

ORGANIZACIÓN MUNDIAL DEL COMERCIO

G/TBT/N/CHN/174
1º de diciembre de 2005

(05-5715)

Comité de Obstáculos Técnicos al Comercio

Original: inglés

NOTIFICACIÓN

Se da traslado de la notificación siguiente de conformidad con el artículo 10.6.

1.	Miembro que notifica: <u>REPÚBLICA POPULAR CHINA</u> Si procede, nombre del gobierno local de que se trate (artículos 3.2 y 7.2):
2.	Organismo responsable: Administración de Normalización de China (SAC) Nombre y dirección (incluidos los números de teléfono y de telefax, así como las direcciones de correo electrónico y sitios Web, en su caso) del organismo o autoridad encargado de la tramitación de observaciones sobre la notificación, en caso de que se trate de un organismo o autoridad diferente:
3.	Notificación hecha en virtud del artículo 2.9.2 [X], 2.10.1 [], 5.6.2 [], 5.7.1 [], o en virtud de:
4.	Productos abarcados (partida del SA o de la NCCA cuando corresponda; en otro caso partida del arancel nacional. Podrá indicarse además, cuando proceda, el número de partida de la ICS): Cuero, piel y sus productos de uso diario, como calzado de cuero o de piel, prendas de cuero o de piel, y otros productos de cuero, etc., excepto los empleados en sectores industriales y especializados. (ICS: 59.140.30, 59.140.35, 61.020, 61.040, 61.060; SA: 4104, 4105, 4106, 4107, 4108, 4109, 4110, 4111, 4201, 4202, 4203, 4205, 4302, 4303, 4304, 6403)
5.	Título, número de páginas e idioma(s) del documento notificado: <i>National Standard of the P.R.C., Leather and Fur - Limit of Harmful Matter</i> (Norma Nacional de la República Popular China – Cuero y piel – Límites de sustancias nocivas) – 8 páginas, disponible en chino
6.	Descripción del contenido: La norma notificada especifica el límite de las sustancias nocivas y la normativa de inspección de los productos de cuero y de piel. Se aplica a los productos de cuero y de piel de uso diario (excluido los materiales sin elaborar), calzado de cuero, prendas de cuero y de piel, muebles de cuero y otros productos de cuero y de piel que se manufacturen, vendan y utilicen en el territorio de China. Los capítulos 5 y 7 de esta norma tienen carácter obligatorio; los restantes son de aplicación voluntaria. La norma establece tres categorías de productos: A) productos para niños; B) productos para usar en contacto directo con la piel; y C) productos que no entran en contacto directo con la piel. Además, prescribe los límites pertinentes que se indican a continuación:

Producto	Clase A	Clase B	Clase C
formaldehído (mg/kg) ≤	20	75	300 (cuero de oveja rasado blanco 600)
arilaminas capaces de desdoblamiento (mg/kg) ≤	30	30	30

7. Objetivo y razón de ser, incluida, cuando proceda, la índole de los problemas urgentes:
Protección de la salud de las personas

8. Documentos pertinentes:
ISO/TS 17234:2003: Cuero – Pruebas químicas – Determinación de determinados tintes azoicos en el cuero teñido
ISO/TS 17226:2003: Cuero – Pruebas químicas – Determinación del contenido de formaldehído

9. Fecha propuesta de adopción: 90 días contados a partir de la fecha de distribución por la Secretaría de la OMC
Fecha propuesta de entrada en vigor: 6 meses después de su adopción

10. Fecha límite para la presentación de observaciones: 60 días contados a partir de la fecha de distribución por la Secretaría de la OMC

11. Textos disponibles en: Servicio nacional de información [X], o dirección, números de teléfono y de telefax, correo electrónico y dirección del sitio Web, en su caso, de otra institución:
WTO/TBT National Notification and Enquiry Center of the People's Republic of China
(Centro nacional de notificación e información OMC-OTC de la República Popular China)
Teléfono: (+86) 10 822 60618; telefax: (+86) 10 822 62448
Correo electrónico: tbt@aqsiq.gov.cn

ICS 59.140.30

Y 46



中华人民共和国国家标准

GB ××××—××××

皮革和毛皮 有害物质限量

Leather and fur—Limit of harmful matter

(报批稿)

(本稿完成日期：2004年7月6日)

××××-××-××发布

××××-××-××实施

国家质量监督检验检疫总局 发布

前 言

本标准的第5章、第7章为强制性的，其余为推荐性的。

本标准有害物质含量的要求与欧盟、日本、美国禁用有害物质含量要求保持一致。

本标准的附录A为规范性附录，附录B为资料性附录。

本标准由中国轻工业联合会提出。

本标准由全国皮革工业标准化技术委员会（SAC/TC 252）归口。

本标准起草单位：中国皮革和制鞋工业研究院、国家毛皮质量监督检验中心、嘉兴出入境检验检疫局、辛集市佰利特皮业有限公司、广东新会皮革化工厂有限公司、新乡黑田明亮制革有限公司。

本标准主要起草人：赵立国、那日苏、沈兵、刘显奎、徐法申、骆国书、贺明亮、郑玉山。

皮革和毛皮 有害物质限量

1 范围

本标准规定了皮革、毛皮产品中有害物质限量及其检验方法。

本标准适用于日用皮革和毛皮产品。

本标准不适用于工业用、特种行业用皮革和毛皮产品。出口产品应符合出口合同约定或进口国的规定。

2 规范性引用文件

下列文件中的条款通过本标准的引用而成为本标准的条款。凡是注日期的引用文件，其随后所有的修改单（不包括勘误的内容）或修订版均不适用于本标准，然而，鼓励根据本标准达成协议的各方研究是否可使用这些文件的最新版本。凡是不注日期的引用文件，其最新版本适用于本标准。

GB/T XXXX 皮革和毛皮 化学试验 禁用偶氮染料的测定(GB/T XXXX-2005, ISO/TS 17234: 2003, Leather— Chemical tests — Determination of certain azo colourants in dyed leather, MOD)

GB/T XXXX 皮革和毛皮 化学试验 甲醛含量的测定(GB/T XXXX-2005, ISO/TS 17226: 2003, Leather —Chemical tests — Determination of formaldehyde content in leather, MOD)

3 术语和定义

3.1 婴幼儿用品 products for babies

年龄在24个月以内（含）的婴幼儿使用的产品。

3.2 直接接触皮肤的产品 products with direct contact to skin

在穿着或使用，产品的大部分面积直接与人体皮肤接触的产品。

3.3 非直接接触皮肤的产品 products without direct contact to skin

在穿着或使用，产品不直接与人体皮肤接触，或仅有小部分面积直接与人体皮肤接触的产品。

4 分类

产品按最终用途进行分类：

A类：婴幼儿用品；

B类：直接接触皮肤的产品；

C类：非直接接触皮肤的产品。

5 要求

皮革、毛皮中有害物质限量值应符合表1的规定。

表1 有害物质限量值

项 目	限 量 值		
	A 类	B 类	C 类
可分解有害芳香胺染料, mg/kg	≤ 30		
游离甲醛, mg/kg	≤ 20	≤ 75	≤ 300 (白羊剪绒≤ 600)

表 1 有害物质限量值 (续)

注:被禁芳香胺名称见附录 A。如果 4-氨基联苯和 (或) 2-萘胺的含量超过 30 mg / kg, 且没有其它的证据, 以现有的科学知识, 尚不能断定使用了禁用偶氮染料。

6 试验方法

6.1 禁用偶氮染料的测定

按 GB/T XXXX 的规定进行。

6.2 游离甲醛的测定

按 GB/T XXXX 的规定进行。当发生争议、仲裁检验时, 以色谱法为准。

7 检验规则

7.1 型式检验

有下列情况之一者, 应进行型式检验。

- a) 生产配方、工艺、原材料有重大改变时;
- b) 产品长期停产后恢复生产时;
- c) 国家质量技术监督部门提出进行型式检验时;
- d) 生产正常时, 每年至少进行一次型式检验。

7.2 抽样数量

每批产品中随机抽取 3 件有代表性样品进行检验, 样品抽取后密封放置, 不应进行任何处理。

7.3 合格判定

7.3.1 单件判定规则

如果所有项目的检验结果符合本标准规定的要求, 即判定为合格。如果检验结果未达到本标准要求时, 应对保存样品进行复验, 如果结果仍未达到本标准要求时, 则判定为不合格。

7.3.2 整批判定规则

3件被测样品, 全部合格, 则判该批产品合格。如有1件 (及以上) 不合格者, 加倍抽样6件进行复验。复验中6件全部合格, 则判定该批产品合格。

8 检验报告

检验报告应包括以下内容:

- a) 本标准名称和编号;
- b) 样品名称、生产单位及批号;
- c) 取样方法;
- d) 使用仪器名称及型号;
- e) 试验结果;
- f) 在试验过程中出现的异常情况;
- g) 试验人员、日期。

附 录 A
(规范性附录)
23 种被禁芳香胺名称

表 A.1 23种被禁芳香胺名称

序号	芳 香 胺 名	化学文摘编号
1	4-氨基联苯(4-Aminodiphenyl)	92-67-1
2	联苯胺(Benzidine)	92-87-5
3	4-氯邻甲苯胺(4-Chloro- <i>o</i> -toluidine)	95-69-2
4	2-萘胺(2-Naphthylamine)	91-59-8
5	邻氨基偶氮甲苯(2-Aminoazotoluene)	97-56-3
6	2-氨基-4-硝基甲苯(2-Amino-4-nitrotoluene)	99-55-8
7	对氯苯胺(<i>p</i> -Chloroaniline)	106-47-8
8	2, 4-二氨基苯甲醚(2, 4-Diaminoanisole)	615-05-4
9	4, 4' -二氨基二苯甲烷(4, 4' -Diaminodiphenylmethane)	101-77-9
10	3, 3' -二氯联苯胺(3, 3' -Dichlorobenzidine)	91-94-1
11	3, 3' -二甲氧基联苯胺(3, 3' -Dimethoxybenzidine)	119-90-4
12	3, 3' -二甲基联苯胺(3, 3' -Dimethylbenzidine)	119-93-7
13	3, 3' -二甲基-4, 4' -二氨基二苯甲烷(3, 3' -Dimethyl-4, 4' -Diaminodiphenylmethane)	838-88-0
14	3-氨基对甲苯甲醚(<i>p</i> -克利酞)(<i>p</i> -Cresidine)	120-71-8
15	4, 4' -次甲基-双-(2-氯苯胺) [4, 4' -Methylene-bis-(2-Chloroaniline)]	101-14-4
16	4, 4' -二氨基二苯醚(4, 4' -Oxydianiline)	101-80-4
17	4, 4' -二氨基二苯硫醚(4, 4' -Thiodianiline)	139-65-1
18	邻甲苯胺(2-Toluidine)	95-53-4
19	2, 4-二氨基甲苯(2, 4-Toluylenediamine)	95-80-7
20	2, 4, 5-三甲基苯胺(2, 4, 5-Trimethylaniline)	137-17-7
21	邻甲氧基苯胺(邻氨基苯甲醚)(2-Anisidine)	90-04-0
22	2, 4-二甲基苯胺(2, 4-Xylidine)	95-68-1
23	2, 6-二甲基苯胺(2, 6-Xylidine)	87-62-7

附录 B
(资料性附录)
产品分类示例

表B.1给出的产品作为陈述产品分类的示例。表B.1中没有列出的产品应按照产品的最终用途确定类型。

表 B.1 产品分类示例

分 类	典 型 示 例
A类：婴幼儿用品	内衣、手套、袜子、外衣、帽子、床上用品
B类：直接接触皮肤的产品	内衣、无衬里手套、袜子、皮凉席、无衬里直接贴身穿着衣物
C类：非直接接触皮肤的产品	皮衣、裤子、裙子、挂毯、装饰物

VERSION NO OFICIAL

China Proposed Limit of Harmful Matter on Leather and Fur

1. Scope

China proposes a new national standard to restrict the use of azodyes and formaldehyde for leather and fur articles.

The standard is applicable to daily used leather and fur products (exclude raw materials) such as: leather shoes, leather and fur garments, leather furniture and other leather and fur products, which are produced, sold and used within the territory of China. Chapters 5 and 7 of this standard are mandatory, other chapters are voluntary.
(Se aplica a los productos de cuero y de piel de uso diario (excluido los materiales sin elaborar), calzado de cuero, prendas de cuero y de piel, muebles de cuero y otros productos de cuero y de piel que se manufacturen, vendan y utilicen en el territorio de China. Los capítulos 5 y 7 de esta norma tienen carácter obligatorio; los restantes son de aplicación voluntaria.)

2. Standard Reference Documents

GB/T XXXX 皮革和毛皮 化学试验 禁用偶氮染料的测定(GB/T XXXX-2005, ISO/TS 17234: 2003, Leather— Chemical tests — Determination of certain azo colourants in dyed leather, MOD)
GB/T XXXX 皮革和毛皮 化学试验 甲醛含量的测定(GB/T XXXX-2005, ISO/TS 17226: 2003, Leather — Chemical tests — Determination of formaldehyde content in leather, MOD)

Test Methods

ISO/TS 17234:2003

Leather -- Chemical tests -- Determination of certain azo colourants in dyed leathers

Abstract

ISO/TS 17234:2003 specifies a method for detecting the use of certain azo colourants which may release aromatic amines.

ISO/TS 17226:2003

Leather -- Chemical tests -- Determination of formaldehyde content

Abstract

ISO/TS 17226:2003 specifies two methods for the determination of free and released formaldehyde in leathers. One method is relatively simple with regard to the laboratory equipment (colorimetric method), while the other needs more sophisticated equipment (HPLC method). The HPLC method is selective and not sensitive to coloured extracts

3. Definitions

3.1 婴幼儿用品 ~~products for babies~~

年龄在24个月以内(含)的婴幼儿使用的产品。

3.2 直接接触皮肤的产品 ~~products with direct contact to skin~~

在穿着或使用吋, 产品的大部分面积直接与人体皮肤接触的产品。

3.3 非直接接触皮肤的产品 ~~products without direct contact to skin~~

在穿着或使用吋, 产品不直接与人体皮肤接触, 或仅有小部分面积直接与人体皮肤接触的产品。

4. Classification of Products

There are 3 product categories:

1. Cat. A - Products for babies (products for babies and children up to the age of 24 months);
2. Cat. B - Products in direct contact with skin (which are worn with a large part of surface in direct contact with the skin); and
3. Cat. C - Products without direct contact with skin (which are worn with only a little part of surface in direct contact with the skin).

5. Requirements (mandatory)

Tables of requirements :

Producto	Clase A	Clase B	Clase C
formaldehído (mg/kg) ≤	20	75	300 (cuero de oveja rasado blanco 600)
arilaminas capaces de desdoblamiento (mg/kg) ≤	30	30	30

VERSION NO OFICIAL

表 1 有害物质限量值 (续)

注:被禁芳香胺名称见附录 A。如果 4-氨基联苯和 (或) 2-萘胺的含量超过 30 mg/kg, 且没有其它的证据, 以现有的科学知识, 尚不能断定使用了禁用偶氮染料。

6. Experiment Methods

7 Inspection Rules (mandatory)

8 Inspection Report

Appendix A

A.1: List of aromatic amines (23):

	CAS Number	Substances
1	92-67-1	4-aminobiphenyl
2	92-87-5	Benzidine
3	95-69-2	4-chloro-o-toluidine
4	91-59-8	2-naphthylamine
5	97-56-3	2-aminoazotoluene
6	99-55-8	2-amino-4-nitrotoluene
7	106-47-8	p-chloroaniline
8	615-05-4	2,4'-diaminoanisole
9	101-77-9	4,4'-diaminodiphenylmethane
10	91-94-1	3,3'-dichlorobenzidine
11	1 19-90-4	3,3'-dimethoxybenzidine
12	119-93-7	3,3'-dimethylbenzidine
13	838-88-0	3,3'-dimethyl-4,4'-diaminodiphenylmethane
14	120-71-8	p-cresidine
15	101-14-4	4,4'-methylene-bis-(2-chloroaniline)
16	101-80-4	4,4'-oxydianiline
17	139-65-1	4,4'-thiodianiline
18	95-53-4	2-toluidine
19	95-80-7	2,4-toluylenediamine
20	137-17-7	2,4,5-trimethylaniline
21	90-04-0	2-anisidine
22	95-68-1	2,4-xylidine
23	87-62-7	2,6-xylidine

Appendix B

表 B.1 产品分类示例

分 类	典 型 示 例
A类: 婴幼儿用品	内衣、手套、袜子、外衣、帽子、床上用品
B类: 直接接触皮肤的产品	内衣、无衬里手套、袜子、皮凉席、无衬里直接贴身穿着的衣物
C类: 非直接接触皮肤的产品	皮衣、裤子、裙子、挂毯、装饰物



Ministerio de Economía y Producción
Subsecretaría de Defensa del Consumidor

Buenos Aires, February 6, 2006

To:

WTO/TBT National Notification and Enquiry
Center of the People's Republic of China

Fax: (+86) 10 822 62448
(+86) 10 822 60618
E-mail: tbt@aqsiq.gov.cn

From:

Punto Focal OTC-OMC de la República
Argentina

Fax: (54 11) 4349-4072
Tel: (54 11) 4349-4067
E-mail: focalotc@mecon.gov.ar

Subject: G/TBT/N/CHN/174 "Leather and Fur - Limit of Harmful Matter"

Message: Resent fax. Date 2006.01.30

Thank you for your attention

Viviana Camaly
Punto Focal OTC OMC Argentina
<http://www.puntofocal.gov.ar>

Number of pages: 1 + 3

INFORME DE CONFIRMACION

30-01-2006 20:43

FAX NUMERO :

NOMBRE :

NRO. FAX/NOMBRE : 1000861082260618

PAGINA(S) : 2

HORA DE INICIO : 30-01 20:42

TIEMPO TRANSCURRIDO : 01'30"

MODO : ESTANDAR

RESULTADOS : OK



Ministerio de Economía y Producción
Subsecretaría de Defensa del Consumidor

Buenos Aires, January 2006

To:

WTO/TBT National Notification and Enquiry
Center of the People's Republic of China

Fax: (+86) 10 822 62448

E-mail: tbt@aqsiq.gov.cn

From:

Punto Focal OTC-OMC de la República
Argentina

Fax: (54 11) 4349-4072

Tel: (54 11) 4349-4067

E-mail: focalotc@mecon.gov.ar

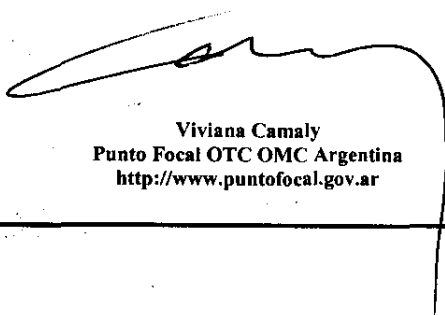
Subject: G/TBT/N/CHN/174 "Leather and Fur - Limit of Harmful Matter"

Message:

Dear Sir or Madam

Please find attached the comments to the above-mentioned notification.

Best regards,


Viviana Camaly
Punto Focal OTC OMC Argentina
<http://www.puntofocal.gov.ar>

Number of pages: 1 + 1

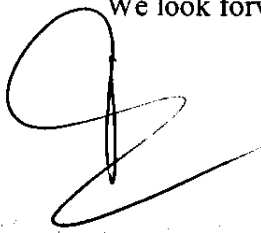
COMMENTS FROM ARGENTINA RELATING TO NOTIFICATION G/TBT/N/CHN/174

National Standard of the P.R.C., Leather and Fur - Limit of Harmful Matter

Argentina would like to underline the following issues in relation to this notification.

1. The Agreement on Technical Barriers to Trade established: *"2.11 Members shall ensure that all technical regulations which have been adopted are published promptly or otherwise made available in such a manner as to enable interested parties in other Members to become acquainted with them."*, and
2. The G/TBT/1/Rev.8 said...*In order to avoid difficulties that can arise from the fact that the documentation relevant to technical regulations, standards and procedures for assessment of conformity is not available in one of the WTO working languages and that a body other than the enquiry point may be responsible for such documentation, the Committee agreed ..."* an especial procedures.¹
3. The Enquiry Point of China sent the full text in original language. By petition of Argentina, clarified only some titles in english, but that is insufficient to know the proposal. For example, the titles or chapters 5 and 7 of the proposal are mandatory. Nevertheless, Argentina does not yet know the content of the chapter 7. Argentina does neither know the content of the chapters 6 and 8 neither what says the annex B neither says the aggregate notes.
4. Finally, Argentina are requesting that the comment deadline date be extended until China indicate or give access to traduced text in any official language the WTO.

We look forward to your favorable response to this request.



¹ G/TBT/1/Rev.8 III. 4. Recommendation and Decisions *"(b) upon receipt of a request for documents, any translated summaries that exist in the language of the requester or, as the case may be, in a WTO working language, shall be automatically sent with the original of the documents requested;..."*



Ministerio de Economía y Producción
Subsecretaría de Defensa del Consumidor

Buenos Aires, February 23, 2006.

To:
WTO/TBT National Notification and Enquiry
Center of the People's Republic of China

Fax: (+86) 10 822 62448
E-mail: tbt@aqsiq.gov.cn

From:
Punto Focal OTC-OMC de la República
Argentina

Fax: (54 11) 4349-4072
Tel: (54 11) 4349-4067
E-mail: focalotc@mecon.gov.ar

Subject: G/TBT/N/CHN/174 "Leather and Fur - Limit of Harmful Matter"

Message:

Dear Sir or Madam

Please find attached the comments to the above-mentioned notification.

Best regards,

Viviana Camaly
Punto Focal OTC OMC Argentina
<http://www.puntofocal.gov.ar>

Number of pages: 1 + 1

**COMMENTS FROM ARGENTINA RELATING TO NOTIFICATION G/TBT/N/CHN/174
CONTINUATION OF THE SENT COMMENTS 01.30.2006**

National Standard of the P.R.C., Leather and Fur - Limit of Harmful Matter

Continuation of the Comments of January 30, 2006

Argentina has request the English version and in the meantime, Argentina would like to formulate the following questions:

1 范围	<p>A. This chapter is the scope? It's equal to the Point 6 (description of content) of the notification? Could you clarify this issue?</p> <p>B. If it's thus, for what reason excludes the raw materials (wet-blue, finished, others)?</p>
2 规范性引用文件	<p>C. This chapter is the Point 8(Relevant documents) of the notification? <u>Y/N</u></p> <p>D. Could you say what adds above standards ISO (in the first paragraph)?</p>
3 术语和定义	<p>E. This chapter contains the definitions of kinds or categories? <u>Y/N</u></p> <p>F. Could you complete the texts in English that follow to the Chinese version?</p>
4 分类	<p>G. In this chapter were mentioned three categories. Have these categories an international reference? <u>Y/N</u></p> <p>H. Where are available for consult it?</p>
5 要求 皮革、毛皮中有害物质限量值应符合表1的规定。 <u>表1 有害物质限量值</u>	<p>I. The requirements for one each categories was established on some international reference or scientific basis? <u>Y/N</u></p> <p>J. Where are available for consult it?</p>
表1 有害物质限量值 (续)	<p>K. Could translate the page 6 (Chapter 7.)? It's very important because contain mandatory requirements.</p>
附录 A	<p>L. What international reference or scientific basis support this list of substance, specifically # 22 and # 23?</p>
附录 B	<p>M. The Annex B contains examples? Which are these examples? Could you translate it?</p>

中华人民共和国 WTO/TBT 国家通报咨询中心

WTO/TBT National Notification & Enquiry Center of P.R.of China

FAX

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Date: March 14, 2006	Number of pages: 3+ 1
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From:	
WTO/TBT National Notification & Enquiry Center of P.R.of China	Tel: 86-10-82260618 Fax: 86-10-82262448 E-mail: tbt@aqsq.gov.cn
Subject: <u>Reply to Argentina 1st Comments on G/TBT/N/CHN/174</u> National Standard of the P.R.C., Leather and Fur - Limit of Harmful Matter	

Dear Sir or Madam:

This is referred to Argentina Comments on CHN/174 (National Standard of the P.R.C., *Leather and Fur - Limit of Harmful Matter*) dated February 6, 2006.

Please see the enclosed reply to your comments. That is in English and Chinese.

We hope this reply will be helpful to you.

Your acknowledgement of receiving will be appreciated.

Best regards

Guo Lisheng

Deputy Director General

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Reply from China to comments of Argentina relating to notification G/TBT/N/CHN/174

1. Description of the contents of National standard of the P.R.C., *Leather and fur—Limit of harmful matter* :

The Standard is developed in a form in accordance with GB/T 1.1-2000 titled as *Rules for the Structure and Drafting of Standards* and ISO/IEC Directives--Part 3 *Rules for the Structure and Drafting of International Standards*. Main contents in the notified GB Standard are arranged as follows:

Chapter 4, Classification

Chapter 5, Requirements, include the limited values of formaldehyde content and certain azo colourants.

Chapter 6, Test method,

ISO/TS 17234:2003 , *Leather—Chemical tests—Determination of certain azo colourants in dyed leather*

ISO/TS 17226:2003 , *Leather—Chemical tests—Determination of formaldehyde content in leather*

Chapter 7, Inspection rule, include: Type testing, sampling quantities, conformity assessment.

Chapter 8, Test report

Annex B, Examples of classification

2. Regulations relating to azo colourants and formaldehyde content in other areas and countries:

In European Union: Directive 2002/61/EC of the European Parliament and of the Council, which was issued on 19 July 2002. It stipulates that certain azo colourants which use 22 kinds of Aromatic Amine are banned when they are likely in direct contact with body and with releasing concentration over 30 ppm..

German: *Law for Foods and Consumer Products*

Japan: Law: *The Product Liability Law*

3. GB18401-2003 *National general safety technical code for textile products* already came into force. It was notified by WTO in June 2003. It gives limits for formaldehyde content and ban for decomposable Aromatic Amine (Cleavable arylamines).

4. There is a rather small amount of final products of Leather and fur in China that is imported from Argentina. So, this notified mandatory standard will not cause much impact on export of such products manufactured in Argentina.

Owing to the above reasons, the comment period of this notification will not be extended.

Reply in Chinese is in below:

一、对标准的有关说明:

《皮革和毛皮 有害物质限量》标准的编写格式符合我国标准 GB/T 1.1-2000 《标准化工作导则 第1部分:标准的结构和编写规则》及对应的国际标准 ISO/IEC 导则 第3部分。其中的主要内容有:

第4章, 分类;

第5章, 要求;

第6章, 试验方法;

采用了国际标准:

ISO/TS 17234: 2003, Leather— Chemical tests — Determination of certain azo colourants in dyed leather, (MOD) 皮革和毛皮 化学试验 禁用偶氮染料的测定

ISO/TS 17226: 2003, Leather — Chemical tests — Determination of formaldehyde content in leather, (MOD) 皮革和毛皮 化学试验 甲醛含量的测定

第7章, 检验规则;

第8章, 检验报告;

附录B, 产品分类示例。

内容简明易懂。

二、欧盟、日本、美国等地区和国家对甲醛含量和偶氮染料限制的相关法令:

1、2002年9月11日, 欧盟《官方公报》发布了2002/61/EC指令, 规定22种禁用芳香胺的偶氮染料, 不得用于可能与人体长期直接接触的纺织品或皮革制品。

2、日本法律: 《产品责任法》

3、德国法律: 《食品与消费品法》

三、我国强制性国家标准 GB 18401-2003《国家纺织产品基本安全技术规范》已正式实施, 要求中包括“甲醛含量”、“可分解芳香胺染料”。

四、中国从阿根廷进口的皮革、毛皮成品以及相关的制品较少, 我国强制性标准不会对阿根廷的该类产品出口造成较大影响。

鉴于以上情况, 不延长评议的截止日期。

阿根廷对中国 TBT 通报第 174 号的评议

中华人民共和国国家标准： 皮革和毛皮有害物质限量

阿根廷强调以下有关问题:

1. TBT 协定 2.11 条 “各成员应保证迅速公布已批准的技术法规，或以便于其他成员的利益相关方知晓的方式予以提供。”
2. G/TBT/1/ Rev.8 文件中提到，如果与技术法规、标准和合格评定程序有关的文件不能以 WTO 工作语言公布，或者非咨询点机构负责此类文件，都有可能導致一些困难。TBT 委员会同意了一项特殊程序¹。
3. 中国咨询点以中文提供了通报的全文。经过阿根廷请求，只有几项标题用英文表述，也不足以理解该通报草案。例如，草案的标题或第 5 和 7 章是强制性的。不过，阿根廷仍不了解第 7 章的内容。

阿根廷也不了解第 6 章和第 8 章的内容，附录 B 说的什么、所有的注解什么意思也都不了解。

4. 最后，阿根廷请求评议的截止日期给予延长，直到中国用 WTO 的官方语言说明全文或上述有关的章节。

我们希望获得贵国的肯定答复。

¹ G/TBT/1/ Rev.8 III.4. 建议与决定 “(b) 收到索要文件的询问时，应自动发送所需全文的原版，同时附上以询问者的语言、或根据情况用一种 WTO 工作语言翻译过的全文摘要...”