</p> <p>2. Fractionators may only sell bulk or fractionated methanol,</p> <p>a) in containers greater than 1000 Cubic Centimeters (1,000 cm³) when the buyer is registered with the INV.</p> <p>b) in containers of up to 1000 Cubic Centimeters (1,000 cm³) When the buyer uses it for pro-quality analysis.</p> <p>3. Those establishments that import this product into containers of up to 4000 Cubic Centimeters (4000 cm³), may market it in their original packaging to non-registered persons provided that the purchaser uses it solely and exclusively for calibration of chemical instruments and / or for analysis.</p> <p>4. Circulation of the product must be covered by an invoice or a commercial return, in which the following mandatory data will be indicated:</p> <p>a) Type of alcohol</p> <p>b) Volume or weight</p> <p>c) Capacity and type of packaging</p> <p>d) Analysis of free circulation type granted by the National Institute of Viniculture</p> <p>e) Purity percentage by weight, and</p> <p>f) Recipient</p> <p><u>In reply, India stated that:</u></p> <p>As per the draft, the sale of methanol to non-registered importers in Argentina under the established conditions will be communicated through the system of "Online Affidavits". However, the procedure for submitting the affidavits is not provided in the regulation. In this regard, India would like to request the Argentinean authorities to provide the procedural details for submitting the affidavits and also the details of the agency in Argentina who handles and regulates this system.</p>

Sl. No.	Notification Number	Members	Products	Status
25	G/TBT/N/BLZ/6	Belize	Standards for diesel	The Belize Bureau of Standards has issued these notifications concerning draft Belize standards and specifications for diesel fuel (high, low sulphur and ultra-low sulphur) and unleaded gasoline for motor vehicles.
26	G/TBT/N/BLZ/7	Belize	Standards for gasoline	<p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> • In India, the Bureau of Indian Standards (BIS) standard “IS: 1460-Automotive Diesel Fuel” prescribes the requirements, sampling procedures and test methods for automotive diesel fuel. It is applicable to automotive diesel fuel for use in diesel engine vehicles designed to run on automotive diesel fuel. • Further, BIS has issued “IS 2796:2008 Motor Gasoline Specifications” standards for motor gasoline for the vehicles meeting Bharat Stage IV/Euro IV Vehicular Emission Norms based on the Auto Fuel Policy, issued by the Ministry of Petroleum and Natural Gas, Government of India. It also prescribes the requirements, methods of sampling and tests for gasoline for use as fuel in the automobile spark ignition internal combustion engines of vehicles. • Analysis shows that, Indian standards are meeting all draft specifications prescribed by the Belize authorities in these two notifications. Hence, we would like to request the Belize authorities to accept Indian standards so that it will facilitate diesel and gasoline exports from India. In this regard, India would like to seek bilateral consultation with Belize authorities.

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27	G/TBT/N/THA/217/Rev.1/Add.1	Thailand	Mandatory standards for steel products	<p>These notifications specify:</p> <ul style="list-style-type: none"> • Mandatory standards TIS 1479-25xx for hot rolled flat steel to be used in general structures • Mandatory standards TIS 2012-25xx for cold reduced flat steel of commercial and drawing qualities <p>These standards specifies types, grades, symbols, chemical compositions, mechanical properties, basis mass, sizes and tolerances, general requirements, marking, labelling and sampling.</p>
28	G/TBT/N/THA/42/Rev.1/Add.1	Thailand	Mandatory standards for steel products	<p>In reply, India stated that:</p> <p>In India, steel products are regulated as per Steel and Steel Products (Quality Control) order, 2012 issued by the Ministry of Steel, Government of India. It has prescribed 10 mandatory standards for hot rolled and cold rolled steel products. The Bureau of Indian Standards (BIS) has established laboratories for testing of steel products in India. Please find below the list of mandatory standards for the above mentioned steel products:</p> <ol style="list-style-type: none"> 1. IS 15391: Cold Rolled Non-Oriented Electrical Steel Sheet and Strip - Semi-Processed Type 2. IS 648: Cold rolled non-oriented electrical steel sheets and strip-fully processed type (CRNO) 3. IS 5872: Cold Rolled Steel Strips (Box Strappings) 4. IS 513: Cold reduced low carbon steel sheets and strips 5. IS 1079: Hot Rolled Carbon Steel Sheet and Strip 6. IS 5986: Hot Rolled Steel Flat Products for Structural Forming and Flanging Purposes 7. IS 7283: Hot Rolled bars for production of bright bars and machined parts for engineering applications 8. IS 10748: Hot Rolled Steel Strip for Welded Tubes and Pipes 9. IS 11513: Hot Rolled Carbon Steel Strip For Cold

Sl. No.	Notification Number	Members	Products	Status
				<p>Rolling Purposes</p> <p>10. IS 2062: Hot rolled medium and high tensile structural steel</p> <p>11. IS 15647: Hot rolled steel narrow width strip for welded tubes and pipes</p> <p>We would like to state that India also follows similar regulatory requirements for steel products. Further, BIS is a founder member of International Organization for Standardization (ISO). BIS has signed Memorandum of Understandings (MoUs) in the fields of standardization and conformity assessment with 21 countries.</p> <p>Hence, we would like to request the Thai authorities to accept the above mentioned mandatory standards for hot rolled and cold reduced steel products and also provide accreditation to BIS certified testing labs, which will facilitate exports from India.</p> <p>Hence, we would like to request the Thai authorities to provide equivalence and allow exports, which confirm to Indian standards. In this regard, India would like to seek bilateral consultation with Thailand on this issue.</p>
29	G/TBT/N/CHL/407	Chile	Food products	<p>The Ministry of Health has issued this notification on Public Consultation for the Modification of Article 518 of the Sanitary Regulation of Foods, Supreme Degree no. 977/96 of the Ministry of Health.</p> <p>The regulation proposes to modify the gluten limit in foods that are labeled as gluten-free and the maximum gluten level must be 5 mg/kg.</p> <p><u>In reply, India stated that:</u></p> <ul style="list-style-type: none"> India observes that the modification concerning gluten limit for label claim - 'gluten free' has been increased from 3 mg/kg to 5 mg/kg. However, we find that proposed gluten limit of 5 mg/kg to be stricter than the limit set by India as per the Food Safety and Standards Regulations,

Sl. No.	Notification Number	Members	Products	Status
				<p>2011. Hence, we would like to request the Chilean authorities to explain the scientific rationale for setting up the criteria of not exceeding 5 mg/kg for using the label claim - 'gluten free' in food products.</p> <ul style="list-style-type: none"> • Further, we find that the notifying agency has mentioned CODEX STAN 118-1979 as relevant document. However, we find that the Chilean proposed gluten limit of 5 mg/kg to differ from the Codex standard of 20 mg/kg. • India is of the view that such stricter levels than the international standard may pose restriction on trade of food products. Hence, we would like to request the Chilean authorities to consider the Codex levels so that it may not pose a negative effect on trade of food products.

Note: