



Comments on the Americas Partnership for Economic Prosperity (APEP) Trade Track

Docket No. USTR-2024-0009

July 22, 2024

The Institute for Agriculture and Trade Policy (IATP) is pleased to comment on this Request for Comments on the Trade Track of the Americas Partnership for Economic Prosperity (APEP). IATP is a 37-year-old Minnesota-based 501(c)(3) nonprofit organization, with offices in Washington, D.C. and Berlin, Germany. IATP's mission is to work locally and globally at the intersection of policy and practice to ensure fair and sustainable food, farm and trade systems.

IATP is a member of Citizens Trade Campaign (CTC). We support CTC's comments on APEP. CTC's calls to eliminate investor state dispute settlement (ISDS) from existing and future trade deals, to protect labor rights and to enhance climate standards in trade are especially relevant to food and farm systems.

While we very much appreciate the Biden administration's focus on fairness and worker-centered trade policy, agricultural trader policy seems to have changed very little. There is still an overwhelming emphasis on expanding the volume of production even when prices are low and then opening export markets to absorb U.S. agricultural over-capacity. Corporate concentration in agriculture has hurt family farmers in the Global North and South.

In addition, the droughts and flooding exacerbated by the unfolding climate crisis, as well as events such as the war in Ukraine, have contributed to recurring disruptions in food prices and supplies. These crises affect urban consumers and farming communities in the United States and our trading partners. It is imperative to develop new approaches to trade policy that help to increase resiliency, reduce volatility in agricultural supplies and prices, and promote investment in local diversified food systems. Many of these approaches will require major changes to the Farm Bill and other food and agriculture policies, but trade policies can help or impede these changes. As a starting point, we urge USTR to explore the following actions with APEP partners:

- 1) **Remove obstacles to agroecological innovations** that support biodiversity and advance family farmers' efforts to feed their communities. Current U.S. trade agreements require countries to ratify the 1991 International Union for the Protection of New Varieties of Plants (UPOV-91). That agreement prohibits family farmers from saving and sharing protected seeds, greatly inhibiting their ability to develop new varieties that respond to their specific environments and their cultural and dietary needs. Moves to ratify UPOV-91 have led to massive resistance by farmers' movements and other civil society organizations in Mexico, Colombia and Guatemala, to name just a few examples. The U.S. should remove that requirement from existing trade agreements.

The current U.S. trade dispute over Mexico's programs to restrict the use of genetically modified corn and glyphosate in foods for direct human consumption heads in the wrong direction, favoring corporate agricultural biotechnology over Mexican government decisions support agroecological practices that respect local priorities and Indigenous rights. Instead, the U.S. should join Mexico to conduct collaborative scientific research on the impacts of genetically modified corn and glyphosate on human and environmental health in a situation in which corn is such a central part of the diet. Rather than insisting on business as usual, the U.S. should be a partner in developing new solutions, potentially with other APEP countries.

- 2) **Enhance consumers' right to know about their food.** The APEP talks provide an important opportunity to restore Country of Origin Labeling for meat and other agricultural products. The traceability of animals in the supply chain is important both to inform consumers and to monitor potential food safety and animal diseases, including those that could potentially spread to people. Greater transparency should also extend to efforts to improve food labeling. During the negotiations for the Trans-Pacific Partnership and the U.S.-Mexico-Canada Agreement (USMCA) there was a strong push for a "junk food annex" that would allow companies to hide information on ingredients in processed foods as proprietary information. The U.S. should commit to full transparency in food labeling and urge trading partners to do the same.
- 3) **Support farmers' efforts to grow healthier and more sustainable foods at fair prices.** The U.S. should continue to exclude Farm to School and other programs to promote locally grown foods from public procurement commitments in trade. Those programs provide important markets and fairer prices for farmers who are producing with regenerative or organic production methods. The U.S. and its trading partners should also explore greater use of Organic Equivalency Arrangements outside of formal trade agreements that serve to raise organic standards to their highest levels. At the same time, there must be strong enforcement of organic standards to prevent fraudulent exports that unfairly depress prices. Overall, the strong priority must be to enable resilient and sustainable food systems that are fair to local farmers, farmworkers and consumers rather than to open up new export markets.

Finally, a more open and participatory negotiating process could lead to further innovations and inspire greater confidence among the public, civil society groups and Congress. We reiterate CTC's calls to publish U.S. APEP proposals for public comment before tabling them and to publish other countries' proposals and any draft composite texts at the close of each APEP negotiating round.

Thank you for this opportunity to comment.

Sincerely,

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