How to Prepare Comments to TBT Notifications
- The Practice of China

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How to Prepare Comments to TBT Notifications

1. What We Have Done
2. The Working Procedures
3. Participants
4. Suggestions
5. Challenges faced
1. What We Have Done

National Enquiry Point

Established in General Administration of Customs to coordinate the notification, enquiry and comment issues domestically.
1. What We Have Done
## 2. Working procedures

- **Receiving and translating notifications - Enquiry Point**
- **Selecting notifications for comments - Enquiry Point**
- **Distributing notifications to relevant authorities – mainly by e-mail**
- **TBT Notification Newsletter – including all notifications, published every month**
- **Notifications and their Chinese translation also available on the website [www.tbt-sps.gov.cn](http://www.tbt-sps.gov.cn)**
- **Encourage stakeholders to use ePing system**
2. Working procedures (cont. 1)

- Studying and making comments on notifications - Expert group set up by all Chinese government authorities related to TBT issues
- Examining comments - competent authorities
- Collecting comments - Enquiry Point
- Translating the final comments into English and submitting to the notification Member - Enquiry Point
- Coordination between different stakeholders: Important notifications or Disagreement on comment
2. Working procedures (cont. 2)

- Receiving responses - Enquiry Point
- Feedback for reference or further comment
- Considering to raise a Specific Trade Concern
3. Participants

Participants of commenting

- Experts in the Customs
- Experts from other government authorities
- Associations and industries
- Universities and research institutes
3. Participants

- Research and comment centers
  - Household appliance
  - Automobile
  - Toy
  - Textile
  - Fireworks
  - .......
4. Suggestions

In order to be more effective, a comment is better to:

- Be as detailed as possible
- Compare with the practice of similar Members
- Compare with international standards
- Use scientific evidence
- Give suggestions
5. Challenges faced

Translation

1. Large amount of works – notifications and full texts

2. Costly for both money and time

3. Non English foreign languages
5. Challenges faced

Some notifications less than 60 days

Request for extending with no response
5. Challenges faced

- The activeness to make comments
  - The awareness of the importance of making comments is not satisfactory. Especially small and medium-sized enterprises should be encouraged to make comments.
  - Training of industries should be strengthened.
  - The enquiry point takes the responsibility of leading the stakeholders to make comments and providing help.
5. Challenges faced

- How to choose the notifications to be commented
- Assessment of the notifications
- How to evaluate the impact of a notification on trade
- The enquiry point
5. Challenges faced

Some email addresses do not work

Could not receive responses

Submitting comments
Thank You