[Letterhead]

Date

European Commission

DG Health and Food Safety, Unit D2-Multilateral International Relations

Rue Froissart 101

B-1049 Brussels

sps@ec.europa.eu

Dear Sir or Madam:

This letter is in reference to the new dairy [and/or colostrum and/or composite] certificates notified to the WTO on 28 July 2020 through G/SPS/N/EU/401. This notification includes new certificate models for [dairy and/or colostrum and/or composite] products that are of particular concern to us as importers of [products].

[Importing company overview. May include locations of production and types of products produced. Total annual sales within the EU may be added if desired. Please include importance of imports from the U.S. in the company’s supply chain.]

The new draft certificates contain a significant number of new attestations, particularly in the animal health sections. The proposed language moves away from the World Organization for Animal Health’s (OIE) recommendations and a country’s recognized disease control status, and instead requires foreign governments to attest to the use of specific regulatory control measures. We are concerned that this shift is not in keeping with international guidance and does not appear to consider regulatory models or structures in other countries that ensure safe products.

We urge the Commission to consult with the competent authorities in key trading partners prior to finalization and consider their feedback. We encourage the Commission to make any necessary modifications to the certificates so that trade may continue uninterrupted.

It is critical to our business that we retain the ability to import dairy [and/or colostrum and/or composite] products as needed to fulfill our production schedules. We kindly ask the European Commission to exercise flexibility in negotiating certification language with trading partners to ensure the continuity of trade, particularly for products sourced from countries with a strong disease control status.

Sincerely,

Your Name

Title