

COMMENTS FROM THE EUROPEAN UNION CONCERNING NOTIFICATIONS

G/TBT/N/CHN/1094

NATIONAL STANDARD OF THE PEOPLE'S REPUBLIC OF CHINA: LIMIT OF VOLATILE ORGANIC COMPOUNDS AND MIGRATION OF HEAVY METAL OF WOOD BASED FURNITURE, AND

G/TBT/N/CHN/1095

NATIONAL STANDARD OF THE PEOPLE'S REPUBLIC OF CHINA: LIMITS OF VOLATILE ORGANIC COMPOUNDS, DECOMPOSABLE AROMATIC AMINE AND FLAME RETARDANT FOR UPHOLSTERED FURNITURE MATTRESS, AND

G/TBT/N/CHN/1096

NATIONAL STANDARD OF THE PEOPLE'S REPUBLIC OF CHINA: LIMITS OF VOLATILE ORGANIC COMPOUNDS, DECOMPOSABLE AROMATIC AMINE

The European Union (EU) would like to thank the Chinese authorities for their written answer of 10 November 2015 to EU comments on G/TBT/N/CHN/1094, G/TBT/N/CHN/1095 and G/TBT/N/CHN/1096 of 6 October 2015.

The EU would also like to thank the Chinese authorities for the constructive exchange held on the margins of the TBT Committee on 10 March in Geneva. The EU appreciates the announcement conveyed then by the Chinese authorities that Total Volatile Organic Compound (TVOC) requirements will be applied on a voluntary basis instead of on a mandatory basis. The EU would like to seek confirmation of this point, request a number of related clarifications, and convey additional points.

The EU would like to receive information on whether the Chinese authorities intend to consider the standards as a whole as voluntary or only the TVOC requirements. In case only the TVOC requirements remain voluntary, the EU would like to know what exactly will be considered as voluntary, e.g. either the TVOC limits set out in the standards, or the testing method set out in the standards and their annexes, or both of these items. The EU would also like to know whether this will apply to all three notified drafts.

The EU would appreciate receiving information from the Chinese authorities regarding the intended status of the other mandatory limits and requirements included in the notified drafts (e.g. formaldehyde emissions), i.e. whether they will become mandatory or will be considered as voluntary.

The EU understands from their reply that the Chinese authorities will not accept equivalent international standards and would like to ask the Chinese authorities to confirm this understanding. In this respect, the EU would like to encourage the Chinese authorities to accept equivalent international standards, in particular ISO standards, for the product categories covered by the notified drafts. The potential effect of the Chinese national deviations under consideration would not only be to make trade in furniture more expensive but it could even disrupt it significantly. In this respect, should China consider that the relevant ISO standards could be improved;

the EU would like to invite China to bring its proposals for discussion to the ISO. This will enable improvements to be considered without creating differences between Chinese and international standards and would thus avoid unnecessary barriers to trade.

The EU would also appreciate it if the Chinese authorities could share some details on the timeline foreseen for the adoption of the notified drafts.

The EU would be grateful if the above-mentioned comments could be taken into account and responded to.