

## COMMENTS FROM THE EUROPEAN UNION REGARDING NOTIFICATION

### G/TBT/N/SAU/996

#### DRAFT TECHNICAL REGULATION ON TEXTILE PRODUCTS

The European Union (EU) would like to thank the Kingdom of Saudi Arabia for providing the opportunity to comment on G/TBT/N/SAU/996 concerning the draft "Technical Regulation on Textile Products".

The notified draft lays down provisions on the technical requirements for labelling and marking of textile products to be marketed in the Kingdom of Saudi Arabia, the responsibilities of regulatory and market surveillance authorities as well as penalties.

The EU welcomes the notified draft, which will allow better harmonisation with the EU rules.

Having examined the notified draft, the EU would like to make the following comments:

#### **1. Procedures to ensure the safety of products (Article (4): Obligations of Suppliers-A. General requirements)**

The EU notes that Article 4.A requires evidence of procedures that have been carried out to ensure the safety of products. The EU would appreciate receiving further information on those procedures and whether a self-declaration of the supplier is accepted.

Furthermore, the EU would also appreciate receiving further information on the requirement concerning the commitment of suppliers to provide consumers with information about risks. What exactly would be the form of such commitment and the kind of information to be provided to consumers?

#### **2. Labelling requirements – country of origin (Article (4): Obligations of Suppliers-B. Label content)**

The EU supports the objectives of labelling and marking of products, as a broadly acceptable way to provide useful information to users and consumers. In principle, labelling is addressed to the user and, in this sense, labelling information could include any information producers want to communicate to customers provided it complies with WTO obligations.

In this respect, the EU notes that the notified draft requires mandatory labelling on the country of origin. The EU would like to ask for more detailed information on how the country of origin is defined.

### **3. Labelling requirements – product weight, size or dimension and care instructions (Article (4): Obligations of Suppliers-B. Label content)**

The EU would also like to note that the notified draft requires mandatory labelling on product weight, size or dimension as well as on care instructions. The EU would like to ask for more detailed information on how the size/dimension information is defined and in particular whether reference is made to any relevant international standard.

As regards the necessary information (care instructions) about the appropriate washing and cleaning instruction that ensure the safety of the product, the EU would like to note that the GINETEX care labelling system is not free of charge for EU producers. Therefore, the EU would like to ask whether other pictograms may be used.

The EU would appreciate further information about the necessity for requiring on a compulsory basis and on a permanent label the indication of the product weight, size/dimension and care instructions as well as of the name of textile product. The EU would suggest leaving this information to be provided, on a voluntary basis (on a non-permanent label), by the producer or distributor.

To this effect, the EU would like to recall Article 2.2 of the TBT Agreement, according to which, *"Members shall ensure that technical regulations are not prepared, adopted or applied with a view to or with the effect of creating unnecessary obstacles to international trade. For this purpose, technical regulations shall not be more trade-restrictive than necessary to fulfil a legitimate objective, taking account of the risks non-fulfilment would create. Such legitimate objectives are, inter alia: national security requirements; the prevention of deceptive practices; protection of human health or safety, animal or plant life or health, or the environment. In assessing such risks, relevant elements of consideration are, inter alia: available scientific and technical information related processing technology or intended end-uses of products"*.

The EU would be grateful if the above-mentioned comments could be taken into account and replied to before adoption of the notified draft.

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