

中国 WTO/SPS 国家通报咨询中心

China WTO/SPS National Notification & Enquiry Center

No.20, East street, He ping li, Dong Cheng District, Beijing, China, Tel: 86 10 57954642

FAX

To: The Brazilian Health and Regulatory Agency	Email:rel@anvisa.gov.br
Date: July 15, 2024	Number of pages: 2+2
Copies to	
Department for WTO Affairs, Ministry of Commerce of the People's Republic of China	E-mail: hailinna@mofcom.gov.cn
Permanent Mission of the People's Republic of China to the World Trade Organization	E-mail: bizhonglin@126.com
General Administration of Customs of China	E-mail: qilinlei_ellen@126.com
From:	
China WTO/SPS National Notification & Enquiry Center, Research Center of GACC for International Inspection and Quarantine Standards and Technical Regulations	Tel: 86-10-57954645 E-mail: sps@customs.gov.cn
Subject:	
Comments from P. R. China on Notification G/SPS/N/BRA/2301	

Comments from P. R. China on Notification G/SPS/N/BRA/2301

Dear Sir or Madam:

We appreciate the opportunity to submit comments from the P. R. China on the notified regulation proposed by the Brazilian Health and Regulatory Agency.

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.

Thank you very much in advance if the Brazilian Health and Regulatory Agency could take into-account the comments from the P. R. China. Your formal reply will be very much appreciated.

Best regards,

Mr. Jiao Yang



Deputy Director General

WTO/SPS National Enquiry Point, the P. R. China

E-mail: sps@customs.gov.cn

Comments from P. R. China on Notification G/SPS/N/BRA/2301

China is grateful to Brazil for fulfilling its WTO transparency obligations and providing other WTO members with the opportunity to comment SPS Notification No. G/SPS/N/BRA/2301. After careful consideration, China is willing to provide comments on the notification, and Brazil is invited to consider China's comments. The details of China's comments are as follows:

China agrees that Brazil includes active ingredient E34 - SPIDOXAMATE in the Monograph List of Active Ingredients for Pesticides, Household Cleaning Products and Wood Preservatives. According to the risk analysis principle and appropriate protection level principle under WTO/SPS, China recommends that Brazil should make further clarification on the experimental information closely related to environmental conditions, such as the efficacy, residue and environmental impact of active ingredient E34 - SPIDOXAMATE, and supplement relevant toxicology and risk analysis reports on acute oral toxicity test results ($LD_{50} > 2000 \text{ mg/kg}$), acute percutaneous toxicity test results ($LD_{50} > 2000 \text{ mg/kg}$), and acute inhalation toxicity. China also recommends that Brazil should establish an acute reference dose (DRfA) for the insecticide.

The Chinese version of comments is as below:

中国政府感谢巴西履行 WTO 透明度义务，给予其他 WTO 成员评议 G/SPS/N/BRA/2301 号通报的机会，中方经过认真研究，愿就巴西 G/SPS/N/BRA/2301 号通报提出评议意见，请巴西对中方的评议意见予以考虑。中方评议意见具体内容如下：

中方同意巴方将 SPIDOXAMATE 纳入《杀虫剂、家庭清洁产品、木材防腐剂清单》，依据《WTO/SPS 协定》规定的风险分析原则和适当保护水平原则，中方建议巴方应进一步明确 SPIDOXAMATE 的药效、残留、环境影响等与环境条件密切相关的试验信息，对急性经口毒性实验结果 $LD_{50} > 2000 \text{ mg/kg}$ 、急性经皮毒试验结果 $LD_{50} > 2000 \text{ mg/kg}$ 、急性吸入毒性等补充相关毒理学报告和风险分析报告，并建议巴方制定该杀虫剂急性参考剂量（DRfA）。