

Follow-up Study of APEC Economies' Sanitary and Phytosanitary (SPS) Notifications on Quality and Completeness of Information

APEC Committee on Trade and Investment

June 2025



**Asia-Pacific
Economic Cooperation**



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EXECUTIVE SUMMARY

Transparency is a core principle of the multilateral trading system and a fundamental obligation under the WTO Agreement on the Application of Sanitary and Phytosanitary (SPS) Measures. Through Article 7 and Annex B, WTO Members are required to notify proposed SPS measures that may affect international trade, allowing other Members and stakeholders to review and comment on them in a timely and informed manner. This process is crucial to ensuring predictability and avoiding unnecessary barriers to trade.

Recognizing the importance of transparency, APEC has prioritized initiatives aimed at improving the quality and completeness of SPS notifications among its member economies. In 2018, Peru led the initiative “Proposal on Promoting Transparency Through the Improvement of Sanitary and Phytosanitary Notifications”, which through the “Study of APEC Economies' Sanitary and Phytosanitary (SPS) Notifications” held in 2019, identified opportunities for improvement in how SPS measures were being notified to the WTO. That study focused on Item 3 (Products Covered) and Item 6 (Description of Content) in the WTO notification format—two critical components for ensuring clarity, traceability, and predictability of measures for the private sector and trading partners.

Building on that work, this follow-up study evaluates the extent to which APEC economies have addressed the issues identified in 2019. Covering the period from 2020 to 2024, the study reviews a representative sample of 865 WTO SPS notifications (498 regular and 367 emergency) submitted by APEC economies, and analyzes progress made in fulfilling transparency obligations. It also integrates insights from 44 private sector responses collected across 16 APEC economies, and takes into account the latest developments within the WTO SPS Committee—particularly the recommendations arising from the Sixth Review of the SPS Agreement (2025), which reaffirm the need to improve the quality of notifications and the management of stakeholder comments.

Findings indicate that emergency notifications tend to demonstrate better compliance with transparency principles, with clearer identification of affected products and better articulation of the measure’s objectives. However, regular notifications still present gaps, particularly in the use of HS codes and detailed descriptions of the measure content. Private sector feedback corroborates these findings, emphasizing the persistent challenge regarding the information presented in SPS notifications, which limit businesses’ ability to assess trade impacts and adapt to changing measures.

In response, this study offers concrete recommendations to improve notification practices within the APEC region, including: encouraging the systematic use of HS codes, enhancing the clarity of measure descriptions, improving coordination between competent authorities and the private sector, and promoting the use of WTO tools such as the ePing SPS&TBT Platform. Strengthening SPS transparency practices is not only essential for supporting trade facilitation, but also contributes to APEC’s overarching goals of regulatory cooperation, open markets, and a stronger, more resilient multilateral trading system.

GLOSSARY

ABAC – APEC Business Advisory Council

APEC – Asia-Pacific Economic Cooperation

COMEXPERU – Foreign Trade Association of Peru

CTI – Committee on Trade and Investment

HS – Harmonized System

ICS – International Classification of Standards

MSMEs – Micro, Small, and Medium Enterprises

MTS – Multilateral Trading System

NNAs – National Notification Authorities

NEPs – National Enquiry Points

NTBs – Non-Tariff Barriers

NTMs – Non-Tariff Measures

PPD – Public-Private Dialogue

SPS – Sanitary and Phytosanitary

TBT – Technical Barriers to Trade

WTO – World Trade Organization

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1. TRANSPARENCY OF SANITARY AND PHYTOSANITARY MEASURES IN APEC

1.1. TRANSPARENCY PRINCIPLE IN THE SPS AGREEMENT

Transparency is a fundamental principle of the multilateral trading system (MTS) under the World Trade Organization (WTO). It ensures that trade policies, regulations, and measures adopted by WTO Members are clear, predictable, and accessible. In the case of sanitary and phytosanitary (SPS) measures, transparency allows trading partners to be informed about new or modified regulations that could impact international trade.

To support transparency in SPS measures, WTO Members are required to notify proposed SPS measures in advance, allow other Members to provide comments, and take these comments into account before finalizing the measure. They must also publish these measures, designate a domestic notification authority to oversee the process, and establish an enquiry point to respond to information requests from other Members.

Currently, the Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement, 1995) and the Doha Decision on Implementation-Related Issues and Concerns (WT/MIN(01)/17, 2001) establish mandatory commitments for WTO Members. This is also complemented by the Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement (G/SPS/7/Rev.5, 2023), which serve as a practical guide to help Members comply with Article 7 and Annex B of the SPS Agreement.

Recognizing the importance of transparency, the WTO SPS Committee regularly reviews how these obligations are applied. During the Sixth Review of the SPS Agreement (G/SPS/74 and G/SPS/74/Add.1) between the years 2020 and 2024, Members highlighted the need to enhance the quality of SPS notifications, improve the process for submitting and responding to comments, and facilitate access to translations of notified measures. Members have emphasized the importance of using digital tools such as the ePing SPS&TBT Platform to better manage transparency obligations. Additional discussions have focused on clarifying the notification process for measures that do not clearly fall under the SPS or TBT Agreements and exploring ways to enhance stakeholder engagement.

As part of these efforts, in 2025, the WTO SPS Committee has established a Working Group, on Transparency with an initial two-year mandate to explore ways to improve the quality and completeness of SPS notifications, particularly regarding product coverage and measure descriptions, and to enhance the handling and visibility of comments and responses. The group will also assess challenges in determining whether a measure falls under the SPS or TBT Agreements, working in coordination with the TBT Committee where necessary. Additionally, it will collaborate with the WTO Secretariat to implement improvements such as enhancements to the ePing SPS&TBT Platform, potential updates to the Recommended Transparency Procedures, revisions to annual transparency reports (G/SPS/GEN/804 series), and adaptation of the Good Practice Guide on Commenting on a TBT Notification (G/TBT/GEN/386) to fit SPS requirements.

Additionally, the WTO Secretariat reaffirmed its commitment to keep organizing transparency workshops, bringing together officials from National Notification

Authorities (NNAs) and National Enquiry Points (NEPs) to exchange experiences and strengthen institutional capacity in managing SPS transparency obligations.

These developments have influenced the present follow-up study, providing a basis for evaluating how APEC economies have advanced in improving the quality and completeness of their SPS notifications in line with WTO best practices.

1.2. IDENTIFICATION OF THE PROBLEM

Efforts to promote trade have led to significant reductions in tariffs, yet non-tariff measures (NTMs), including Sanitary and Phytosanitary (SPS) measures, continue to pose challenges in the Asia-Pacific region. While SPS measures play a critical role in protecting human, animal, and plant health, their implementation often lacks clarity and predictability, increasing compliance costs and uncertainty—particularly for micro, small, and medium enterprises (MSMEs).

A key element of transparency in SPS measures is the obligation under Article 7 and Annex B of the WTO SPS Agreement to notify proposed SPS measures before adoption, allowing stakeholders to review and comment. However, the *Study of APEC Economies' SPS Notifications on Quality and Completeness of Information* (2019) identified key items that needed improvement such as "Covered Products" and "Description of Content", thus trade partners could increase their ability to interpret and assess these measures. These gaps particularly impact developing economies, where producers face greater challenges in complying with regulatory requirements.

In addition, the 2019 study revealed that emergency SPS notifications tend to be more complete and detailed than regular notifications, likely due to their urgent nature. However, even in emergency cases, the same key items in the regular notifications, "Covered Products" and "Description of Content," were also identified for improvement in accordance with WTO recommendations.

The Sixth Review of the SPS Agreement (2025) reaffirmed the need to improve the quality and accessibility of SPS notifications. WTO Members highlighted concerns regarding insufficient clarity in product identification, poor handling of stakeholder comments, and limited access to translations of regulatory texts. In response, in 2025, the WTO SPS Committee established a Working Group on Transparency, tasked with:

- Improving the quality and completeness of SPS notifications, particularly the accuracy of product coverage and measure descriptions.
- Enhancing the notification comment process, ensuring that responses to stakeholder input are more structured and visible.
- Addressing challenges in determining whether a measure falls under the SPS or TBT Agreements, in coordination with the WTO TBT Committee.
- Modernizing transparency tools, such as the ePing SPS&TBT Platform, to facilitate stakeholder engagement and streamline regulatory access.

At the APEC level, addressing these transparency gaps remains critical to trade facilitation and regulatory cooperation. The Bogor Goals emphasize the importance of reducing non-tariff barriers (NTBs), particularly those arising from unclear regulatory processes. However, business perspectives often diverge from those of government regulators: while government officials may perceive SPS measures as clear and

transparent, private sector stakeholders frequently report difficulties in obtaining relevant and timely information.

This follow-up study builds upon the 2019 APEC study and the latest WTO transparency discussions, evaluating how APEC economies have progressed in enhancing the quality and completeness of their SPS notifications. By identifying gaps and proposing recommendations, the study aims to align SPS transparency practices with the obligations and guidelines established under the WTO SPS Agreement, particularly Article 7 and Annex B, and its recommended procedures, contributing to a more predictable trade environment and supporting APEC's broader efforts to facilitate trade and strengthen the multilateral trading system.

In addition, the 2019 APEC study identified specific items in APEC Economies SPS notifications that needed improvement, among them were Item 3 (Products Covered) and Item 6 (Description of Content). In this sense, this follow-up study examines whether APEC economies have improved these areas and where further enhancements are needed.

Finally, it is worth mentioning that the PPD held in 2019 under the initiative "Proposal on Promoting Transparency Through the Improvement of Sanitary and Phytosanitary Notifications" (2018), served as scenario to observe again that the items that needed greater emphasis for improvement were Item 3 (Products Covered) and Item 6 (Description of Content). In fact, during the relevant session of the aforementioned PPD, SPS stakeholders from APEC economies exchanged views on a set of best practices for the improvement of the information submitted in SPS notifications.

2. RESEARCH METHODOLOGY

This study is based on the methodology applied in the previous *Study of APEC Economies' Sanitary and Phytosanitary (SPS) Notifications on Quality and Completeness of Information* (2019). This study was part of Peru's initiative *Proposal on Promoting Transparency Through the Improvement of Sanitary and Phytosanitary Notifications*, which aimed to continue APEC's work on a set of recommendations to improve the quality and integrity of WTO SPS notifications. The objective of the study was to evaluate, using random samples, the quality and completeness of the information provided by APEC economies in WTO SPS notifications, in accordance with WTO guidelines.

In that sense, this follow-up study has analyzed regular and emergency notifications from APEC economies between the years 2020 and 2024, in order to understand how the notifications have evolved after the 2019 study.

2.1. WTO SPS NOTIFICATIONS

2.1.1. REGULAR SPS NOTIFICATIONS

Considering that the number of WTO Regular SPS notifications between 2020 and 2024 have been 1,974, a total of 498 notifications will be randomly selected for the follow-up study representative sample which provides 99% confidence level. This sample will be distributed proportionally, based on the percentage of notifications from each APEC economy during the aforementioned period.

Regular SPS notifications will be evaluated with the questionnaire developed in Annex 1. The purpose of this tool is to evaluate if the information completed by the APEC economies in the items of “Products covered” and “Description of content” in SPS notifications is consigned in accordance with the recommendations of Annex A-1: Regular Notifications from document G/SPS/7/Rev.5.

For this follow-up study, addendum, corrigendum and revisions of regular SPS notifications will be excluded, as the focus will be on the key items yet to be assessed in line with the recommendations from the previous initiative.

2.1.2. EMERGENCY SPS NOTIFICATIONS

On the other hand, as the number of WTO emergency SPS notifications between 2020 and 2024 have been 814, a total of 367 of them will be randomly selected in order to construct the sample with 99% confidence. This sample, again, will be distributed proportionally, based on the percentage of notifications from each APEC economy during the aforementioned period.

Emergency SPS notifications will be evaluated using the questionnaire developed in Annex 2. The purpose of this tool is to evaluate if the information completed by the APEC economies in the items of “Products covered” and “Description of content” within WTO emergency SPS notifications is consigned in accordance with the recommendations of Annex B-1: Emergency Notifications from document G/SPS/7/Rev.5.

As in the case of regular SPS notifications, addendum, corrigendum and revisions of emergency SPS notifications will be excluded.

Table 1. Process of the determination of sample size

	Regular notification	Emergency notifications
Confidence level	99%	99%
Confidence interval	5%	5%
Population size	1,974	814
Sample size	498	367

2.2. PRIVATE SECTOR EXPERIENCES

Private sector experiences in SPS notifications have been evaluated using the questionnaire developed in Annex 3.

ABAC Peru circulated and disseminated the private sector questionnaires among ABAC members. Also, private sector responses were received through the dissemination of some APEC economies.

In total, 42 questionnaires of private sector from 15 APEC economies were considered for this follow-up study.

2.3. OBJECTIVE OF THE STUDY

This study is part of Peru’s Follow-up initiative on *Promoting Transparency through the Improvement of Information submitted in the Sanitary and Phytosanitary (SPS) Notifications (CTI_202_2024T)*. In that sense, this self-funded follow-up study aims to evaluate how the information provided by APEC Members in SPS notifications have

evolved since the previous *Study of APEC Economies' Sanitary and Phytosanitary (SPS) Notifications on Quality and Completeness of Information (2019)*, in accordance with the latest version of *WTO Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement (Article 7)(2023)*.

It seeks to raise awareness and enhance the understanding of:

1. The current situation of the information provided by APEC economies in their WTO SPS Notifications, specifically on the two key items.
2. The level of compatibility of key items within SPS notifications with the *WTO Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement (Article 7)*.
3. Private sector perception of key items within SPS notifications and main challenges related to the quality and completeness of the information.
4. Best practices and capacity-building opportunities to assist APEC Members in improving the quality and completeness of their WTO SPS notifications, within the scope of the current SPS Agreement and its Recommendations.

Since the 2019 APEC study identified sections in the regular and emergency notifications of APEC economies that require improvement, this follow-up study seeks to retake a targeted review of these sections; therefore, the following objectives will be addressed:

Objective 1: To determine the level of compatibility of specific sections in APEC economies regular SPS notifications with the recommended procedures for implementing the transparency obligations under the WTO SPS Agreement.

- Section 3: Products Covered
- Section 6: Description of Content

Objective 2: Determine the level of compatibility of specific sections in APEC economies SPS emergency notifications with the recommended procedures for implementing the transparency obligations established in the WTO SPS Agreement.

- Section 3: Products covered
- Section 6: Description of content

Objective 3: Compare the results obtained in the follow-up with those obtained in the previous study and identify the types of information and sections in APEC economies regular and emergency notifications that could be improved in the short term.

2.4. SCOPE OF THE STUDY

This follow-up study is based on the methodology applied in the previous *Study of APEC Economies' Sanitary and Phytosanitary (SPS) Notifications on Quality and Completeness of Information (2019)*. This study was part of Peru's initiative *Proposal on Promoting Transparency Through the Improvement of Sanitary and Phytosanitary Notifications*, which aimed to continue working on a set of recommendations to improve the quality and integrity of WTO SPS notifications made by APEC economies. The aim of this follow-

up study is to evaluate, using random samples, the quality and completeness of the information provided by APEC economies in WTO SPS notifications between 2020 and 2024, in accordance with current WTO guidelines.

All SPS notifications are public on the ePing SPS&TBT platform.

3. RESULTS OF NOTIFICATIONS' ANALYSIS

3.1. REGULAR NOTIFICATIONS

The following subheadings reflect the information required within the formats to submit a notification to the WTO (Annex A-1, G/SPS/7/Rev.5).

3.1.1. ITEM 3: PRODUCTS COVERED

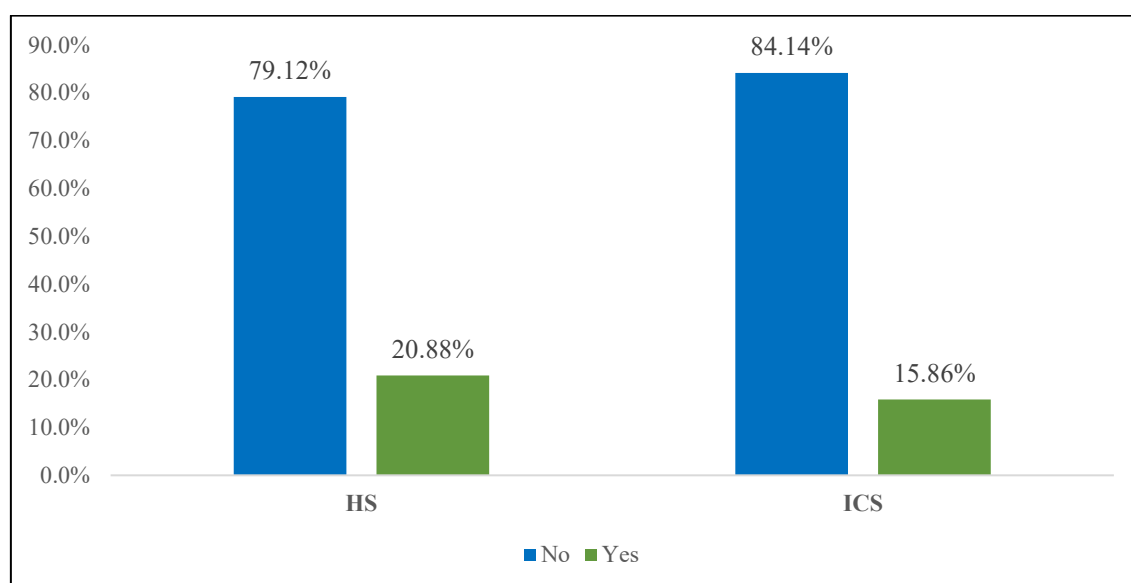
The WTO notification format recommends that Members should provide the following information regarding the products covered in regular notifications:

“Tariff item number(s) (normally HS, chapter or heading and number) as contained in national schedules deposited with the WTO. ICS [International Classification of Standards] numbers should be provided in addition, where applicable. A clear description is important for an understanding of the notification by delegations and translators. Abbreviations should be avoided.”
(WTO, 2023, Annex A-1)

In this study, only 20.88% of APEC economies SPS regular notifications include the tariff item number (also known as the tariff line or HS code), while 15.86% provide the International Classification of Standards (ICS) number (see Figure 1).

At least, it is possible to determine that about 36.75% of the sample have included either HS code or ICS number in SPS regular notifications. Overall, these findings indicate that APEC economies are on moving forward to aligning with WTO practices.

Figure 1. Comparative between the inclusion of HS and ICS in Sampled APEC SPS regular notifications



Regarding the recommendation to include product descriptions, 97.39% include a description of the products covered by the measure (see Figure 2). About the description of the products that was included in SPS regular notifications, 57.11% clearly specify the covered product (see Figure 3), and most including both the product's common name and its scientific name.

It is important to highlight that abbreviations appear in only 1.24% of all SPS regular notifications.

Figure 2. Inclusion of a description of the products covered in Sampled APEC SPS regular notifications

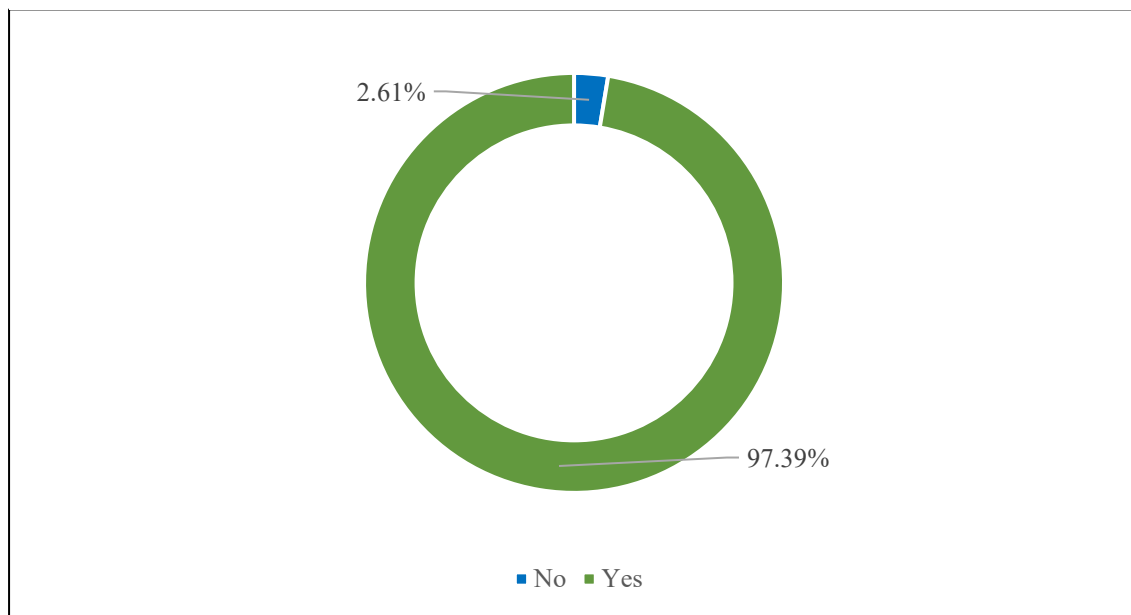
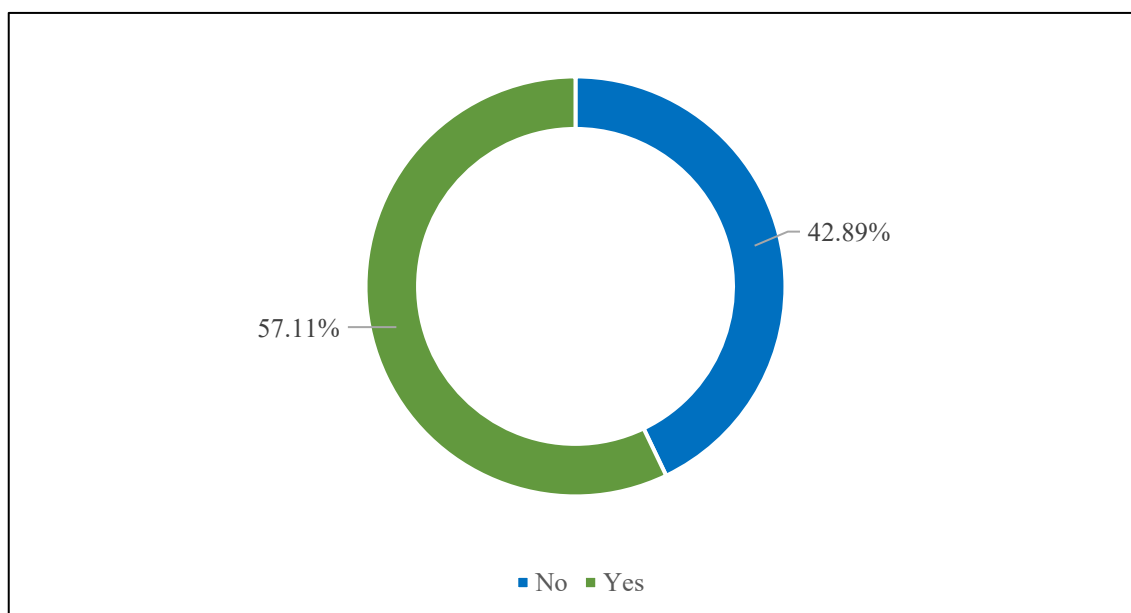


Figure 3. Clearness of Provided Product Descriptions in Sampled APEC SPS regular notifications



Overall, considering the key elements required under the item 3 – Products Covered, *the inclusion of tariff numbers, product descriptions, and the clarity of those descriptions*, APEC economies, on average, achieve a 58.45% compatibility rate with the recommended information for item 3 (see Table 2).

Table 2. Evaluation of Item 3 of SPS regular notifications

Elements required within the item	Level of compatibility	Average weight	Total
Tariff item number(s) (HS) mentioned	20.88%	33.33%	6.96%
Description of the products	97.39%	33.33%	32.46%
Clearness of description	57.11%	33.33%	19.03%
Evaluation of Item 3			58.45%

Based on these findings, this follow-up study identifies that APEC SPS regular notifications could be improved by including the Tariff item number(s) or HS code, and also, where applicable, the ICS number, for a better identification of the products covered in SPS measures.

As the 2019 APEC study highlighted, some descriptions do not necessarily refer to a particular product or groups of products determined under an HS code. Using the example of the 2019 APEC study (p. 11), regarding proposed maximum residue limits (MRLs) of certain pesticides, the impact is directly to plant products but the measure is regarding the active substance. In that sense, it could be even challenging to specific the products covered in a SPS notification.

Even though it is observed that the SPS regular notifications do include a description of the products, improvements are still needed to enhance clearness for better understanding.

3.1.2. ITEM 6: DESCRIPTION OF CONTENT

The WTO notification format recommends that Members should provide the following information regarding the description of content in regular notifications:

“A summary of the proposed or adopted (in the case of late submissions) sanitary or phytosanitary regulation clearly indicating its content and health protection objective. The summary should be as complete and accurate as possible to allow the full understanding of the proposed regulation.

To the extent possible, likely effects on trade should be described. Abbreviations should be avoided. Where practicable it should also include an outline of the specific sanitary measures the regulation will apply. The summary should enable trading partners to determine whether the notified measure is likely to have an impact on products they wish to export to the notifying Member.

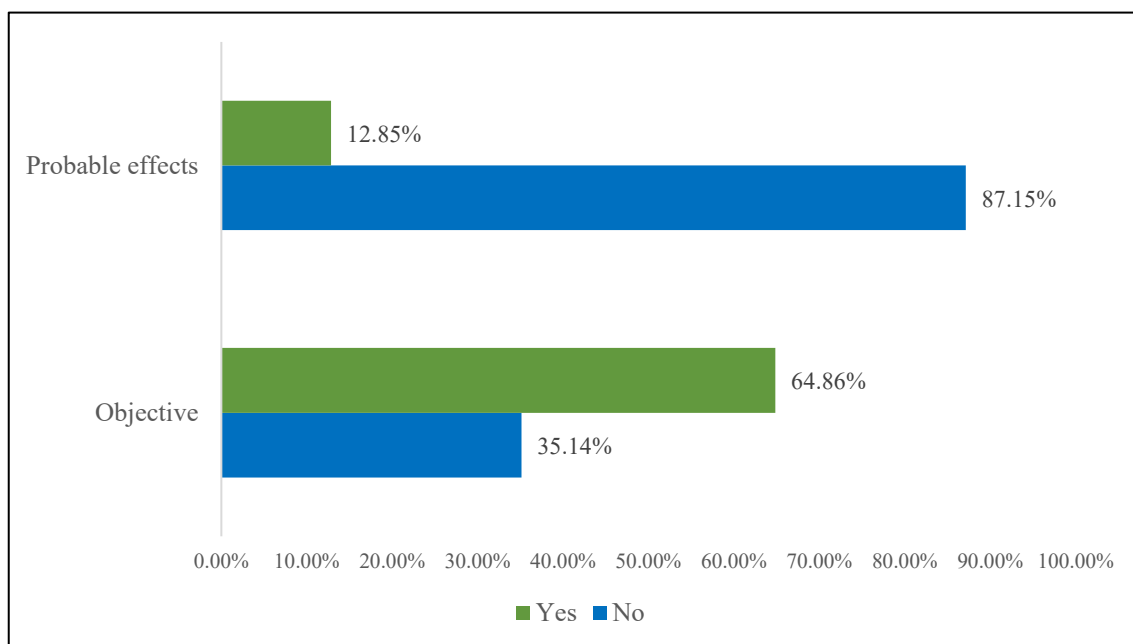
When a regulation contains both SPS and TBT measures, it should be notified according to both the SPS and TBT Agreements, preferably with an indication of which parts of the regulation fall under the SPS Agreement and which parts fall under the TBT Agreement.” (WTO, 2023, Annex A-1)

The information in this section is critical when APEC members notify, since it includes summary information on the objective of the measure, its potential impact on trade, and its most specific measures. Insufficient or very general information can raise difficulties in understanding the scope of the notified measure. The description of the content is still part of the items where APEC economies have the opportunity to continue improving substantially.

The results indicate that only 12.85% of notifications show the probable effects (see Figure 4). Although, about 64.86% of sampled SPS regular notifications specify the objective of the proposed regulations (see Figure 4).

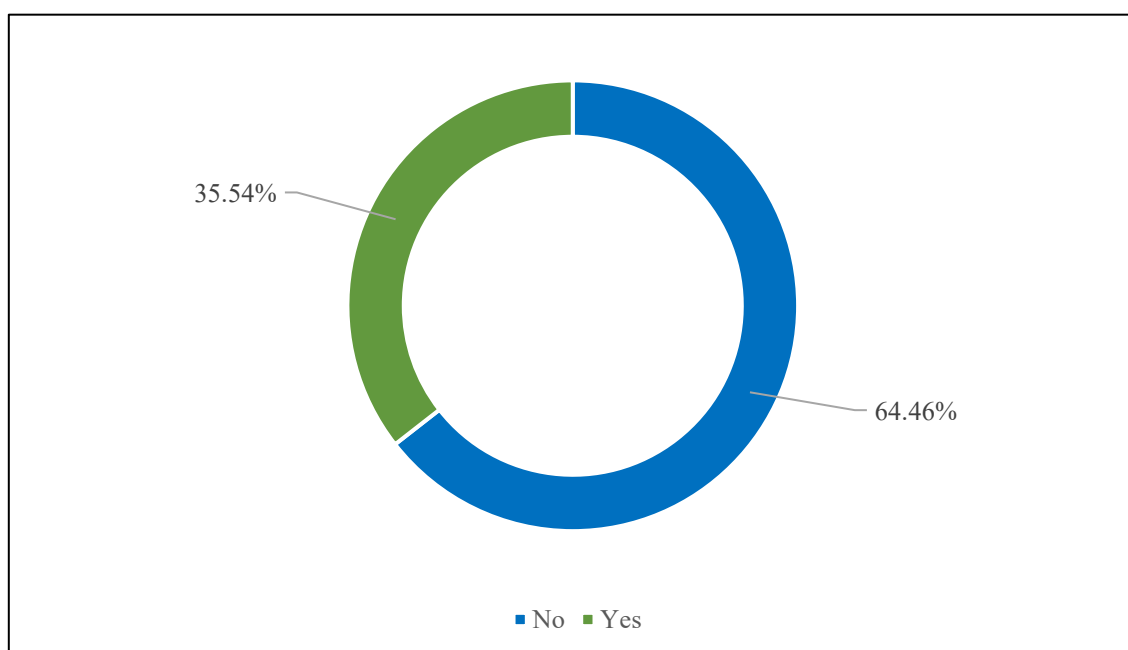
It's important to mention that 11.85% of all SPS regular notifications included in Item 6 contains abbreviations.

Figure 4. Inclusion of the objective, and probable effects on trade of Sampled APEC SPS regular notifications



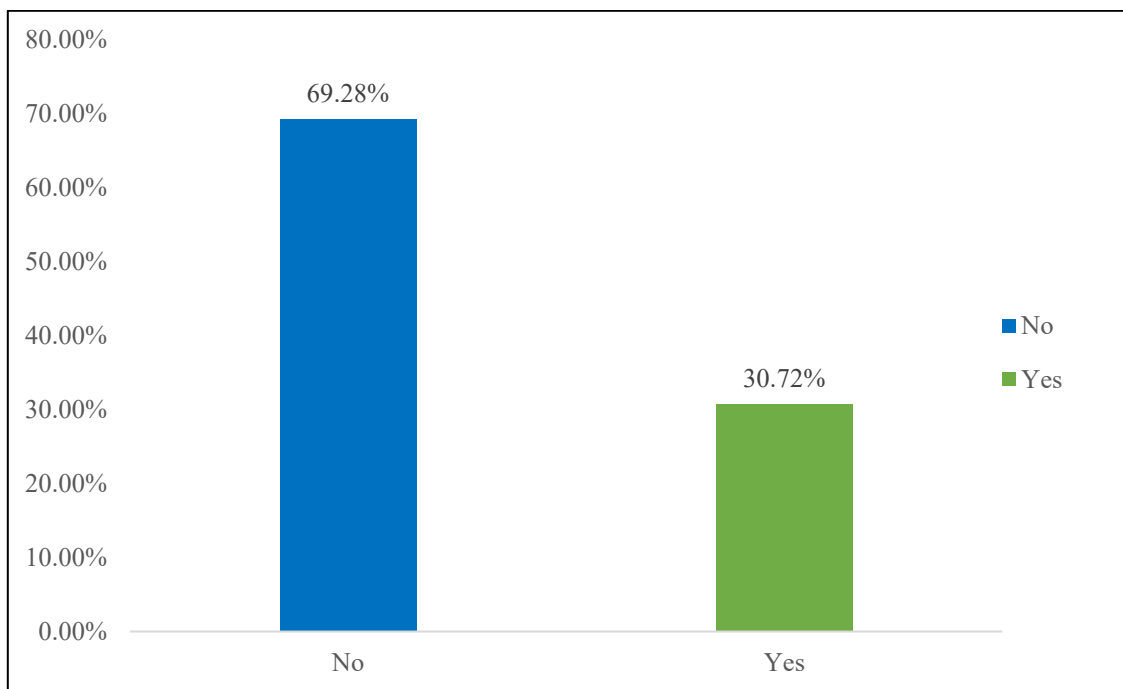
In addition, only 35.54% described an outline of the specific SPS measures in which the regulation applies (see Figure 5). This reflects that APEC economies could describe the outline of the measures in a more exhaustive way.

Figure 5. Sampled APEC SPS regular notifications with Application Outline of the Regulation



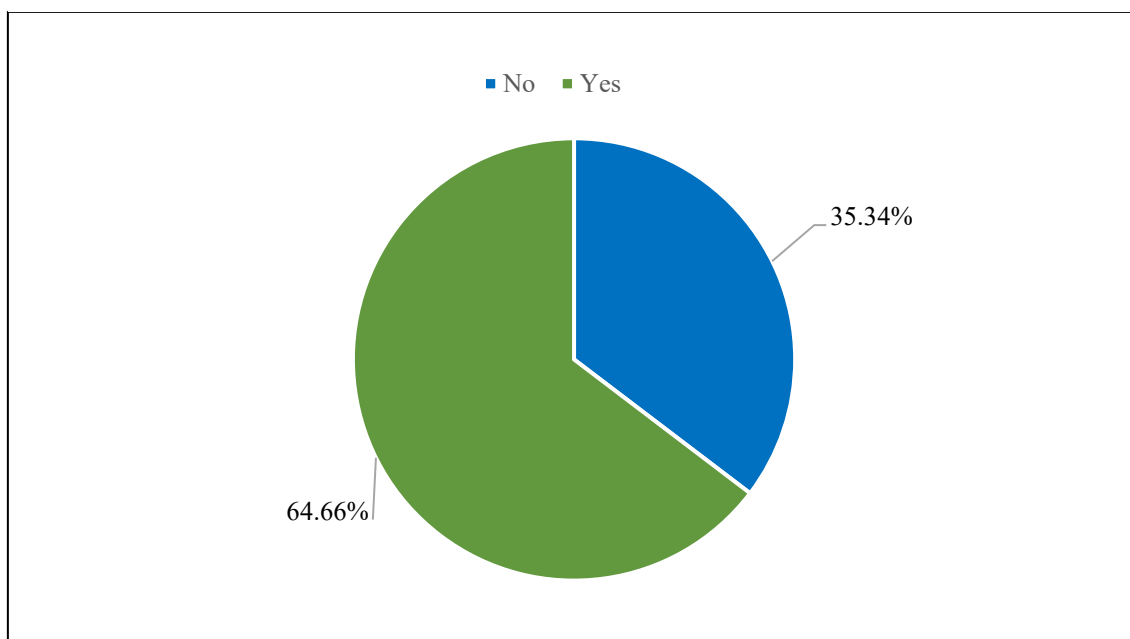
On the other hand, the results show that in 30.72% of cases, it has been possible to identify the effects on exports (see Figure 6).

Figure 6. Sampled APEC SPS regular notifications with the effects on exports identified



It should be noted that 64.66% of the sampled notifications present clearness in the section “description of content” (see Figure 7).

Figure 7. Understanding of the proposed measure in Sampled APEC SPS regular notifications



In that sense, considering the key elements required under the item 6 – Description of Content, *Objective of the regulation*, *Description of effects on trade*, *Outline of the SPS*

measure, *Impact on exports and Understanding of the proposed measure*, APEC economies, on average, achieve a 41.73% compatibility rate with the recommended information for item 6 (see Table 3).

Table 3. Evaluation of Item 6 of SPS regular notifications

Elements required within the item	Level of compatibility	Average weight	Total
Objective of the regulation	64.86%	20.00%	12.97%
Description of effects on trade	12.85%	20.00%	2.57%
Outline of the SPS measure	35.54%	20.00%	7.11%
Impact on exports	30.72%	20.00%	6.14%
Understanding of the proposed measure	64.66%	20.00%	12.93%
Evaluation of Item 6			41.73%

Based on these results, this follow-up study recommends that APEC notifications should be improved by including a more detailed and explicit description of the possible trade and exports effects of the measure. Moreover, they could also describe the outline of the measures more comprehensively.

3.1.3. REGULAR NOTIFICATIONS RESULTS

The evaluation of the SPS regular notifications, presented in Table 4, shows an overall result of 50.09%, indicating a moderate level of compatibility with WTO recommendations.

Table 4. General evaluation of WTO recommendations in Item 3 and 6 of SPS regular notifications from APEC economies

Item	Description	Compatibility with WTO Recommendations
3	Products Covered	58.45%
6	Description of Content	41.73%
AVERAGE		50.09%

3.2. EMERGENCY NOTIFICATIONS

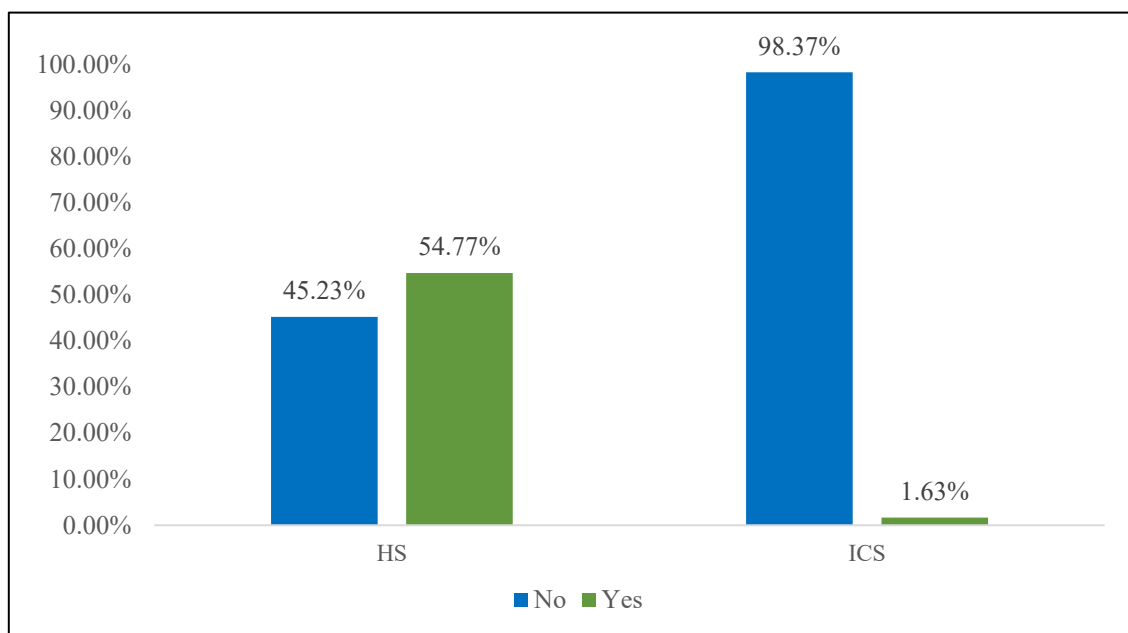
3.2.1. ITEM 3: PRODUCTS COVERED

The WTO notification format recommends that Members should provide the following information regarding the products covered in emergency notifications:

“Tariff item number(s) (normally HS, chapter or heading and number) as contained in national schedules deposited with the WTO. ICS [International Classification of Standards] numbers should be provided in addition, where applicable. A clear description is important for an understanding of the notification by delegations and translators. Abbreviations should be avoided.” (WTO, 2023, Annex B-1).

The results in this section for SPS emergency notifications are interpreted as better than the results for regular notifications, since they show that 54.77% of notifications include the tariff line of the product concerned (see Figure 8). On the other hand, only 1.63% of APEC members provided the International Classification of Standards (ICS) number, which is even lower than the SPS regular notifications.

Figure 8. Comparative between the inclusion of HS and ICS in Sampled APEC SPS emergency notifications



Regarding the recommendation to include product descriptions, 99.18% include a description of the products covered by the emergency measure (see Figure 9). About the description of the products that was included in SPS emergency notifications, 59.07% were considered as "clear" (see Figure 10).

It is important to highlight that abbreviations appear in only 1.09% of all SPS emergency notifications.

Figure 9. Inclusion of a description of the products covered in Sampled APEC SPS Emergency Notifications

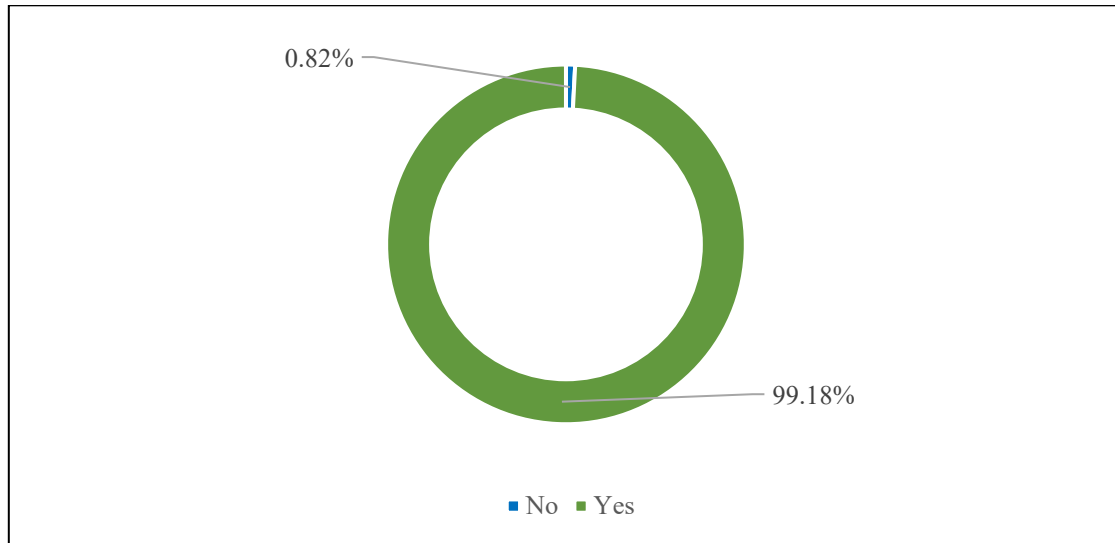
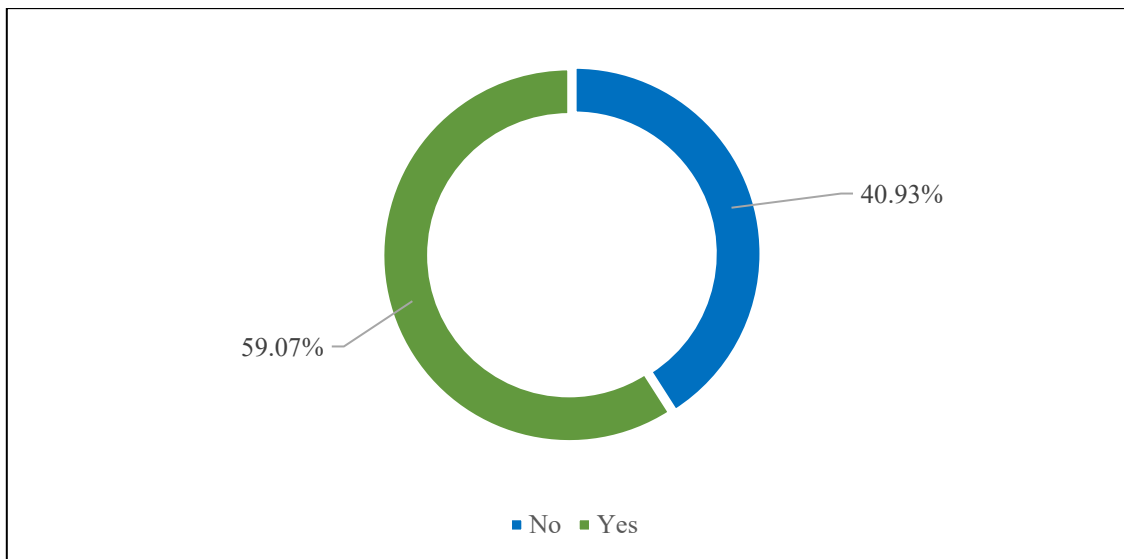


Figure 10. Clearness of Provided Product Descriptions in Sampled APEC SPS Emergency Notifications



With the aforementioned results and considering the key elements required under the item 3 – Product Covered, *Tariff item number(s) (HS) mentioned, Description of the products, and Clearness of description*, APEC economies, on average, achieve a 71.00% compatibility rate with the recommended information for item 3 (see Table 5).

Table 5. Evaluation of Item 3 of SPS Emergency Notifications

Elements required within the item	Level of compatibility	Average weight	Total
Tariff item number(s) (HS) mentioned	54.77%	33.33%	18.25%
Description of the products	99.18%	33.33%	33.06%

Clearness of description	59.07%	33.33%	19.69%
Evaluation of item 3			71.00%

This situation is quite similar to SPS regular notifications, as APEC economies generally comply with including a description of the affected products in their notifications. However, improvements are needed in terms of the clearness of these descriptions made and the inclusion of a tariff number.

3.2.2.ITEM 6: DESCRIPTION OF CONTENT

Regarding the recommendations for this item, as previously mentioned, WTO states:

“A summary of the proposed or adopted (in the case of late submissions) sanitary or phytosanitary regulation clearly indicating its content and health protection objective. The summary should be as complete and accurate as possible to allow the full understanding of the proposed regulation.

To the extent possible, likely effects on trade should be described. Abbreviations should be avoided. Where practicable it should also include an outline of the specific sanitary measures the regulation will apply. The summary should enable trading partners to determine whether the notified measure is likely to have an impact on products they wish to export to the notifying Member.

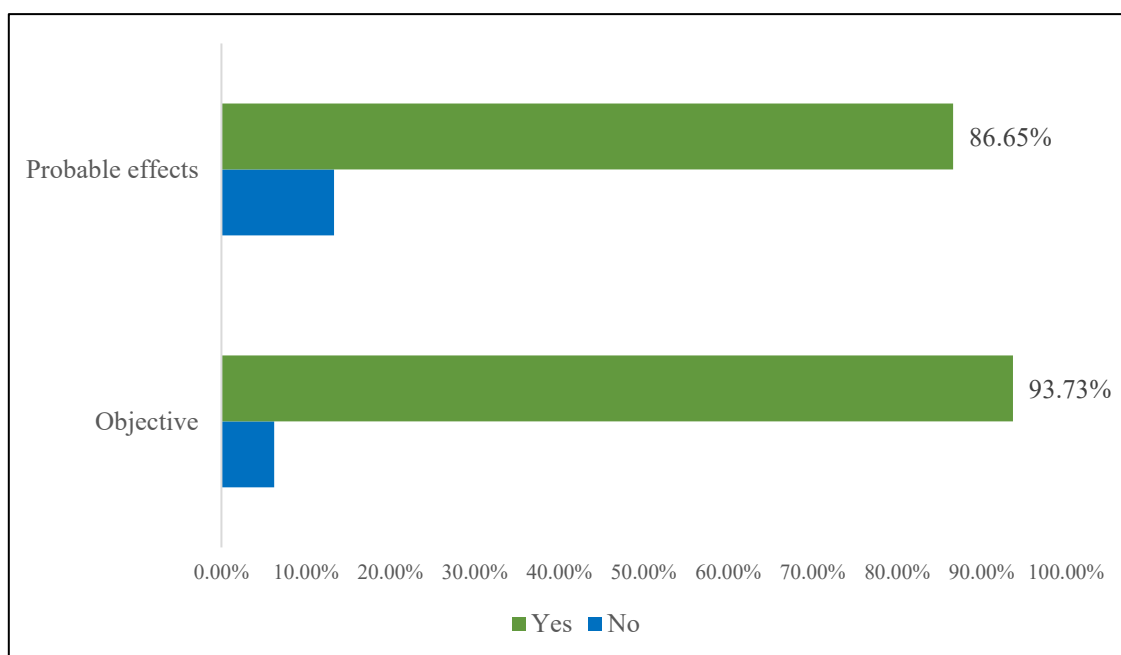
When a regulation contains both SPS and TBT measures, it should be notified according to both the SPS and TBT Agreements, preferably with an indication of which parts of the regulation fall under the SPS Agreement and which parts fall under the TBT Agreement.”

The information in this section is critical when APEC members notify, insufficient or very general information can raise difficulties in understanding the scope of the notified emergency measure.

The results of the study reflect that 86.65% of SPS emergency notifications show the probable effects. While 93.73% of those notifications include the objective of the proposed emergency measures (see Figure 11).

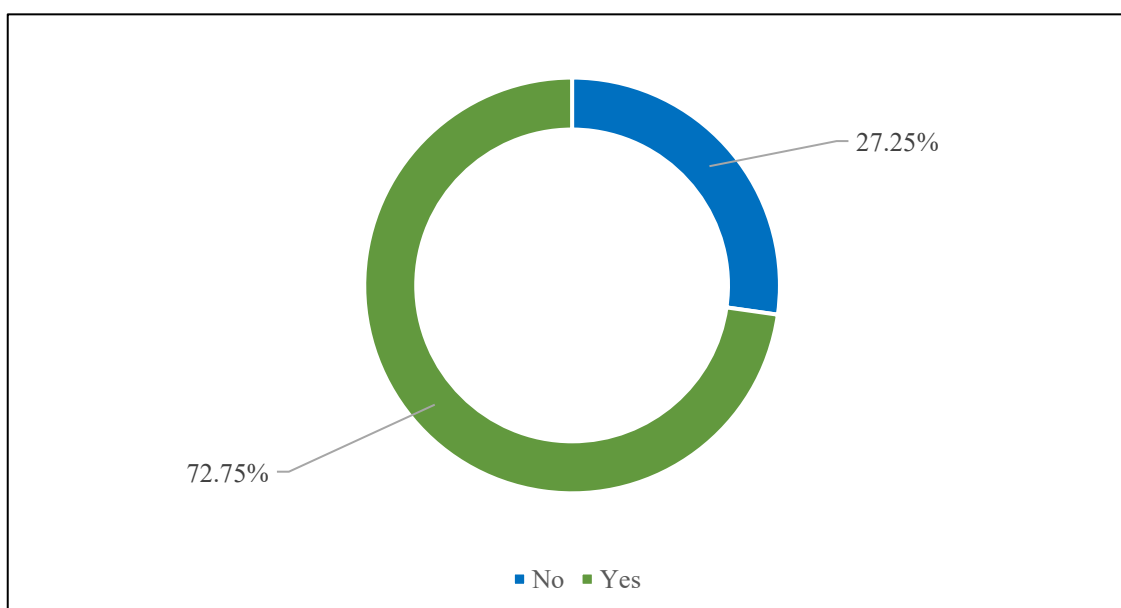
It's important to mention that the abbreviations are included in 62.40% of all SPS emergency notifications studied, which is really high compared to the results of SPS regular notifications.

Figure 11. Inclusion of the objective, and probable effects on trade of Sampled APEC SPS Emergency Notifications



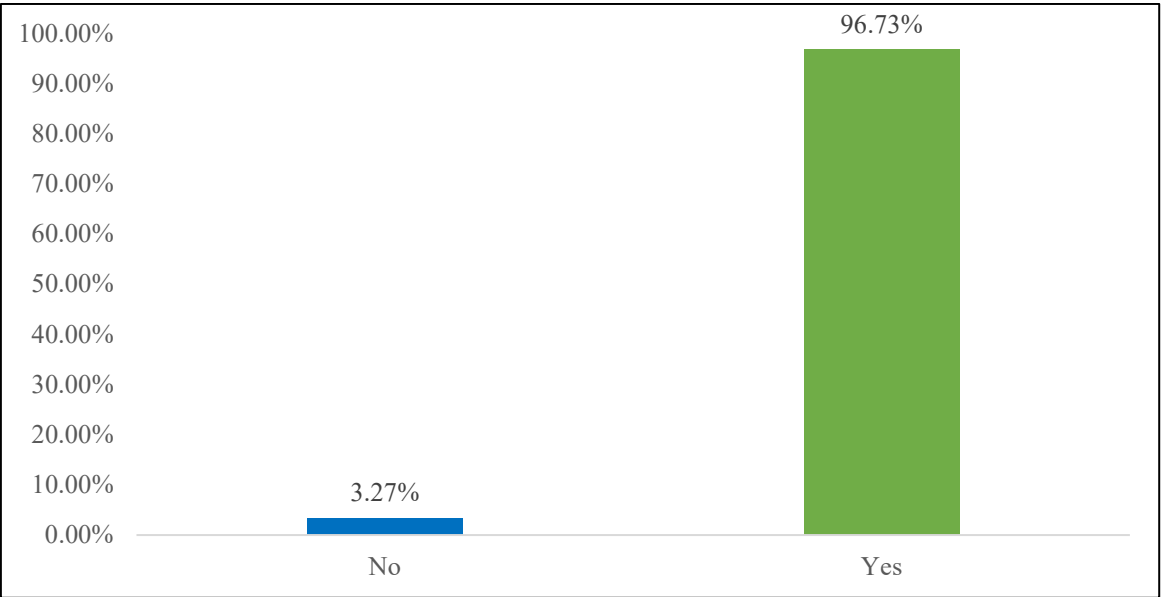
In addition, about 72.75% described an outline of the specific SPS measures in which the regulation applies (see Figure 12). This demonstrates that APEC economies are already describing the outline of the emergency measures in a more comprehensive way.

Figure 12. Sampled APEC SPS Emergency Notifications with Application Outline of the Regulation



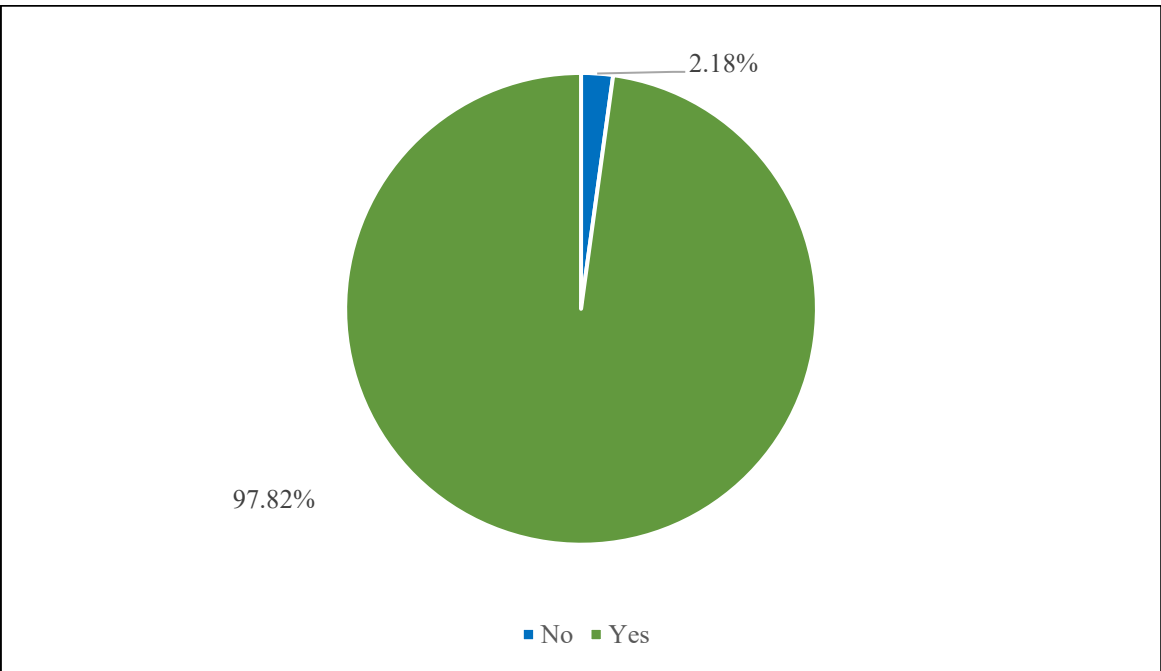
The results of the study show that in 96.73% of cases, it has been possible to identify the effects on exports in SPS emergency notifications (see Figure 13).

Figure 13. Sampled APEC SPS Notifications with the effects on exports identified



It should be noted that 97.82% of the sampled notifications present clearness in the section “description of content” (see Figure 14). It is important to highlight that the performance from APEC economies in this item in SPS emergency notifications is better than the one in regular notifications.

Figure 14. Understanding of the proposed measure in Sampled APEC SPS Notification



The following table shows the assessment of compliance for this item, and it shows that APEC economies are only aligned, on average 89.54% with the WTO recommendations.

Table 6. Evaluation of Item 6 of SPS Emergency Notifications

Elements required within the item	Level of accomplishment	Average weight	Total
Objective of the regulation	93.73%	20.00%	18.75%
Description of effects on trade	86.65%	20.00%	17.33%
Outline of the SPS measure	72.75%	20.00%	14.55%
Impact on exports	96.73%	20.00%	19.35%
Understanding of the proposed measure	97.82%	20.00%	19.56%
Evaluation of item 6			89.54%

3.2.3. EMERGENCY NOTIFICATIONS RESULTS

The evaluation of the emergency notifications, presented in Table 7, shows an overall result of 80.27%, indicating a high level of compatibility with WTO recommendations.

Table 7. General evaluation of WTO recommendations in Item 3 and 6 of SPS emergency notifications from APEC economies

Item	Description	Compatibility with WTO recommendations
3	PRODUCTS COVERED	71.00%
6	DESCRIPTION OF CONTENT	89.54%
AVERAGE		80.27%

4. CONTRAST AND IDENTIFICATION OF SECTIONS FOR IMPROVEMENT

Regarding the evolution of SPS notifications and the level of compatibility with WTO recommendations, a comparison was made between the results of the study of the previous period (2014-2017) and those of the current period (2020-2024). To do so, the variation in compatibility was analyzed through the calculation of the absolute improvement, expressed in percentage points (pp), defined as the direct difference between the percentage achieved in the current period and that obtained in the previous study. In this way, it is possible to clearly identify which elements of both items, Products covered and Description of content, have shown concrete progress in the implementation of the recommendations, and which continue to show challenges.

4.1. REGULAR NOTIFICATIONS

4.1.1. ITEM 3: PRODUCTS COVERED

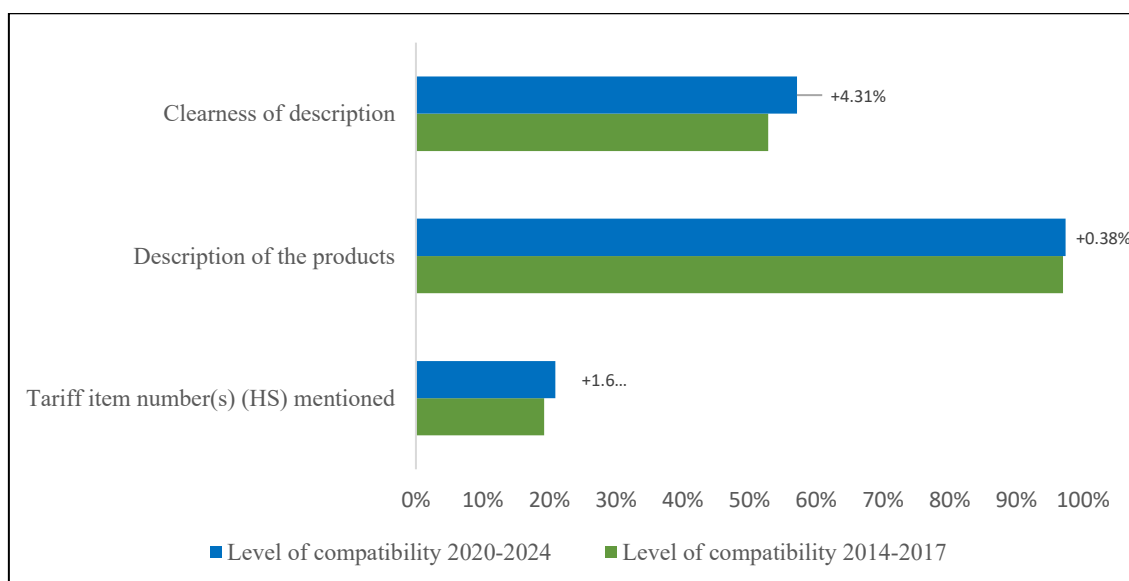
In the case of ITEM 3 - Products Covered, the analysis shows a notable improvement according to Table 8. The compatibility of tariff item numbers (HS) increased by 1.66 percentage points, rising from 19.22% in 2014-2017 to 20.88% in 2020-2024. The description of the products improved slightly by 0.38 percentage points, from 97.01% to 97.39%, while clarity of description saw a rise of 4.31 percentage points, from 52.80% to 57.11%. Overall, the average compatibility across these elements in Item 3 of SPS regular notifications improved by 2.12 percentage points, during the period 2020-2024.

Table 8. Improvement level of Item 3 of SPS regular notifications

Elements required within the item	Level of accomplishment 2014-2017	Level of accomplishment 2020-2024	Improve
Tariff item number(s) (HS) mentioned	19.22%	20.88%	1.66%
Description of the products	97.01%	97.39%	0.38%
Clearness of description	52.80%	57.11%	4.31%
Average			2.12%

These improvements are visually represented in Figure 15, illustrates the varying degrees of improvement across the elements of Item 3 of SPS regular notifications.

Figure 15. Improvement level of Item 3 of SPS regular notifications



4.1.2. ITEM 6: DESCRIPTION OF CONTENT

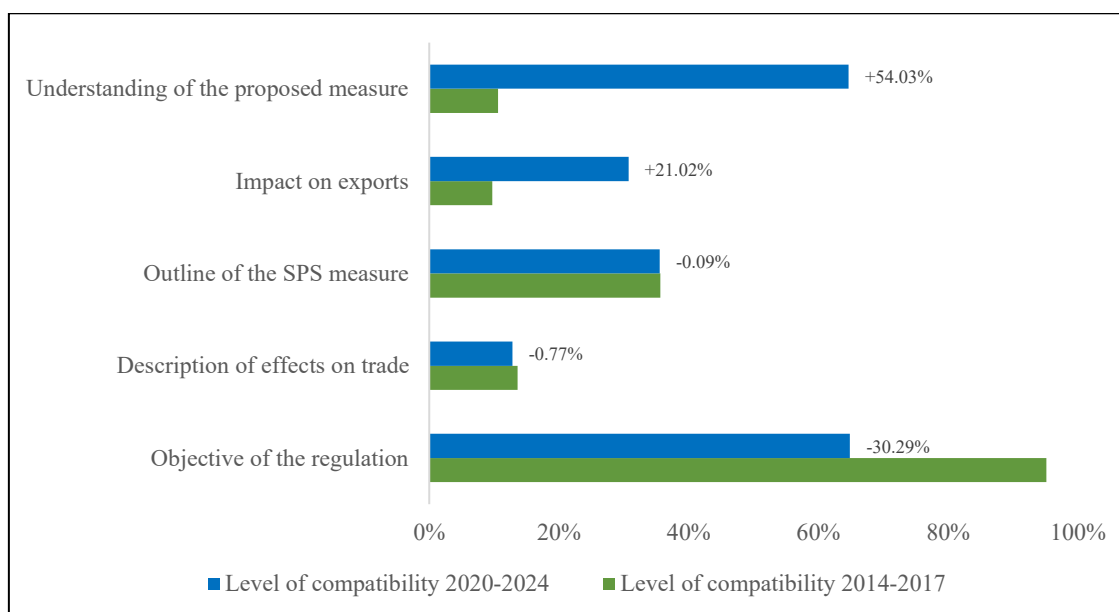
In the case of ITEM 6 - Description of the Content, Table 9 highlights a mixed evolution in the level of compatibility with the required elements. The objective of the regulation decreased significantly by 30.29 percentage points, dropping from 95.15% in 2014-2017 to 64.86% in 2020-2024. The description of effects on trade also declined by 0.77 percentage points, from 13.62% to 12.85%. Similarly, the outline of the SPS measure saw a slight decrease of 0.09 percentage points, from 35.63% to 35.54%. Conversely, the impact on exports improved notably by 21.02 percentage points, rising from 9.70% to 30.72%. Lastly, understanding of the proposed measure increased substantially by 54.03 percentage points, from 10.63% to 64.66%. On average, the overall compatibility for Item 6 improved by 8.78 percentage points, during the period 2020-2024.

Table 9. Improvement level of Item 6 of SPS regular notifications

Elements required within the item	Level of accomplishment 2014-2017	Level of accomplishment 2020-2024	Improve
Objective of the regulation	95.15%	64.86%	-30.29%
Description of effects on trade	13.62%	12.85%	-0.77%
Outline of the SPS measure	35.63%	35.54%	-0.09%
Impact on exports	9.70%	30.72%	21.02%
Understanding of the proposed measure	10.63%	64.66%	54.03%
Average			8.78%

These trends are visually represented in Figure 16, which illustrates the varying degrees of improvement and decline across the elements of Item 6 of SPS regular notifications.

Figure 16. Improvement level of Item 6 of SPS regular notifications



4.2. EMERGENCY NOTIFICATIONS

4.2.1. ITEM 3: PRODUCTS COVERED

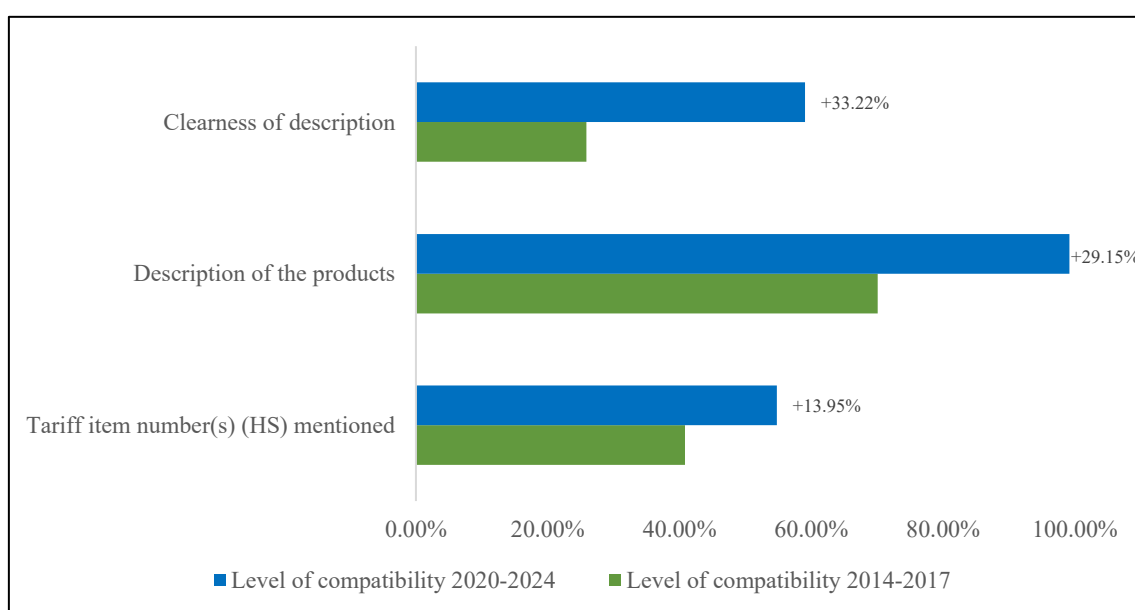
In the case of ITEM 3 - Products Covered, Table 10 indicates a significant improvement in compatibility across the required elements. The compatibility of tariff item number(s) (HS) mentioned increased by 13.95 percentage points, rising from 40.82% in 2014-2017 to 54.77% in 2020-2024. The description of the products improved by 29.11 percentage points, from 70.07% to 99.18%. Additionally, the clarity of description saw a notable rise of 33.22 percentage points, from 25.85% to 59.07%. Overall, the average compatibility for ITEM 3 improved by 25.43 percentage points, during the period 2020-2024.

Table 10. Improvement level of Item 3 of SPS Emergency Notifications

Elements required within the item	Level of accomplishment 2014-2017	Level of accomplishment 2020-2024	Improve
Tariff item number(s) (HS) mentioned	40.82%	54.77%	13.95%
Description of the products	70.07%	99.18%	29.11%
Clearness of description	25.85%	59.07%	33.22%
Average			25.43%

These improvements are visually represented in Figure 17, that illustrates the varying degrees of improvement across the elements of Item 3 of SPS emergency notifications.

Figure 17. Improvement level of Item 3 of SPS Emergency Notifications



4.2.2. ITEM 6: DESCRIPTION OF CONTENT

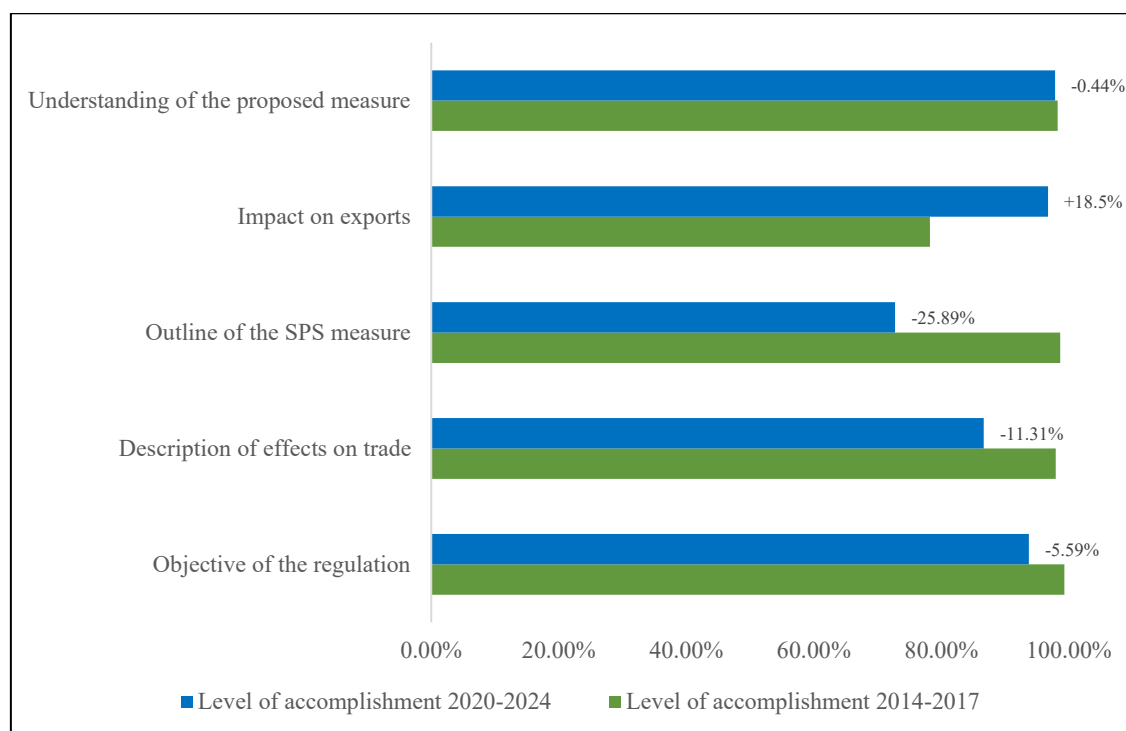
In the case of ITEM 6 - Description of the Content, Table 11 presents a mixed evolution in the level of compatibility with the required elements, some of them show progress and others experiencing variations. The objective of the regulation saw a slight decrease of 5.59 percentage points, moving from 99.32% in 2014-2017 to 93.73% in 2020-2024. The description of effects on trade declined by 11.31 percentage points, from 97.96% to 86.65%, while the outline of the SPS measure experienced a more notable reduction of 25.89 percentage points, from 98.64% to 72.75%. In contrast, the impact on exports improved by 18.50 percentage points, rising from 78.23% to 96.73%. Additionally, the understanding of the proposed measure remained strong, with a minor adjustment of 0.44 percentage points, from 98.26% to 97.82%. Overall, Item 6 reflects a net decrease of 4.95 percentage points in average compatibility, during the period 2020-2024.

Table 11. Improvement level of item 6 of SPS Emergency Notifications

Elements required within the item	Level of accomplishment 2014-2017	Level of accomplishment 2020-2024	Improve
Objective of the regulation	99.32%	93.73%	-5.59%
Description of effects on trade	97.96%	86.65%	-11.31%
Outline of the SPS measure	98.64%	72.75%	-25.89%
Impact on exports	78.23%	96.73%	18.50%
Understanding of the proposed measure	98.26%	97.82%	-0.44%
Average			-4.95%

These trends are visually represented in Figure 18, illustrates the varying degrees of improvement and decline across the elements of Item 6 of SPS emergency notifications.

Figure 18. Improvement level of item 6 of SPS Emergency Notifications



5. CONTRAST OF RESULTS AGAINST THE APEC RECOMMENDATIONS ON WTO SANITARY AND PHYTOSANITARY MEASURES NOTIFICATIONS (2019 CTI REPORT TO MINISTERS - APPENDIX 10)

APEC economies recognize the importance of the provisions on Article 7 and Annex B from WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and the Recommended Procedures for Implementing the Transparency Obligations of the SPS Agreement developed by WTO Committee on Sanitary and Phytosanitary Measures (SPS Committee).

In this regard, according to the APEC Recommendations on WTO Sanitary and Phytosanitary Measures Notifications from 2019 CTI Report to Ministers, APEC economies committed to the following actions:

“In the development of notifications, economies should strive to improve the quality and completeness of information provided in both regular and emergency notifications by including clear information in the title, descriptions of the notification content, and product(s) covered, with clear dates for comments and implementation of measures.”

Regarding the quality and completeness of information in the description of the notification content, an improvement of 8.78 percentage points was observed in regular notifications. In contrast, emergency notifications showed a decrease of 4.95 percentage points compared to the previous study period.

For clarity in the information on products covered, regular notifications improved by 2.12 percentage points, while emergency notifications show a significantly higher increase of 25.43 percentage points.

It is important to remark that the present follow-up study did not assess compliance regarding the inclusion of clear dates for public comments and implementation of measures since it is not within its scope.

“Economies are encouraged to provide a translated version of their proposed regulations in any of the WTO official working languages.”

With respect to this commitment, the present follow-up study does not include an assessment of progress related to translation. However, the SPS Committee has addressed translation challenges by establishing a working group on transparency, as recommended in the Sixth Review, which aims to explore ways to facilitate access to translations of notified SPS measures, through enhanced use of tools like the ePing SPS&TBT Platform and collaborative IT solutions.

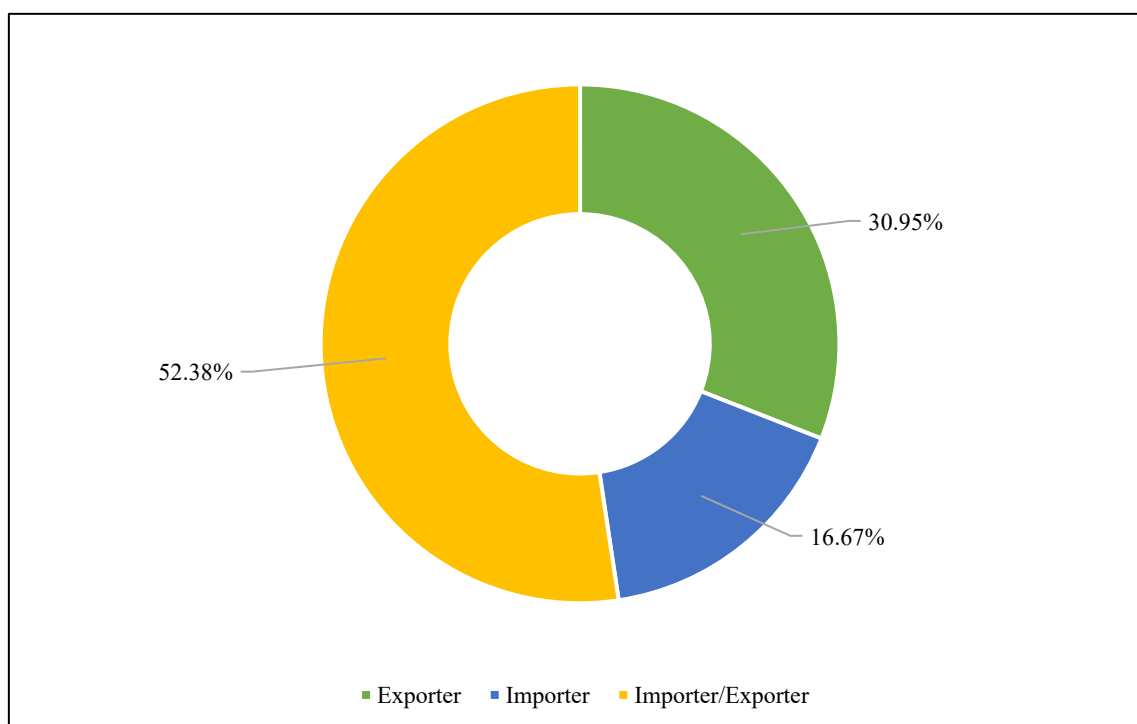
“Economies are encouraged to consider the different stakeholders, whether public or private, to generate official comments to be taken into account by a notifying economy, in accordance with the provisions established in the SPS / WTO agreement.”

Regarding this recommendation, the present follow-up study does not assess progress on stakeholder engagement in generating official comments. However, the SPS Committee, as outlined in the Sixth Review, encourages economies to involve diverse stakeholders, including public and private sectors, in submitting comments on notified SPS measures.

6. PRIVATE SECTOR EXPERIENCES

Enterprises from 15 economies filled the questionnaire. The enterprises consulted are in 52.38% of cases importers and exporters, while 30.95% are just exporters and the rest, 16.67%, importers. (See Figure 19).

Figure 19. APEC Private sector commercial condition

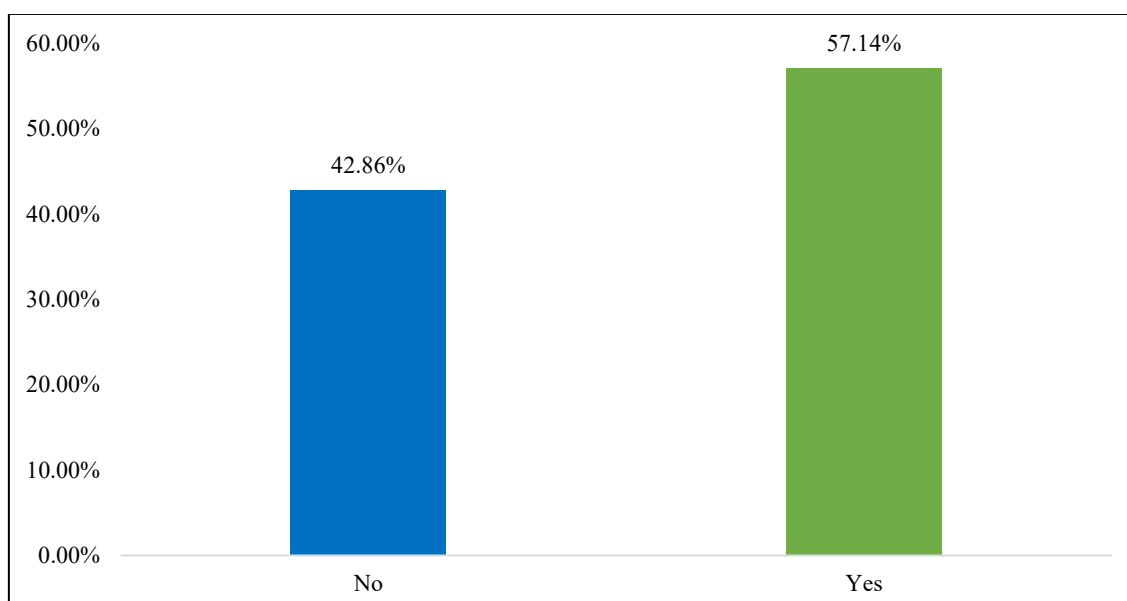


6.1. KNOWLEDGE AND USE OF WTO SPS NOTIFICATION SYSTEM

Over half of the private sector respondents (57.14%), from 15 APEC economies, know about the WTO SPS notification system, as shown in Figure 20. However, 42.86% are still unaware, highlighting a clear gap in awareness.

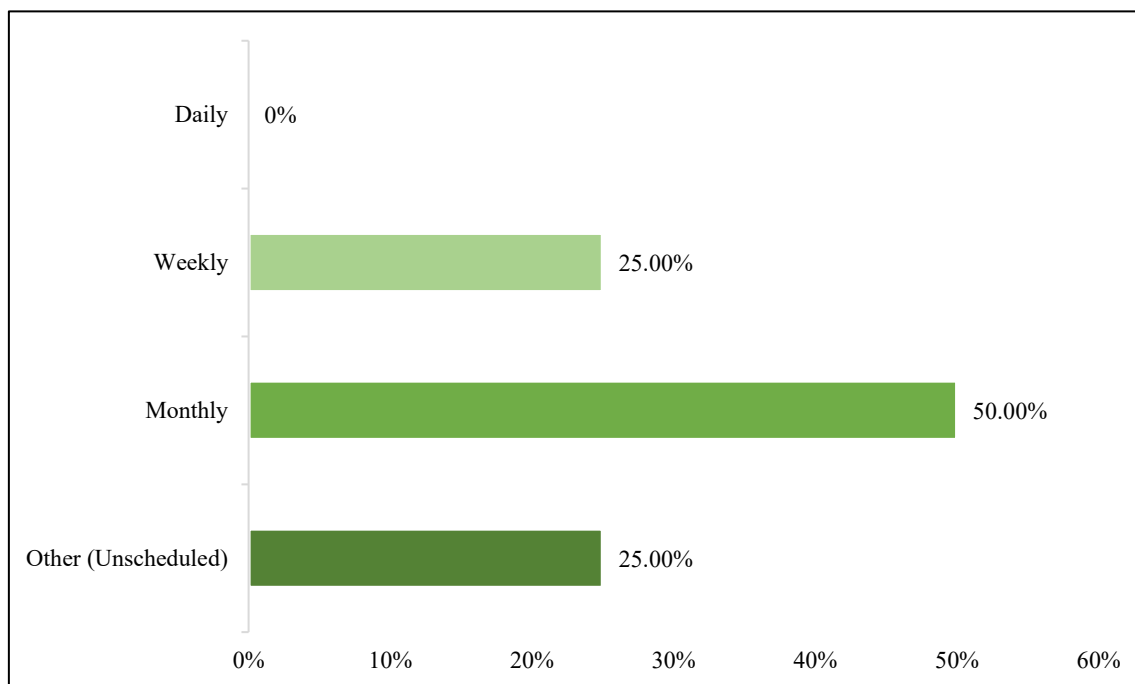
The majority of private sector respondents know about the WTO SPS notification system, and how to access WTO's SPS notifications. However, as it is shown in Figure 20, there is still 42.86% of cases where the private sector is not aware of that system.

Figure 20. APEC Private sector knowledge of WTO SPS notification system



Of the 57.14% of enterprises that are familiar with the WTO SPS notification system, in Figure 21 it could be identified from the responses that there is not a predominant frequency of consultation to the system. 50% of cases do monthly, 25% do weekly and the other 25% have the revision of SPS notifications in WTO system is unscheduled.

Figure 21. APEC Private sector use of WTO SPS notification system



6.2. SOURCE OF INFORMATION TO OBTAIN WTO SPS NOTIFICATIONS

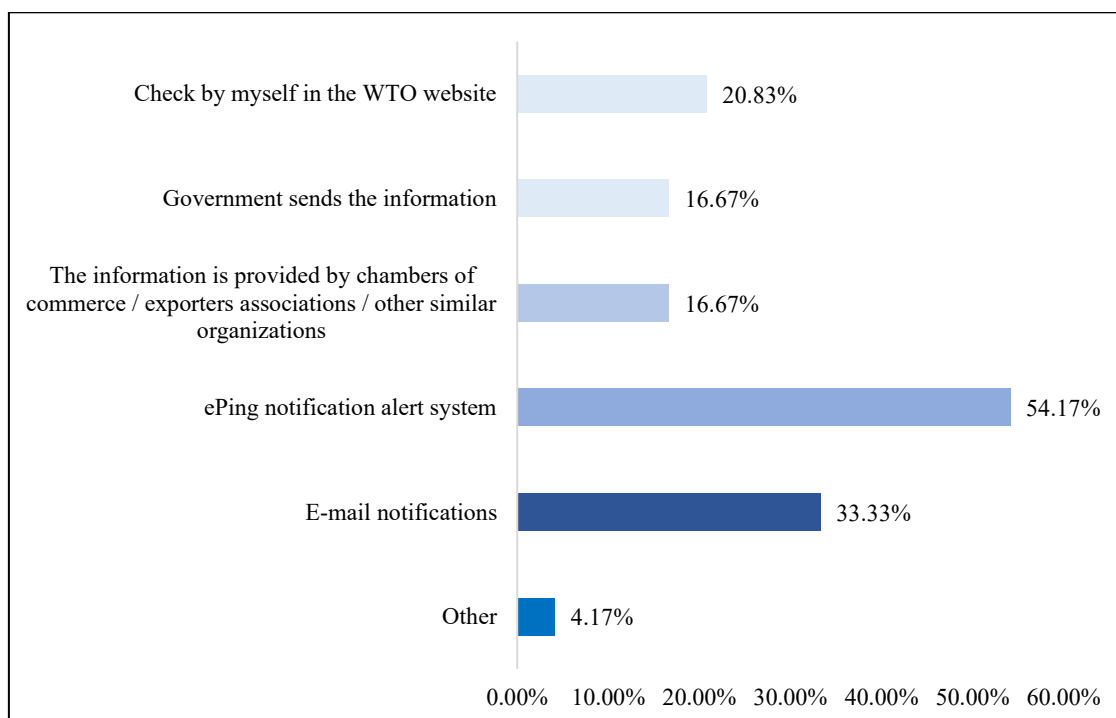
It should be noted that compared to the previous study (9.38%), 54.17% APEC private sector now prefers to use the ePing notification alert system than search for the notifications in the WTO.

In 33.33% of cases, APEC private sector receives e-mail notifications and in other 20.83% of cases they check the WTO website by themselves.

In 16.67% of cases, chambers of commerce or similar associations are strategic partners for enterprises as these associations tend to alert enterprises when there are new SPS notifications.

In 16.67% of cases, APEC private sector receives these notifications from their governmental authorities, as it is shown in Figure 22. This confirms that Governments are still playing a key role in order to disseminate WTO SPS notifications

Figure 22. APEC Private sector sources of information to obtain WTO SPS notifications

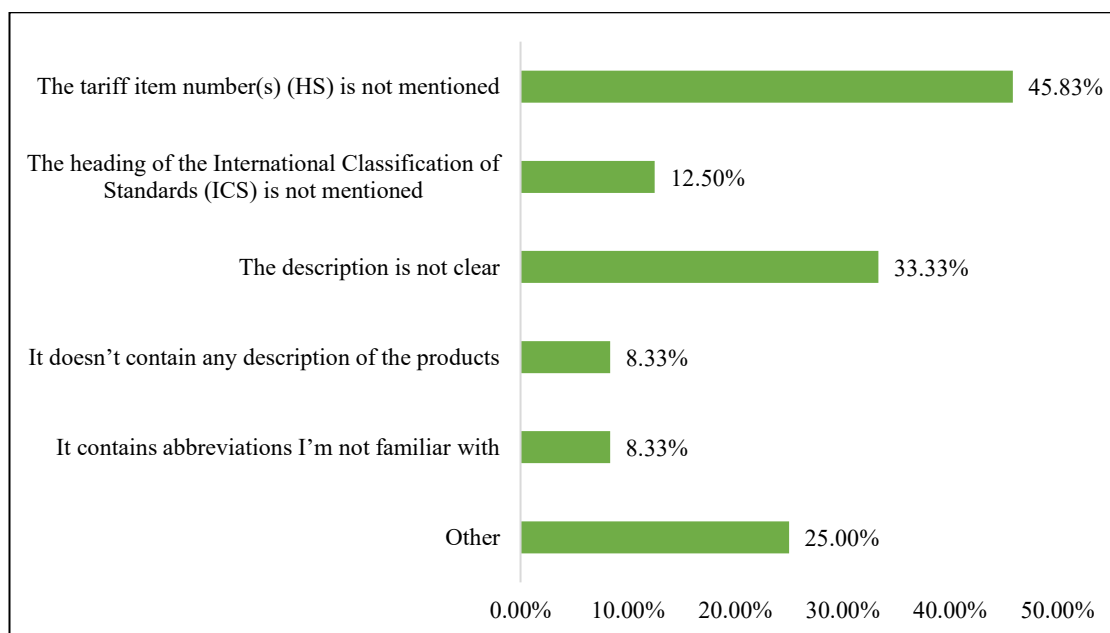


6.3. PERCEPTION OF CHALLENGES IN WTO SPS NOTIFICATIONS

6.3.1. PERCEPTION OF CHALLENGES RELATED TO THE PRODUCTS COVERED SECTION IN WTO SPS NOTIFICATIONS

From the private sector perspective, there are different challenges related to the products covered section of a SPS notification. As shown in Figure 23, with 45.83%, the most important challenge is that the tariff item number (HS) is not mentioned. Other significant challenges include an unclear description (33.33%) and the omission of the heading from the International Classification of Standards (ICS) (12.50%). Lastly, the inclusion of abbreviations and the lack of any product description each represent a challenge in 8.33% of cases.

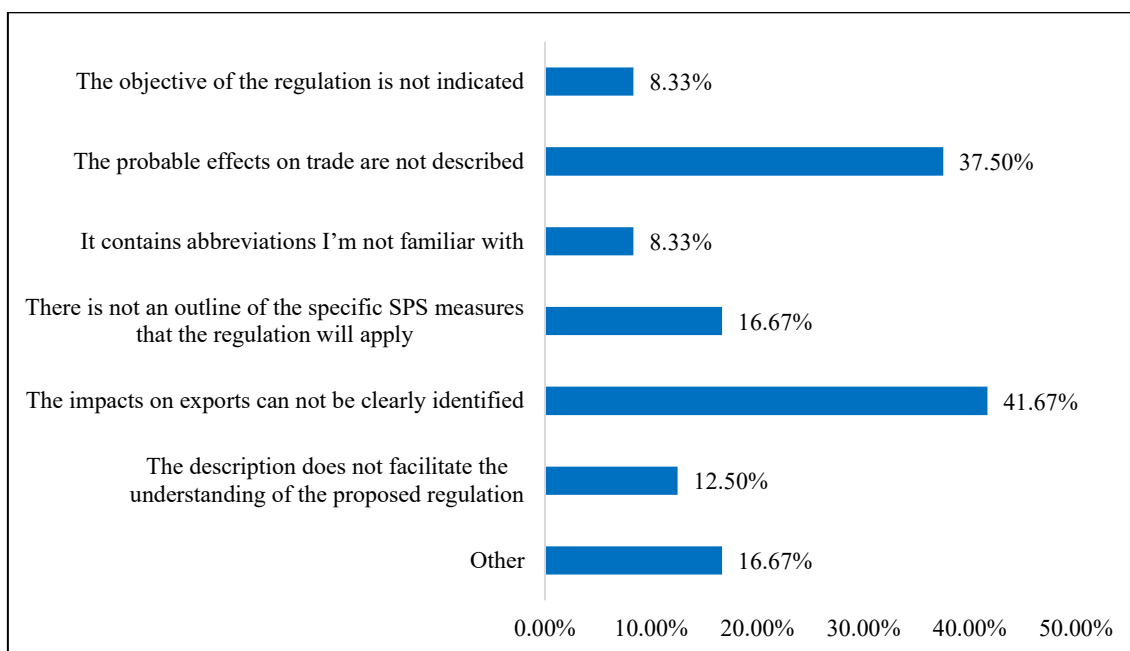
Figure 23. APEC Private sector perception of challenges in the products covered section



6.3.2. PERCEPTION OF CHALLENGES IN THE DESCRIPTION OF CONTENT SECTION IN WTO SPS NOTIFICATIONS

With 41.67%, the most reported challenge is that the impact on exports cannot be clearly identified. This challenge is followed by the probable effects on trade are not described, which represents a challenge for 37.50% of cases. Other relevant difficulties include the absence of an outline of the specific SPS measures to be applied and the presence of some issues categorized as Other, both corresponding to 16.67% of cases. On the other hand, 12.50% of cases indicated that the description does not facilitate the understanding of the proposed regulation. Less frequently reported challenges include the presence of unfamiliar abbreviations and the absence of a clear regulation's objective, both corresponding to the 8.33% of cases.

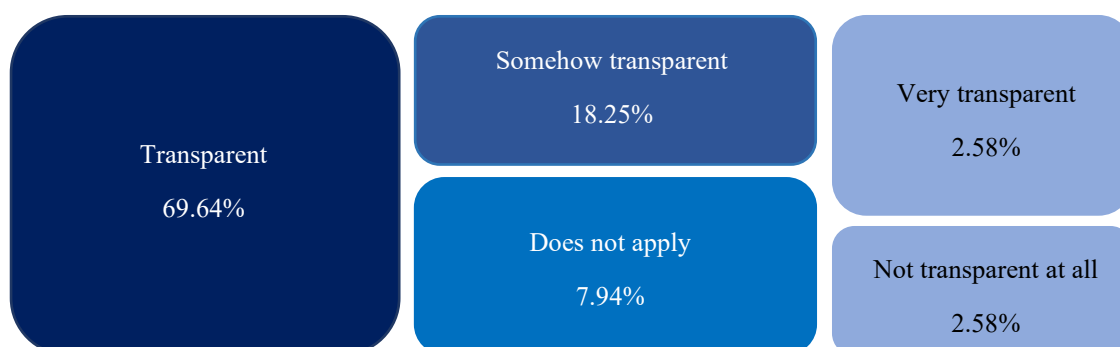
Figure 24. APEC Private sector perception of challenges in the description of content section.



6.4. TRANSPARENCY AND EFFECTIVENESS OF INFORMATION OF THE SPS NOTIFICATIONS

Regarding the level of transparency, Figure 25 shows that the private sector generally perceives the information provided as adequate. A significant majority, 69.64% of cases, indicated that the information is transparent, while only 2.58% considered it to be very transparent. However, 18.25% of cases reported that the information is somehow transparent, and 2.58% not transparent at all. These results suggest that, although transparency is largely acknowledged, there is still room for improvement in ensuring clearer and more accessible information.

Figure 25. APEC Private sector transparency and effectiveness of information

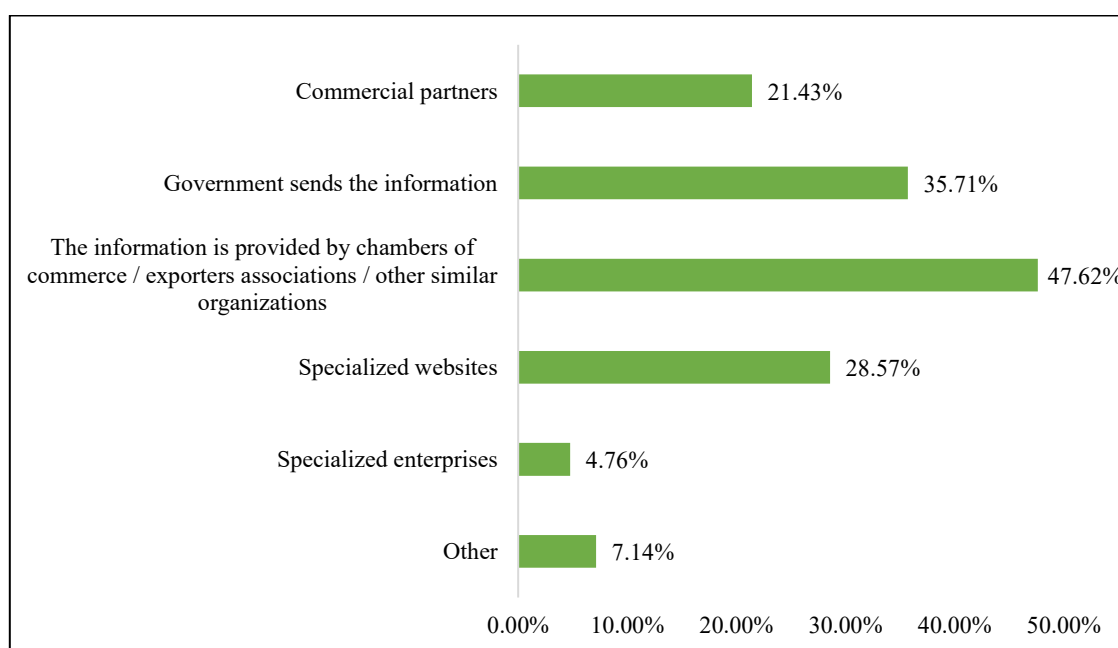


6.5. ALTERNATIVE CHANNELS OF INFORMATION FOR SPS MEASURES

Considering that 42.86% of respondents from APEC's private sector reported being unaware of the WTO SPS notification system (see 6.1. Knowledge and Use of WTO SPS Notification System), and given that some economies do not always notify all new SPS measures to the WTO, businesses often resort to alternative sources of information.

Figure 26 illustrates how private sector actors obtain information regarding changes in SPS measures. The most common source, cited by 47.62% of cases, is chambers of commerce, exporters' associations, or similar institutions. This is followed by direct communication from the government, reported by 35.71% of participants. Specialized websites also play a relevant role, with 28.57% of respondents using them as an information source. Commercial partners account for 21.43% of responses, while only a small share obtains information through specialized enterprises (4.76%) or other unspecified sources (7.14%). These results highlight the importance of intermediary institutions and official channels in the dissemination of SPS-related updates.

Figure 26. APEC Private sector sources of information



7. CONCLUSIONS

This follow-up study shows that APEC economies have made some progress in improving the transparency and quality of their SPS notifications to the WTO, particularly in comparison to the findings of the 2019 baseline study. These developments reflect increased awareness of the importance of transparency as a tool for trade facilitation and alignment with the obligations under Article 7 and Annex B of the WTO SPS Agreement.

In the case of regular notifications, the adjusted compatibility level stands at 58.45%, versus 56.34% in the previous study, evidencing partial but positive improvement. Emergency notifications demonstrate stronger results, with a 71.00% adjusted compliance rate, versus 45.58% in the previous study, suggesting that when urgency requires it, APEC economies are more likely to meet the recommended transparency standards. However, both types of notifications still show room for improvement, particularly in the two focus areas of this study: Item 3 (Products Covered) and Item 6 (Description of Content).

The findings reveal that three main elements require further attention:

1. Products Covered – Notifications often omit tariff codes or use generic descriptions, making it difficult for stakeholders to determine whether a measure affects their products.
2. Description of Content – Many notifications lack sufficient detail on the objective, scope, and trade implications of the measure, limiting their utility to exporters and regulatory counterparts.

Insights gathered from the private sector across 15 APEC economies reinforce these findings. The private sector pointed to persistent challenges in identifying the scope of the measures and interpreting their content. They also highlighted the language barrier—since supporting documents are rarely translated—as well as insufficient information to anticipate regulatory changes. These gaps disproportionately affect MSMEs, which have fewer resources to analyze incomplete or unclear notifications.

Nonetheless, the data collected and the feedback received show that improving transparency in just two key areas—products covered and description of content—could yield substantial impact in the short term. Focusing efforts on standardizing terminology, clearly identifying affected products using HS codes, and summarizing the regulatory content in a concise and accessible way could significantly enhance the usefulness of notifications for both the private and public sectors.

These recommendations align with the outcomes of the Sixth Review of the SPS Agreement (2025), which identified the same challenges and established a Working Group on Transparency to improve the quality of SPS notifications, facilitate translation efforts, and strengthen the visibility of comments and responses. The results of this follow-up study could serve as a concrete input to that group’s technical discussions.

In conclusion, while APEC economies still face challenges, the current study provides evidence of a constructive path forward. By building on the progress achieved and addressing remaining gaps, the region is well positioned to strengthen its contribution to the multilateral trading system, enhance regulatory cooperation, and promote a transparent, predictable, and inclusive trade environment.

ANNEXES

ANNEX 1. EVALUATION TOOL FOR REGULAR SPS NOTIFICATIONS

Number	Question	Alternatives
Code of document (G/SPS/N/...)		
Date of distribution (dd/mm/yyyy)		
Products covered		
1.1	Is the tariff item number(s) (HS) mentioned?	0: No, 1: Yes
1.2	Is the heading of the International Classification of Standards (ICS) mentioned?	0: No, 1: Yes
1.3	Does it contain any description of the products?	0: No (continue with question 2.1), 1: Yes (continue with question 1.3.1)
1.3.1	Is the description clear?	0: No, 1: Yes
1.3.2	Does it contain abbreviations?	0: No, 1: Yes
Description of content		
2.1	Is the objective of the regulation indicated?	0: No, 1: Yes
2.2	Are the probable effects on trade described?	0: No, 1: Yes
2.3	Does it contain abbreviations?	0: No, 1: Yes
2.4	Is there an outline of the specific SPS measures that the regulation will apply?	0: No, 1: Yes
2.5	Can the impacts on exports be clearly identified?	0: No, 1: Yes
2.6	In general, does the description facilitate the understanding of the proposed regulation?	0: No, 1: Yes

ANNEX 2. EVALUATION TOOL FOR EMERGENCY SPS NOTIFICATIONS

Number	Question	Alternatives
Code of document (G/SPS/N/...)		
Date of distribution (dd/mm/yyyy)		
Products covered		
1.1	Is the tariff item number(s) (HS) mentioned?	0: No, 1: Yes
1.2	Is the heading of the International Classification of Standards (ICS) mentioned?	0: No, 1: Yes
1.3	Does it contain any description of the products?	0: No (continue with question 2.1), 1: Yes (continue with question 1.3.1)
1.3.1	Is the description clear?	0: No, 1: Yes
1.3.2	Does it contain abbreviations?	0: No, 1: Yes
Description of content		
2.1	Is the content and health protection objective of the regulation indicated?	0: No, 1: Yes
2.2	Are the probable effects on trade described?	0: No, 1: Yes
2.3	Does it contain abbreviations?	0: No, 1: Yes
2.4	Is there an outline of the specific SPS measures that the regulation will apply?	0: No, 1: Yes
2.5	Can the impacts on exports be clearly identified?	0: No, 1: Yes
2.6	In general, does the description facilitate the understanding of the proposed regulation?	0: No, 1: Yes

ANNEX 3. PRIVATE SECTOR EVALUATION TOOL FOR SPS NOTIFICATIONS

Number	Question	Alternatives
1	Economy	APEC economy
2	Commercial condition	0: Importer, 1: Exporter, 2: Importer/Exporter
3	Do you know that there is a SPS notification system from the World Trade Organization (WTO)?	0: No (redirect to question 3.3) 1: Yes (continue with question 3.1)
3.1	How often do you check SPS notifications from sources provided by WTO?	1: Daily, 2: Weekly, 3: Monthly, 4: Other (please explain shortly)
3.2	How do you obtain the SPS notifications?	Checkboxes 1: Check by myself in the WTO website, 2: Government sends the information, 3: The information is provided by chambers of commerce / exporters associations / other similar organizations, 4: ePing notification alert system, 5: E-mail notifications 6: Other (please explain)
3.2.1	Which are your major challenges when you analyze the Products covered section in SPS notifications?	Checkboxes 1: The tariff item number(s) (HS) is not mentioned 2: The heading of the International Classification of Standards (ICS) is not mentioned 3: The description is not clear 4: It doesn't contain any description of the products 5: It contains abbreviations I'm not familiar with. 6: Other (please explain)
3.2.2	Which are your major challenges when you analyze the Description of content section in SPS notifications?	Checkboxes 1: The objective of the regulation is not indicated.

		<p>2: The probable effects on trade are not described</p> <p>3: It contains abbreviations I'm not familiar with.</p> <p>4: There is not an outline of the specific SPS measures that the regulation will apply.</p> <p>5: The impacts on exports can not be clearly identified.</p> <p>6: The description does not facilitate the understanding of the proposed regulation.</p> <p>7: Other (please explain)</p>
3.2.3	Please evaluate the transparency and effectiveness of information of the SPS notifications provided by APEC economies that are most important in your case	<p>Multiple choice grid</p> <p>Rows: 21 APEC Economy</p> <p>Columns:</p> <p>0: Does not apply,</p> <p>1: Not transparent at all,</p> <p>2: Somehow transparent,</p> <p>3: Transparent,</p> <p>4: Very transparent</p>
3.3	How do you get the information regarding changes on SPS measures?	<p>Checkboxes</p> <p>1: Commercial partners</p> <p>2: Government sends the information,</p> <p>3: The information is provided by chambers of commerce / exporters associations / other similar organizations,</p> <p>4: Specialized websites</p> <p>5: Specialized enterprises</p> <p>6: Other (please explain)</p>

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