



EUROPEAN COMMISSION
HEALTH AND FOOD SAFETY DIRECTORATE-GENERAL
Directorate D – Food sustainability, international relations
D2 –Multilateral International relations

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To: **WTO/SPS National Enquiry Point of the P.R.China** **E-mail:** sps@customs.gov.cn
SPS Notification and Enquiry Division
Research Center for International Inspection and Quarantine
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Mission of the People's Republic of China to the EU **E-mail:** euxinxi@mofcom.gov.cn
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Subject: Comments of the EU to the People's Republic of China's notification G/SPS/N/CHN/1150/Add.1

Dear Madame/Sir,

Please find attached the comments of the European Union to the draft regulatory text notified to the WTO in notice G/SPS/N/CHN/1150/Add.1.

Sincerely yours,

Dirk Lange
EU SPS Notification Authority

COMMENTS OF THE EUROPEAN UNION TO NOTIFICATION SUBMITTED BY THE PEOPLE'S REPUBLIC OF CHINA UNDER THE WTO AGREEMENT ON THE APPLICATION OF SANITARY AND PHYTOSANITARY MEASURES G/SPS/N/CHN/1150/ADD.1

The European Union (EU) would like to thank the People's Republic of China for submitting notification G/SPS/N/CHN/1150/Add.1 concerning the proposed revisions to the National Standard GB 2762 – xxx related to contamination limits in foods and for the opportunity to comment on the proposed text.

The EU welcomed the development of a specific contamination limit for cadmium in sea crabs. It must be considered, however, that crabs accumulate environmental metals over time in organs such as the hepatopancreas.

The EU acknowledges that preferences of Chinese consumers may differ from those of European consumers and, accordingly, that the application of the cadmium limits should apply to “all edible tissues” of the animal. However, due to the variability of the tissues present in crabs at different stages in their growth cycles and to the approach that may be taken in assembling the tissues for testing, inconsistent results may be obtained in official export controls and import controls.

To overcome this potential problem, the EU respectfully suggests that sampling and analysis should be based on equal parts of the meat from the limbs of the crab and of meat from the rest of the body. The EU recommends that this sampling practice should be specified in the document publishing the new limits, for example as follows:

Sea crabs^(*) & Manta Shrimp 3.0 mg/kg.

(*) Analysed as equal parts of limb meat and body meat.

The EU would like to thank the People's Republic of China again for the opportunity to comment on its notification and asks the People's Republic of China to take the EU comments into consideration before it is adopted.