India's Draft Veterinary Health Certificate for Pork Imports: Regulatory Maturation, National Treatment and Capacity under the WTO SPS

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India's draft 2026 veterinary health certificate for pork imports marks a shift from broad, OIE-referenced declarations to disease-specific attestations citing named WOAH Code articles, quantified waiting periods and integrated food safety requirements, strengthening its position under SPS Articles 2.2, 3, 5, 6 and 7. Its weakness lies in national treatment: India demands assurances on diseases present domestically and inspection standards its own fragmented, smallholder-based slaughter sector cannot meet. Credibility depends on domestic reform, not better drafting.

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Abstract

Sanitary and phytosanitary certification in India is a layered process that moves a product through scientific assessment, statutory scrutiny and physical inspection, with responsibility distributed across the Food Safety and Standards Authority of India, the Department of Animal Husbandry and Dairying, the Directorate of Plant Protection, Quarantine and Storage, and the Export Inspection Council. This paper traces the statutory basis of the FSSAI and DAHD certification pathways. Then it examines, as its analytical core, the evolution of India's veterinary health certificate for pork, comparing the certificate in force (157052/2022) with the draft notified to the WTO on 27 February 2026.

The 2026 draft replaces generic OIE references with citations to named WOAH Terrestrial Animal Health Code chapters and articles, adds standalone clauses for Classical Swine Fever and Porcine Epidemic Diarrhoea, quantifies the anthrax freedom windows, introduces antimicrobial use monitoring and Campylobacter and Salmonella biosecurity, broadens cross-species contamination controls, and adds a Food Safety Attestation that shifts the instrument from a purely veterinary check toward a fuller food safety compliance regime. Each feature is mapped onto the SPS Agreement, and the paper finds the draft materially stronger under Articles 2.2, 3, 4, 5, 6 and 7 and Annex C.

The paper argues that Article 2.3, which folds national treatment and most-favoured-nation treatment into a single obligation resting on an epidemiological rather than a commercial comparison, is the provision on which India remains most exposed. Drawing on India – Agricultural Products (DS430), it shows that the defensibility of an import certificate under Article 2.3 depends on the domestic regulatory regime rather than on the text applied at the border, and identifies the Classical Swine Fever attestation and the food safety requirements imposed on exporters as the clauses most vulnerable where domestic conditions do not match what is demanded of trading partners. This exposure is compounded by uneven diagnostic and residue-testing capacity and by a pig sector dominated by smallholder production and fragmented slaughter. Ractopamine, where India departs from an existing Codex standard, is treated as an Article 3.3 question rather than a national treatment issue.

Fifteen recommendations are advanced under five headings: closing the national treatment gap, building verification capacity, addressing the problem of scale, procedural reform, and international positioning. The paper concludes that the 2026 draft represents deliberate regulatory maturation achieved despite developing-country capacity asymmetries, and is best understood as a well-constructed legal instrument resting on an incomplete regulatory base, whose long-term credibility depends on sustained domestic investment rather than on further refinement of the text.

Keywords: *SPS Agreement; veterinary health certificate; pork imports; WOAH Terrestrial Animal Health Code; national treatment; Article 2.3; risk assessment; FSSAI; DAHD; ractopamine; regulatory capacity*.

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1. Introduction

Sanitary and phytosanitary (SPS) certification in India is best understood not as a single administrative act but as a layered process that moves a product through scientific assessment, statutory scrutiny and physical inspection before it is permitted to enter or move within the domestic market. This structure sits within the framework of the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement), and Annex C of that Agreement, which governs control, inspection and approval procedures, provides much of the conceptual scaffolding for how India has built its certification machinery. What is distinctive about the Indian system is that this machinery is not housed in a single ministry or authority. Responsibility is distributed according to the nature of the product: the Food Safety and Standards Authority of India (FSSAI) for food, the Department of Animal Husbandry and Dairying (DAHD) for livestock and livestock products, the Directorate of Plant Protection, Quarantine and Storage for plants and plant products, and the Export Inspection Council where export-specific certification is required. Each body operates under its own governing statute and has developed a certification workflow that, while procedurally distinct, follows a broadly similar arc: application, documentary and risk assessment, inspection, testing, and the issuance or refusal of a certificate.

The evolution of India's veterinary health certificate (VHC) for pork imports over the past four years offers a revealing case study in how regulatory science, animal health governance and international standard-setting shape a country's sanitary import architecture. The certificate currently in force (157052/2022) represents India's first comprehensive attempt to codify sanitary conditions for pork and pork product imports after years without a dedicated instrument for this commodity. The draft VHC notified to the WTO on 27 February 2026 marks a deliberate maturation of India's regulatory drafting practice rather than a simple update.

The paper proceeds as follows. Section 1 sets out the statutory basis of the FSSAI and DAHD certification pathways. Section 2 maps India's certification architecture, and the draft certificate in particular, onto the provisions of the SPS Agreement. Section 3 compares the 2022 and 2026 instruments clause by clause. Section 4 examines the national treatment obligation in Article 2.3, the provision on which the draft remains most exposed, and the diagnostic, laboratory and production-structure constraints that underlie that exposure. Section 5 situates the draft within India's evolving SPS framework, including its position on ractopamine and its alignment with OECD findings on veterinary certification. Section 6 offers policy recommendations, and Section 7 concludes.

1.1 Certification under the FSSAI System

The FSSAI certification process begins with an application submitted through the Food Safety Compliance System (FoSCoS), as required under Section 31 of the Food Safety

and Standards Act, 2006, which mandates every food business operator to obtain a licence or registration before commencing operations. Applicants are classified as low-, medium- or high-risk under the Food Safety and Standards (Licensing and Registration of Food Businesses) Regulations, 2011, and this classification determines the extent of regulatory scrutiny and the frequency of inspections. The application must include documentation on product categories, manufacturing processes, plant layout and food safety management systems, including HACCP, in accordance with FSSAI's standard-setting and risk management functions under Section 16. The Designated Officer scrutinises the application, seeks clarifications where necessary, and permits only compliant applications to proceed to inspection. Food Safety Officers, exercising powers under Section 38, then inspect the premises to verify hygiene, sanitation, storage conditions and the effective implementation of food safety management systems. Laboratory testing under Section 47 is undertaken where inspection alone is insufficient, with certification ultimately resting on compliance with prescribed microbiological, contaminant and additive standards.

After satisfactory completion of documentary scrutiny, inspection, and testing, the competent authority issues a licence or registration certificate under Section 31, bearing a unique licence number to facilitate traceability throughout the supply chain. Imported food is subject to an additional layer of regulation under Section 25, which requires consignments to be accompanied by a health or sanitary certificate issued by the exporting country's competent authority, followed by independent inspection, sampling and verification by FSSAI before clearance. Certification is not a one-time approval: under Section 32, FSSAI retains continuing supervisory authority to issue improvement notices, suspend or cancel licences, and conduct ongoing inspections, audits and market surveillance.

1.2 Animal Health Certification under the DAHD System

Animal health certification rests on a considerably older statutory foundation, the Livestock Importation Act, 1898. Section 3 of that Act empowers the Central Government to regulate, restrict or prohibit the import of livestock and livestock products to prevent the introduction of infectious disease, and Section 4 allows such imports to be made conditional, including on certification. Over the past century, these statutory powers have taken operational form through the sanitary import conditions and certification guidelines issued by DAHD, calibrated to the standards of the World Organisation for Animal Health (WOAH).

The process begins with an application for a Sanitary Import Permit, itself required under Section 3. What follows is a genuine risk assessment rather than a paper exercise: the competent authority examines the disease status of the exporting country, the adequacy of its surveillance systems and the relevant international standards, and from this assessment derives the specific conditions on disease freedom, vaccination status and processing that will govern the consignment. The exporting country's competent

authority then writes these conditions into the veterinary health certificate it must issue. On arrival, the consignment is inspected at a designated quarantine station; live animals may be quarantined, while animal products are typically tested rather than held. Clearance follows only once compliance with the prescribed conditions has been verified. Where India is the exporting rather than the importing country, an equivalent certificate is issued attesting to compliance with the importing country's requirements. As with the FSSAI system, certification is not a terminal event; ongoing monitoring and surveillance guard against the belated introduction of disease and ensure that biosecurity conditions continue to be met after clearance.

2. Alignment of India's Veterinary Health Certificate with the WTO SPS Agreement

Viewed through the lens of the SPS Agreement, the 2026 draft reads as a considerably more defensible instrument than its predecessor. The Indian certification architecture described in Section 1 does not merely resemble the Agreement loosely or thematically; each structural feature traces to a specific obligation, and it is worth working through that correspondence provision by provision rather than treating "alignment" as a general assertion.[2] Table 1 summarises the correspondence, and the subsections that follow develop each provision in turn.

Table 1. Alignment of India's Draft Veterinary Health Certificate (2026) with the WTO SPS Agreement

WTO SPS Provision	Core WTO Requirement	Alignment in India's Draft VHC (2026)	Significance
Article 2: Scientific basis of SPS measures	SPS measures must be based on sufficient scientific evidence and not maintained arbitrarily.	Disease-specific certification, laboratory testing, surveillance requirements and evidence-based sanitary conditions ensure import requirements are scientifically justified.	Strengthens the legal defensibility of India's measures against claims of arbitrary or protectionist regulation.
Article 3: Harmonisation with international standards	Members should base SPS measures on international standards, guidelines and recommendations.	The draft explicitly cites relevant WOAH Terrestrial Animal Health Code chapters and articles rather than generic references.	Enables India to rely on the Article 3.2 presumption of SPS consistency.

[2]Department of Animal Husbandry and Dairying, Draft Veterinary Health Certificate for Import of Pork and Pork Products into India, https://dahd.gov.in/sites/default/files/2026-02/DraftVHCforImportofPorkandPorkProducts6-2-2026_2.pdf

WTO SPS Provision	Core WTO Requirement	Alignment in India's Draft VHC (2026)	Significance
Article 4: Recognition of equivalence	Members should recognise equivalent SPS measures that achieve the importing Member's appropriate level of protection.	India accepts veterinary certificates issued by the exporting country's competent authority while retaining independent inspection and verification at the border.	Balances trade facilitation with sovereign regulatory oversight.
Article 5: Risk assessment	SPS measures must be based on an appropriate risk assessment proportionate to the identified risk.	The draft introduces disease-specific conditions, separate certification clauses, surveillance requirements and quantified waiting periods based on epidemiological risk.	Demonstrates that measures are proportionate, evidence-based and calibrated to actual disease risk.
Article 6: Regionalisation	Members shall recognise disease-free areas and areas of low disease prevalence.	The draft recognises disease-free zones, compartments and regional disease status consistent with WOAH standards.	Prevents unnecessary blanket import bans and facilitates trade from unaffected regions.
Article 7 and Annex B: Transparency	Members must notify proposed SPS measures, publish regulations and provide information to trading partners.	India notified the draft to the WTO on 27 February 2026 and publishes sanitary import conditions and certification requirements.	Promotes predictability and allows WTO Members to comment before implementation.
Article 8 and Annex C: Control, inspection and approval procedures	Certification, inspection and approval procedures should not create unnecessary delays or disguised trade restrictions.	The draft operates through structured documentary review, risk assessment, inspection, laboratory testing and post-certification surveillance based on statutory procedures.	Ensures certification remains efficient, proportionate and transparent while protecting animal and public health.

Source: Authors' compilation.

2.1 Article 2: Scientifically Grounded Measures

Article 2.2 prohibits SPS measures maintained without sufficient scientific evidence, except where the Article 5.7 provisional-measures exception applies. The Indian system's insistence on laboratory testing at multiple points, sampling under Section 47 of the FSS

Act, DAHD's disease-status assessment of the exporting country, and the plant quarantine authority's sampling for latent infestation gives Indian certification decisions their evidentiary basis. It allows India to defend a refusal to certify, or a decision to impose additional conditions, as scientifically grounded rather than arbitrary. This matters because in most SPS disputes before WTO panels, including those over hormone-treated beef and various agricultural products, the central inquiry has been whether the responding Member's measure was supported by a risk assessment of the kind Article 5.1 requires rather than resting on generalised or precautionary reasoning. A certification system built on documented laboratory results and country-specific risk assessments is structurally better placed to satisfy that inquiry than one relying on generic assurances.

2.2 Article 3: Harmonisation and the Presumption Attaching to International Standards

Article 3.1 encourages Members to base their SPS measures on international standards where they exist, and Article 3.2 creates a rebuttable presumption of consistency with the SPS Agreement (and with GATT Article XX(b)) for measures that conform to such standards. This is why DAHD's alignment of its certification conditions with WOAH standards, the plant quarantine authority's alignment with the International Plant Protection Convention's certificate format, and FSSAI's benchmarking of its standards against Codex Alimentarius are not simply matters of administrative convenience: they allow India to claim the benefit of the Article 3.2 presumption rather than having to justify every element of its measures under Article 5's more demanding risk-assessment standard. By anchoring each disease-specific condition to a named WOAH Terrestrial Animal Health Code chapter and article rather than a generic invocation of OIE guidelines, the 2026 draft positions India to claim that presumption with far greater confidence than the 2022 certificate.

2.3 Article 4: Recognition of Equivalence

Article 4 requires Members to accept other Members' SPS measures as equivalent if the exporting Member objectively demonstrates that its measures achieve the importing Member's appropriate level of protection, even where those measures differ from the importing Member's own. The reliance, across all three Indian systems, on certificates issued by the exporting country's competent authority (the foreign health certificate for food imports under Section 25, the veterinary health certificate issued by the exporting country's veterinary authority, and the exporting country's phytosanitary declarations) reflects the equivalence principle in practice, even though India layers its own independent verification on arrival on top of that certification rather than accepting it uncritically. That layering is itself defensible under Article 4, since equivalence recognition does not require blind acceptance; it requires only that a Member give genuine consideration to the exporting country's demonstrated equivalence rather than dismissing it out of hand.

2.4 Article 5: Risk Assessment as the Analytical Core

Articles 5.1 to 5.3 require sanitary measures to be based on an appropriate risk assessment that considers scientific evidence, production methods and relevant environmental conditions. DAHD's assessment of the exporting country's disease status, surveillance systems and applicable international standards before prescribing certification conditions exemplifies this obligation, particularly because animal disease risks are country- and zone-specific. A certificate that distinguishes Classical Swine Fever and Porcine Epidemic Diarrhoea as standalone risks, rather than submerging them within an undifferentiated disease list, better meets this requirement, since a measure that treats pathogens with distinct epidemiological profiles as a single category is more vulnerable to the charge that it is not calibrated to actual risk. The quantified windows introduced for anthrax, and the shift from a general three-month freedom requirement to disease-specific conditions, likewise answer the Agreement's insistence that measures not be more trade-restrictive than required to achieve the appropriate level of protection: a precise and auditable standard is easier for an exporting country to demonstrate compliance with than an open-ended assurance. Article 5.5 further requires consistency in the level of protection applied across comparable situations, a discipline examined in Section 4.1.

2.5 Article 6: Regionalisation

Article 6 requires Members to adapt SPS measures to the disease or pest status of specific regions rather than treating an entire exporting country uniformly. DAHD's reliance on disease-free zones and compartments, consistent with WOAH standards, directly reflects this principle, while the plant quarantine authority similarly recognises pest-free areas. Regionalisation enables India to adopt proportionate, risk-based measures instead of blanket prohibitions, so that an outbreak in one part of an exporting country need not result in a total trade ban.

2.6 Article 7 and Annex B: Transparency

Article 7 and Annex B require Members to notify proposed SPS measures, publish them promptly and maintain enquiry points. India's notification of the draft certificate to the WTO on 27 February 2026 discharges these obligations. It allows trading partners to comment before the measure is finalised, a procedural step that, together with the substantive tightening described in Section 3, places the draft in a considerably stronger position to withstand scrutiny in the SPS Committee or, in the event of a dispute, before a panel. Publication of FSSAI licensing regulations, processing timelines and DAHD sanitary import conditions likewise keeps certification requirements accessible to trading partners.

2.7 Article 8 and Annex C: Control, Inspection and Approval Procedures

Article 8, read with Annex C, requires that control, inspection and approval procedures not operate as disguised restrictions on trade. Annex C is the provision most directly engaged by the multi-stage certification process India operates through FSSAI, DAHD and the plant quarantine authority. Annex C(1)(a) requires that such procedures be undertaken and completed without undue delay and in no less favourable a manner for imported than for like domestic products; the staged FSSAI sequence of application through FoSCoS, documentary scrutiny, inspection, sampling and certificate issuance is precisely what Annex C contemplates as legitimate, provided each stage functions as a genuine check rather than a pretext for delay. Annex C(1)(b) requires publication of standard processing periods, and Annex C(1)(e) requires that information requirements be limited to what is necessary. The 2011 Licensing Regulations, which tie documentation to defined risk categories rather than demanding uniform maximal disclosure, secure the kind of proportionality Annex C(1)(e) aims at. Annex C(1)(f) requires that conditions for import be limited to what is necessary to attain the Member's appropriate level of protection, which is the point at which DAHD's risk-assessment-driven condition-setting becomes relevant, since it demonstrates that conditions are derived from an assessed risk profile of the exporting country rather than applied as a blanket restriction. Compliance with Article 8 therefore depends not only on maintaining rigorous sanitary controls but also on ensuring that certification procedures do not, in practice, create unnecessary delays or barriers to market access.

3. Comparative Evolution of India's Veterinary Health Certificate

The changes introduced by the 2026 draft are clearest when the two instruments are placed side by side. Table 2 sets out, requirement by requirement, how each sanitary condition is treated under the certificate presently in force (157052/2022) and under the draft notified on 27 February 2026. Read together, the entries show a consistent pattern: general references to OIE guidance give way to citations of specific WOAH Terrestrial Animal Health Code chapters and articles; bundled declarations are separated into standalone clauses; quantified timelines replace open-ended assurances; and several conditions absent from the 2022 certificate, among them Classical Swine Fever, Porcine Epidemic Diarrhoea and antimicrobial use monitoring, appear for the first time.

Table 2. Comparative Changes in India's Veterinary Health Certificate: Existing VHC (2022) and Draft VHC (2026)

Requirement	Existing Indian VHC (157052/2022)	Draft VHC (notified 27.02.2026)
Foot and Mouth Disease	Standalone clause; zone/compartment options; general OIE reference	Standalone clause; explicit citation to WOAH TAHC Chapter 8.8 and Articles 8.8.13–8.8.16

Requirement	Existing Indian VHC (157052/2022)	Draft VHC (notified 27.02.2026)
African Swine Fever	Standalone; zone-based; general OIE reference	Standalone; explicit citation to WOAH Articles 15.1.28–15.1.30
Classical Swine Fever	Not addressed as a standalone clause	New standalone clause (para iv(d))
Aujeszky's Disease	Standalone; zone-based	Standalone; explicit citation to WOAH Chapter 8.2
Trichinella	Standalone; three alternatives	Standalone; two alternatives; explicit citation to Article 8.18.5
Taenia solium	Standalone; three alternatives; no specific article citation	Standalone; explicit citation to Articles 1.4.6 and 15.4.6
Enterovirus encephalomyelitis, TGE, Tuberculosis, Porcine Brucellosis, Anthrax	Bundled under a single clause; three-month establishment freedom requirement	Anthrax separated with quantified timelines (20-day and 14-day windows); remaining diseases bundled under para (iii)
Porcine Epidemic Diarrhoea	Not addressed	New addition (para iii)
Antimicrobial Use Monitoring	Not addressed	New clause (para xi); explicit citation to WOAH Chapter 6.9
Campylobacter or Salmonella Biosecurity	Codex hygiene reference only (CAC/RCP 58-2005)	New clause (para ix); explicit citation to WOAH Chapter 6.14, replacing the Codex-only reference
Cross-Species Contamination Control	Excludes meat of species other than pork generally	Broadened to expressly exclude bovine, ovine/caprine and poultry tissue/protein

Source: Authors' compilation from the two certificates.

3.1 Rationale for the Shift from Broad Disease Certification to Disease-Specific Risk Management

The 2022 certificate grouped several diseases under common declarations, which made disease-specific verification difficult. The draft introduces standalone certification clauses for the major diseases (Foot and Mouth Disease, African Swine Fever, Classical Swine Fever, Aujeszky's Disease, Trichinella and Taenia solium), an approach that improves

traceability, facilitates veterinary verification and allows the importing authority to evaluate each disease independently based on its epidemiological characteristics. It incorporates internationally accepted concepts of zoning, compartmentalisation, establishment freedom, disease surveillance and quantified waiting periods, consistent with Articles 5 and 6 of the SPS Agreement, and it reflects current epidemiological realities by adding sanitary assurances relevant to emerging and re-emerging diseases affecting international pork trade. Finally, the explicit biosecurity measures addressing Campylobacter and Salmonella, the strengthened cross-species contamination controls and the antimicrobial use monitoring obligation extend the certificate's reach from animal disease to microbiological contamination risk and prudent veterinary practice, each of which bears on public health.

3.2 Food Safety Attestations

Beyond the sanitary declarations, the draft requires a set of food safety attestations that did not exist under the 2022 certificate. These are entirely new and cover the following:

1. The product must be manufactured at a facility approved, registered or licensed by the relevant competent authority.
2. The product must conform to the standards laid down under the Food Safety and Standards (Food Product Standards and Food Additives) Regulations, 2011.
3. It must meet the microbiological criteria set out in Appendix 'B' of the same 2011 Regulations.
4. Residues of drugs, antibiotics, mycotoxins, pesticides, heavy metals and similar substances must not exceed the limits prescribed under the Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011, and systems must be in place to demonstrate compliance with either the FSS Regulations or Codex standards.
5. Only food additives listed in Appendix 'A' of the Food Product Standards and Food Additives Regulations, 2011 may be used, and strictly within the prescribed limits.
6. The product must be handled at an establishment subject to inspection by the competent authority in accordance with FSSAI's specified requirements, and which operates a Food Safety Management System grounded in HACCP principles, wherever applicable.
7. The product must comply with the processes described under paragraph 2.5.2 of the Food Product Standards and Food Additives Regulations, 2011.

Collectively, these clauses shift the certificate from a purely veterinary check toward a fuller food safety compliance regime, requiring approved manufacturing premises, adherence to composition and additive standards, contaminant and residue limits, HACCP-based process controls and regulatory inspection oversight, none of which was attested to in the 2022 version. Animal health and food safety certification are thereby

consolidated into a single instrument, reducing the documentary fragmentation exporters would otherwise face.

4. The National Treatment Gap and Its Structural Causes

National treatment is the weak point in most accounts of India's SPS architecture, including the present draft, and deserves its own section rather than a passing mention. The provisions examined in Section 2 (Articles 2.2, 3, 4, 5, 6, 7 and 8) are those on which the draft is strongest. Article 2.3, the provision on which India has already lost a dispute, is the one on which it remains most exposed. This section sets out the obligation, India's prior experience under it, its application to the pork certificate, and the diagnostic, laboratory and production-structure constraints that make the exposure a matter of substance rather than drafting.

4.1 The Question of National Treatment: Article 2.3, Annex C(1)(a) and Article 5.5

The SPS Agreement does not import GATT Article III wholesale. It states its own non-discrimination discipline in Article 2.3, which requires that sanitary measures not arbitrarily or unjustifiably discriminate between Members where identical or similar conditions prevail, "including between their own territory and that of other Members," and that measures not be applied to constitute a disguised restriction on international trade. The clause folds national treatment and most-favoured-nation treatment into a single obligation, but on a different analytical footing from Article III:4. Where GATT Article III:4 turns on the likeness of products and less favourable treatment, Article 2.3 turns on whether conditions in the compared territories are identical or similar. The comparison is epidemiological rather than commercial. An importing Member may lawfully impose conditions on imports that it does not impose domestically, provided the difference in treatment tracks a genuine difference in disease or contamination risk. It may not require exporters to provide an assurance it tolerates the absence of domestically where the underlying sanitary conditions are the same.

Annex C(1)(a) supplies the procedural counterpart: control, inspection and approval procedures must be undertaken and completed in a manner no less favourable for imported than for like domestic products. Annex C(1)(g) extends the same logic to fees, and Annex C(1)(c) to the treatment of confidential information. National treatment therefore operates at two levels in the SPS Agreement: substantively, over the content of the sanitary requirement under Article 2.3, and procedurally, over the machinery by which compliance is verified under Annex C.

Article 5.5 supplies a third, related discipline. It requires a Member to avoid arbitrary or unjustifiable distinctions in the levels of protection it considers appropriate in different situations, where those distinctions result in discrimination or a disguised restriction on trade. The Appellate Body in *Australia – Salmon* treated this as a three-part inquiry:

whether the situations compared are genuinely comparable, whether the distinction in the level of protection is arbitrary or unjustifiable, and whether the distinction produces discrimination or disguised restriction in fact. Article 5.5 thus reaches inconsistency across a Member's own regulatory portfolio, and it often operates alongside Article 2.3 rather than independently.

4.2 India's Prior Exposure: India – Agricultural Products

India's experience in *India – Measures Concerning the Importation of Certain Agricultural Products* (DS430) makes this more than a theoretical concern. India's avian influenza measures prohibited imports from countries reporting low-pathogenic notifiable avian influenza. At the same time, its domestic response to the same disease, which was present in its territory, was substantially less restrictive. The panel found, and the Appellate Body upheld, that the measures were inconsistent with Article 2.3 in both its discriminatory and disguised-restriction limbs, and with Articles 3.1, 5.1, 5.2, 5.6, 6 and 7 and Annex B. The central failing was not that India had set a high level of protection. It was that India had not shown its domestic conditions to differ from those in the exporting Members, while nonetheless imposing on imports a standard it did not apply to itself.

The lesson generalises. The defensibility of an import certificate under Article 2.3 depends as much on the domestic regulatory regime as on the certificate's own text. A Member cannot cure an Article 2.3 problem by improving the drafting of the instrument applied at the border, because the comparison the provision requires looks inward.

4.3 Application to the Draft Pork Certificate

Under Article 2.3, the 2026 draft presents a nuanced picture. Several of its provisions are non-discriminatory both on their face and in substance. The position on ractopamine, discussed in Section 5.2, is the clearest example: India does not authorise the compound for use in food animals and prescribes no Maximum Residue Limit (MRL), so the operational limit applied at the border reflects the same prohibition applicable to domestic production.[3] Article 2.3 is not engaged, and the matter is more accurately characterised as a question under Article 3.3 concerning departure from a Codex standard. The same observation applies to the contaminant and residue limits under the Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011, and to the compositional and additive standards under the Food Product Standards and Food Additives Regulations, 2011, since these are the domestic standards enforced on domestically produced food and extended to imports through certification.

The disease-freedom attestations are more exposed, and Classical Swine Fever is the sharpest example. The draft introduces a standalone CSF clause requiring the exporting country to certify freedom or equivalent conditions. On the available epidemiological picture, CSF is present in India. If the certificate requires an exporting Member to provide

[3]Lok Sabha Unstarred Question, Annexure, https://sansad.in/getFile/loksabhaquestions/annex/171/AU3751.pdf?source=pqals

a level of assurance about CSF that India's own production and marketing system does not deliver domestically, the structural parallel to DS430 is close. India would need to demonstrate that conditions in its territory and in the exporting Member's territory are not identical or similar, or that the distinction in treatment is neither arbitrary nor unjustifiable. That demonstration is available in principle: domestic and imported products occupy different positions in the risk chain, and an importing Member may legitimately seek to prevent the introduction of additional strains or the reintroduction of disease into zones it is working to clear. But it must rest on a documented risk assessment rather than on assertion, which returns the analysis to Article 5.1.

The food safety attestations raise a similar inquiry in a different register. The draft requires imported pork to come from establishments approved, registered, or licensed by the competent authority, subject to official inspection, and operating under a HACCP-based food safety management system. As Section 4.5 shows, a significant portion of domestic pig slaughter takes place at facilities that meet none of these criteria. The asymmetry is evident; whether it is unjustifiable under Article 2.3 is more complex, and two credible positions exist. The first holds that Article 2.3 requires a comparison of sanitary conditions rather than regulatory stringency, and that a Member implementing a phased approach to domestic food safety infrastructure is not obliged to postpone import requirements until domestic coverage is complete. The second holds that Annex C(1)(a) expressly requires procedures no less favourable for imported than for like domestic products, and that a regime demanding official veterinary attestation, establishment approval and HACCP documentation of importers sits uneasily with that requirement when a substantial share of the domestic market is served by uninspected slaughter.

This paper concludes that the draft strengthens India's position under Articles 2.2, 3, 5, 6 and 7 while leaving its Article 2.3 exposure broadly unchanged. Article-level WOAH citation does not answer a national treatment complaint, because such a complaint does not ask whether the measure conforms to an international standard; it asks whether India applies to itself what it demands of others. Closing that gap requires domestic reform (expansion of registered slaughter capacity, animal identification, and domestic disease control programmes) rather than further refinement of the certificate text. The remainder of this section explains why that reform is demanding.

4.4 Asymmetries of Technological and Diagnostic Capacity

In practical terms, the certification model envisaged in the 2026 draft is a claim about laboratory capacity. A declaration that a consignment originates from an establishment free of a specified disease within a defined period is only as credible as the surveillance system that underpins it, and a statement of compliance with a residue limit is only as reliable as the analytical methods that can detect the analyte at the specified threshold. Leading pork-exporting nations discharge these obligations through infrastructure built over decades: national residue monitoring plans with statistically designed sampling frames, networks of accredited laboratories using validated confirmatory methods,

electronic animal identification and movement databases enabling traceability to the herd of origin, and slaughter facilities under continuous or near-continuous official inspection. In such jurisdictions, the certificate is largely a documentary synthesis of data the system routinely generates.

India's position differs in kind, not degree. Its capacity for animal disease diagnostics is concentrated in a limited number of central and regional institutions, with state-level laboratories varying considerably in accreditation status, equipment and throughput. Confirmatory residue analysis at trace levels requires liquid chromatography–tandem mass spectrometry operated under methods validated and maintained to ISO/IEC 17025 accreditation; such instrumentation exists in India but is unevenly distributed, and capacity is shared across a broad spectrum of commodities and regulatory programmes. The ractopamine position illustrates the point: a limit set at the threshold of quantification is meaningful, and a zero-tolerance stance credible, only where laboratories can reliably detect and confirm at that level across a representative sample of consignments, rather than merely specify the limit in regulation. Section 6.2 returns to what this requires.

4.5 The Structural Problem of Scale: Smallholder Production and Fragmented Slaughter

The primary constraint lies upstream of the laboratory, in the structure of production itself. Pig rearing in India is predominantly a smallholder and backyard activity, concentrated in the north-eastern states and in parts of eastern and central India, with very small herd sizes, low-input feeding and limited or no engagement with formal veterinary services. Geography reinforces this pattern. India's agro-climatic diversity, from tropical and arid zones to humid, temperate, and high-altitude regions, directly affects the viability of pig production. The Indian Council of Agricultural Research (ICAR) has recognised thermal stress as a major constraint: pigs have substantial subcutaneous fat and few functional sweat glands, and rely largely on panting and wallowing to dissipate heat. ICAR studies in Assam recorded summer Temperature-Humidity Index values of 79.55–82.56, with feed intake, weight gain and feed-conversion efficiency adversely affected, and research across agro-climatic zones in Nagaland found significantly lower body weights and delayed reproductive performance at the high-altitude location of Kiphire (approximately 2,500 m) than at low-hill sites. The 20th Livestock Census recorded approximately 9.06 million pigs nationally in 2019, but the distribution is highly uneven: Assam alone had about 2.099 million, while Gujarat had 658 and Jammu & Kashmir 1,215. Pig production is therefore neither uniformly suitable nor equally viable across India, and heat, humidity, altitude, seasonal stress and the availability of suitable housing, feed, water and adapted breeds constrain productivity and raise the cost of keeping pigs in particular regions. This dispersed and regionally concentrated structure has three implications for certification.

First, it complicates surveillance where it matters most. The disease-freedom attestations the draft requires (establishment freedom, zone or compartment status, defined

observation periods) presuppose that animals are housed in identifiable, registered holdings with monitored and recorded health status. When the production unit is a household keeping a few animals, often unregistered and outside any organised movement-control system, the epidemiological unit on which certification relies is difficult to define and harder still to monitor continuously. Compartmentalisation, designed for commercial units under a common biosecurity management system, does not translate easily to dispersed backyard operations.

Second, it fragments the point of slaughter. Certification for international trade assumes slaughter at approved establishments equipped for ante- and post-mortem inspection by an official veterinarian, with provision for chilling, sampling and secure packaging. A significant portion of pig slaughter in India occurs at local, unregistered or municipal facilities where such inspection is not conducted to export standards and where the physical infrastructure for HACCP-based process control is lacking. The required conditions exist only in a small number of export-oriented, largely integrated commercial establishments that have invested in accredited abattoir infrastructure. The certification architecture therefore governs a narrow, capitalised segment of the industry. At the same time, most national output is consumed in the unorganised domestic market, moving through local butchers and wet markets without formal inspection, licensing or traceability, and without any domestic counterpart to the food safety assurances the certificate demands of imported product.

Third, it imposes an uneven cost burden. Accreditation, cold chain investment, HACCP implementation and participation in residue monitoring entail substantial fixed costs that integrated commercial operations can spread across volume, but that smallholders cannot bear individually. Certification infrastructure is consequently accessible only through consolidation, contract farming or producer aggregation. That outcome is justifiable on food safety grounds, but it carries distributional effects that policy discussion often leaves unaddressed.

4.6 Why These Constraints Sharpen the Significance of the Draft

These constraints should not be read as a criticism of the 2026 draft; if anything, they make its drafting quality stand out more. It is comparatively easy to write a rigorous certificate when the underlying surveillance and laboratory system already generates the data the certificate demands. It is considerably harder to draft to international best practice while simultaneously building that system, with fewer surveillance, laboratory and drafting resources than the major exporting economies command. The draft should therefore be understood as partly aspirational in its domestic application: it sets the standard toward which India's own veterinary infrastructure is being built while also governing imports. That dual function is common among developing-country SPS instruments and is not objectionable in itself. What it does mean is that the regime's credibility over time will depend less on the certificate's text than on sustained investment in accredited laboratory capacity, animal identification and traceability, registered

slaughter infrastructure, and extension services that reach smallholder producers. Without that investment, the gap between what the certificate asserts and what the system can verify will widen, and trading partners will probe that gap under Articles 2.2 and 5.1.

5. India's Evolving SPS Framework and Trade Implications

Section 4 identified where the draft is exposed. This section sets out the countervailing case: how India's certification architecture has supported safe trade and economic growth, how the ractopamine position should be characterised, and how the draft measures up against international benchmarks for veterinary certification.

5.1 How India's SPS Certification Architecture Supports Safe Trade and Economic Growth

1. **Reduced rejection risk at destination markets.** A system that verifies compliance before export, rather than leaving verification entirely to the importing country's border authorities, lowers the incidence of consignments rejected, quarantined or destroyed on arrival, protecting exporter revenue and market reputation.
2. **Access to markets that would otherwise remain closed.** Because Article 4 conditions market access on a trading partner's willingness to recognise equivalence, a credible domestic certification system is often the precondition for a foreign market opening at all; the pork VHC's alignment with WOAH standards is such an instance.
3. **Lower transaction costs through standardised documentation.** The FoSCoS portal and the standard-form veterinary and phytosanitary certificates issued by DAHD and the plant quarantine authority replace case-by-case negotiation over documentation with a predictable, repeatable process, reducing the compliance burden per consignment and making exporting viable for smaller producers.
4. **Insulation from WTO dispute exposure.** Measures resting on documented risk assessment and, where available, international standards carry the Article 3.2 presumption of consistency, reducing exposure to disputes alleging disguised protectionism (Section 2.2).
5. **Partial rather than blanket market closure.** DAHD's zone- and compartment-based disease-freedom conditions under Article 6 mean an outbreak in one part of an exporting country need not close trade from unaffected zones (Section 2.5).
6. **Investor and industry confidence in export-oriented production.** A predictable, statutorily grounded certification pathway gives domestic food, livestock and processing industries the confidence to invest in cold chains, HACCP-compliant facilities and accredited abattoirs, because the conditions for market access are known in advance.
7. **Public health protection as a precondition for sustained trade.** Import-side certification (Section 25 of the FSS Act; DAHD's post-arrival quarantine and testing) protects the domestic market from imported disease and contamination risk, which

sustains the political legitimacy of continued trade liberalisation; a system perceived as unsafe domestically is more likely to face reversal.

8. **Signalling regulatory seriousness to trading partners.** The 2026 draft's shift to article-level WOAH citation and its new clauses demonstrate that India's SPS regime evolves in step with international scientific consensus, lowering the perceived regulatory risk of concluding new market-access agreements with India.

5.2 India's Regulatory Approach to Ractopamine and Maximum Residue Limits

Ractopamine hydrochloride is a beta-agonist feed additive widely used in the United States pork industry to promote muscle growth and improve feed efficiency. It is the principal regulatory divergence between India and the major exporting economies. Codex has adopted tissue-differentiated MRLs of 10 µg/kg for muscle and fat and higher figures for liver and kidney. India does not approve ractopamine for use in food animals, and the Food Safety and Standards (Contaminants, Toxins and Residues) Regulations, 2011 (as amended) prescribe no residue limit for it in pork or pork products. Where the 2011 Regulations prescribe no MRL for a veterinary drug residue, DAHD applies an operational limit of 0.01 mg/kg (10 µg/kg) uniformly across edible tissues. That figure functions as a default limit of quantification rather than a toxicologically derived MRL; it is equivalent to the Codex limit for muscle and fat and stricter for offal, and because the compound is unapproved domestically it operates in practice as a zero-tolerance position.

As Section 4.3 explained, this is not a national treatment issue, since the border limit reflects the same prohibition applied to domestic production. It is a question of departure from an existing Codex standard, which attracts the burden of justification under Article 3.3 rather than the presumption under Article 3.2. The position is defensible as an expression of a higher appropriate level of protection. Still, its credibility rests on two things: an articulated scientific justification (Section 6.5) and the analytical capacity to detect and confirm at the stated threshold (Section 6.2).

5.3 Alignment of India's Draft VHC with OECD Findings on Veterinary Certification

1. **Science-based, disease-specific certification anchored to WOAH standards.** The OECD observes that Article 5.2.4 and Chapter 5.10 of the WOAH Terrestrial Animal Health Code together set out the guidelines for veterinary certification. That certification should rest on internationally accepted animal health standards. The draft cites the relevant chapters (FMD Chapter 8.8, ASF Chapter 15.1, Aujeszky's Disease Chapter 8.2, Trichinella Chapter 8.18, and Chapters 6.3 and 6.9 on slaughter hygiene and antimicrobial use). It requires separate attestations for each major disease.

2. **Use of model veterinary certification principles.** WOAH provides model certificates under Chapter 5.10. The draft follows that model by requiring certification by an Official Veterinarian, standardised sanitary declarations, exporter and importer details, product identification, establishment approval numbers and official authentication.

3. **Food safety integration consistent with Codex principles.** The OECD notes that Codex guidance complements WOAH standards in official certification. The draft's Food Safety Attestation (Section 3.2) combines animal health and food safety certification in a single document.

4. **Certification by the competent veterinary authority.** The OECD stresses that the exporting country's Veterinary Authority should issue veterinary certificates. The draft requires certification and signature by an Official Veterinarian or authorised official, reinforcing official accountability.

5. **Biosecurity and secure supply chains.** The OECD highlights the need to prevent fraud and preserve certification integrity. The draft advances this by mandating biosecurity measures, preventing post-slaughter contamination, direct transport to approved slaughterhouses, antimicrobial monitoring, and secure packaging compliant with Indian regulations.

6. Policy Recommendations

The preceding analysis supports a single organising conclusion: the 2026 draft is a well-constructed legal instrument resting on an incomplete regulatory base. Its weaknesses are not drafting flaws. They lie in the surveillance data, laboratory capacity, slaughter infrastructure and domestic disease control programmes that must exist if the assurances the certificate demands of exporting Members are to be credible, verifiable and defensible under Articles 2.3 and 5.1. The recommendations below address that institutional and infrastructural gap rather than the certificate text, and are grouped under five headings.

6.1 Closing the National Treatment Gap

(a) Commission a documented risk assessment for each disease-freedom attestation where the disease is present in India

The exposure identified in Section 4.3 is concentrated in those clauses, Classical Swine Fever most prominently, where India requires an assurance from exporting Members in respect of a disease present within its own territory. The asymmetry is justifiable only based on a documented assessment showing that domestic and imported products occupy materially different positions in the risk chain, or that the distinction protects zones India is actively working to clear. DAHD should prepare and place on record a disease-specific risk assessment supporting each such clause before finalising the draft. In DS430 the difficulty was not the level of protection India had chosen but its inability to demonstrate that domestic conditions differed from those in the exporting Members. That evidentiary deficit is best avoided in advance rather than in the course of dispute proceedings.

(b) Sequence domestic disease control alongside import conditions

Where a certification condition has no domestic counterpart, the most durable response is not to soften the import requirement but to extend the equivalent discipline

domestically. A time-bound national programme for Classical Swine Fever control, coupled with progressive zone-level self-declaration through the WOAH WAHIS mechanism, would convert an Article 2.3 vulnerability into an Article 6 strength by allowing India to point to genuinely differentiated regional disease status rather than to an unexplained differential between domestic and imported product.

(c) Extend inspection coverage to the domestic slaughter sector on a published timetable

Imported products are required to have establishment approval, official inspection, and a HACCP-based management system. At the same time, a substantial share of domestic pig slaughter occurs at unregistered or municipal facilities where no comparable control operates. A phased domestic programme with published milestones would materially reduce the force of any complaint under Annex C(1)(a), and a published timetable is itself evidence of good faith even where coverage remains incomplete.

6.2 Building Verification Capacity

(a) Expand accredited residue-testing capacity, with priority to confirmatory methods

The enforceability of the ractopamine limit described in Section 5.2 rests entirely on analytical capability. A zero-tolerance position is defensible for as long as India can demonstrate detection and confirmation at that level across a representative sample of consignments, and no longer. Investment should accordingly prioritise confirmatory analytical capacity (LC-MS/MS under ISO/IEC 17025-accredited methods) and participation in inter-laboratory proficiency testing over any increase in the number of laboratories alone, since an unaccredited or unvalidated result adds nothing to the evidentiary record that Articles 2.2 and 5.1 require.

In the short term this capacity need not be built entirely within the public veterinary laboratory network. University and institutional laboratories, particularly those attached to veterinary science, food technology and analytical chemistry departments, already hold much of the necessary instrumentation and expertise and are frequently underused for regulatory purposes. A structured empanelment programme, under which selected academic laboratories are accredited for specified analytes and methods and integrated into the official testing framework, would expand confirmatory capacity faster and at lower marginal cost than establishing new facilities. It would also link academic training to industry compliance needs, build a pipeline of analysts familiar with regulatory method validation, and create an institutional constituency for maintaining accreditation standards. Safeguards on independence, chain of custody and conflict of interest would be needed where the same institution also serves industry, but these are manageable through the terms of empanelment.

(b) Establish a national residue monitoring plan with a statistically designed sampling frame

Major exporting economies discharge their certification obligations through monitoring programmes that routinely generate compliance data, so that the certificate operates as a documentary summary of an existing evidentiary record. India should move toward the same model for pork, with an annual sampling plan, published methodology and public reporting of results. Such a plan would supply precisely the scientific record that Articles 2.2 and 5.1 require and would strengthen India's position as both an importing and an exporting Member.

(c) Strengthen and standardise state-level diagnostic laboratories

A programme of accreditation support, standardised method adoption and shared reference-laboratory arrangements would reduce the variance in state laboratory capacity described in Section 4.4. This matters because state-level surveillance conclusions ultimately underpin any zone or compartment claim India may wish to advance internationally.

6.3 Addressing the Problem of Scale in Production

(a) Build a functioning animal identification and traceability system for the pig sector

Establishment freedom, zone status and defined observation windows all presuppose an identifiable epidemiological unit whose health status is monitored and recorded. Extension of animal identification and movement recording to the pig sector, beginning in the north-eastern states where production is concentrated, is a precondition for any credible domestic application of the concepts the certificate employs.

(b) Support aggregation models that do not exclude smallholders

If certification remains accessible only through consolidation, the distributional consequence is the progressive exclusion of the producers who account for the bulk of national output. Producer collectives, shared-service abattoirs and contract farming arrangements with negotiated terms offer routes to compliance that do not depend on individual scale and warrant targeted policy support.

(c) Prioritise investment in registered slaughter infrastructure

Public investment in registered abattoir capacity, with provision for ante- and post-mortem inspection, chilling, sampling and secure packaging, addresses simultaneously the domestic public health deficit, the national treatment exposure discussed in Section 4.3, and the narrow export base.

6.4 Procedural and Institutional Reform

(a) Publish standard processing periods for each certification procedure

Annex C(1)(b) requires publication of standard processing periods and Annex C(1)(a) requires completion without undue delay. The technical quality of the certificate will not

insulate India from complaint if clearance in practice proves slow, opaque or unevenly applied. Publishing indicative timelines for sanitary import permits, consignment clearance, and laboratory turnaround, with periodic reporting of actual performance against them, is a low-cost measure with a direct bearing on Article 8 compliance.

(b) Establish a standing equivalence assessment procedure under Article 4

India's layering of independent verification on top of exporting-country certification is permissible, but Article 4 requires genuine consideration of a demonstrated claim of equivalence. A published procedure specifying how such claims are to be submitted, assessed and answered, and within what period, would place that consideration on a transparent footing.

(c) Strengthen the SPS enquiry point and inter-agency coordination

The 2026 draft, which combines animal health and food safety attestations in a single instrument, cuts across at least two of the four statutory mandates described in Section 1. A formal coordination mechanism, with a single point of contact for trading partners, would reduce the risk of inconsistent interpretation at the border and improve responsiveness to enquiries under Article 7 and Annex B.

6.5 Positioning and International Engagement

(a) Place the ractopamine position on an explicit Article 3.3 footing

Because India's ractopamine position departs from an existing Codex standard, it attracts the burden under Article 3.3 rather than the presumption under Article 3.2. India should articulate the scientific justification for its higher level of protection in advance, rather than allowing the position to rest on the absence of a prescribed MRL in the 2011 Regulations.

(b) Engage constructively with comments received on the notified draft

Notification on 27 February 2026 discharges the transparency obligation, but the value of the comment period lies in the response. Reasoned engagement with objections raised in the SPS Committee, and visible amendment where objections are well founded, materially strengthens the position of any measure subsequently challenged.

(c) Use the certificate as a template, and share the experience

The drafting method adopted in the 2026 draft (article-level citation to the WOAH Code, disaggregation of diseases by epidemiological profile, quantified windows in place of open-ended assurances, and integration of food safety attestations) is transferable to other commodities and to other developing-country Members facing comparable constraints. Extending it to India's other sanitary import conditions, and engaging through South–South regulatory cooperation, would multiply the return on the capacity already invested.

7. Conclusion

The movement from the 2022 Veterinary Health Certificate to the 2026 draft is better understood as a change in regulatory method than as a routine revision of an existing form. The earlier certificate discharged its function through broad declarations and generic invocations of international guidance. The draft replaces that approach with disease-specific attestations tied to named WOAH Code chapters and articles, quantified waiting periods, the disaggregation of pathogens whose epidemiological profiles have little in common, new clauses for Classical Swine Fever, Porcine Epidemic Diarrhoea, antimicrobial use monitoring and Campylobacter and Salmonella biosecurity, and a Food Safety Attestation that changes the character of the document from a veterinary check into a consolidated animal health and food safety instrument.

Measured against the SPS Agreement, this matters for legal rather than presentational reasons. Article-level WOAH citation positions India to claim the Article 3.2 presumption; disease-specific conditions derived from an assessed risk profile answer the Article 2.2 and 5.1 inquiry that has proved decisive in most SPS disputes; layered reliance on exporting-country certification gives effect to Article 4 without surrendering oversight; recognition of zones and compartments satisfies Article 6; and notification discharges Article 7 and Annex B. The draft is a materially more defensible instrument than the certificate it would replace.

Three qualifications temper that assessment, and all three rest on a single structural fact: certification of this kind is a claim about surveillance and laboratory capability, and India's capability is unevenly distributed. At the same time, its pig sector remains largely outside registration, movement control and formal inspection. The first and most significant qualification is national treatment. The draft leaves India's Article 2.3 exposure broadly where it stood, because a national treatment complaint asks not whether the measure conforms to an international standard but whether India applies to itself what it demands of others; where the certificate requires assurances about a disease present within India, or demands establishment approval and HACCP-based control from exporters while much domestic slaughter proceeds uninspected, the parallel to DS430 warrants attention. The second concerns administrative practice: technical sophistication in drafting will not insulate India from criticism under Annex C if clearance in practice becomes slow, opaque or uneven. The third is ractopamine, a genuine point of divergence that is defensible as a higher appropriate level of protection but that carries the Article 3.3 burden and will be examined closely by trading partners.

None of this diminishes what has been achieved. Developing-country WTO Members are frequently characterised as recipients of standards settled elsewhere. The 2026 draft suggests a more active posture, in which a Member operating under real constraint nonetheless produces a science-based, transparent and internationally harmonised sanitary instrument of its own. By consolidating scientific justification, international harmonisation and procedural transparency within a single certificate, India reaffirms its

sovereign right to protect its livestock and consumers while strengthening its standing as a rules-based participant in the trading system. The recommendations in Section 6 aim to convert a well-drafted instrument into a fully verifiable one. If acted upon, the pork certificate may serve not only as India's sanitary condition for a single commodity but as a working template for other developing economies building their own SPS architecture under comparable constraints.

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