

March 10, 2014

Ambassador Michael Froman  
United States Trade Representative  
Washington, DC

Dear Ambassador Froman,

We the undersigned 29 community, farm, environmental and consumer organizations are writing to express our concerns over possible measures in the Transatlantic Trade and Investment Partnership (TTIP) that could have sweeping ramifications for how meat and other animal products will be produced in the United States and EU in coming decades, as well as in developing countries around the world.

Rather than an opportunity to raise standards that protect public health and the environment, the meat and feed industries on both sides of the Atlantic are seeking to proliferate destructive practices in the animal agriculture industry with ramifications for other parts of the world. If industry submissions to the USTR are accepted as the U.S. negotiating position, our government will be encouraging a race-to-the-bottom approach to regulatory oversight, weakening food safety, worker safety and environmental protections that Americans support.

For instance, the meat industry has advocated for TTIP to do the following:

Weaken US standards on mad cow disease: The EU meat industry is seeking to overturn the US ban on the import of cattle and cattle products from the EU. The United States bans the import of feed ingredients that include ruminant materials that are known to transmit bovine spongiform encephalopathy (BSE), commonly known as mad cow disease. The EU and its member states' policies governing the use of ruminant materials in livestock feed are insufficiently stringent and inconsistently applied to prevent BSE contamination, but the EU is already considering relaxing its measures, which would increase the risk of BSE contamination and transmission.

Weaken EU standards for chemicals, additives and veterinary drugs: The US meat industry is targeting several EU rules that prohibit chemicals, additives or veterinary treatments that are commonly used in the United States but have not been approved in the EU due to concerns about animal and human health.

The US Department of Agriculture sanctions the use of chlorine, tri-sodium phosphate, and hypobromous acid to treat poultry for salmonella and to sterilize feces that might still be on carcasses because production line speeds are excessive. These practices not only endanger the lives of meat factory workers, government inspectors, but also American consumers and should not be exported abroad.

The US pork industry widely uses the feed additive ractopamine to increase growth, although the practice is banned in 160 countries. Livestock treated with the drug can suffer significant adverse health effects. The EU has not approved ractopamine because the human studies were inconclusive, included too few subjects, and failed to address subpopulations like children who might be more vulnerable to ractopamine's effects. The US should be working towards a ban on ractopamine to strengthen our own food safety and animal welfare standards, and not export this harmful practice to other parts of the world.

Nations in the EU have made progress in eliminating the non-therapeutic use of antibiotics in food animal production, a major contributor to the increase of antibiotic resistant bacteria, the increase of antibiotic resistant infections in people, and reduced efficacy of antibiotic treatment in human medicine. Led by Denmark and Sweden, the member states of the EU are developing mandatory regulations regarding antibiotic use for EU members that are much more stringent than what currently exist in the United States. In 2013, the Centers for Disease Control and Prevention reported that a minimum of 23,000 deaths occur each year due to antibiotic resistance—with 80% of antibiotics sold in the U.S. dedicated to food animal production. It is clear that trade policy should be supporting stronger U.S. regulation to reverse this public health crisis rather than insisting that other countries weaken their health provisions.

Threaten local food systems: The growing movement in the United States to rebuild local food systems relies heavily on leveraging local, state and federal procurement dollars to increase the aggregate demand for locally farmed crops and livestock, as well as value-added production of local foods. There can be climate, health, environmental, agricultural, and consumer benefits to such procurement approaches. The EU's draft negotiating mandate for the TTIP includes a demand for "enhanced mutual access to public procurement at all administrative levels (national, regional and local)" and for the pact to "address barriers having a negative impact on each others' public procurement markets, including localization requirements."

The USTR has shown leadership at the World Trade Organization by defending U.S. Country-of-Origin-Labeling (COOL). This is leadership that supports local, independent meat producers and empowers consumers to make informed choices about where their meat is produced and the types of animal products they want to buy. The USTR should show similar leadership when it comes to promoting localization rather than seeing it as a "barrier" in TTIP.

In addition, global meat companies and agribusiness have urged the US Trade Representative to work towards a deal that:

- Removes EU restrictions on the use of animal byproducts in animal feed

- Removes other humane and quality standards for animal products, such as the somatic cell count limit for dairy (which indicates mastitis, an infection of breast tissue) and animal welfare regulations that came into force in the EU in January for pig housing.

These industry demands, if accepted, will undermine the progress being made in the United States to make our animal agriculture system more humane, healthy and sustainable. At a minimum, any pursuit of the TTIP or other trade agreements should carve out the issues outlined above, as well as other public interest protections that ensure public and environmental health and social well being.

The fact that the U.S. and EU have refused to publish negotiating texts -- which is accepted practice at the World Trade Organization and other multilateral negotiations -- means that we are compelled to consider what might be at risk under this accord. We urge you to immediately publish negotiating texts on these and other important issues in the trade agreement to foster an informed public debate.

We would welcome opportunities to discuss these issues with you and hope for an open dialogue about where the USTR stands on these issues and to learn the extent to which our government's position is being formulated in an inclusive manner that takes into account public health, environment, consumer, animal welfare concerns and those of rural communities helping to rebuild local and regional food systems.

If you have any questions or need more information, please contact Shefali Sharma at the Institute for Agriculture and Trade Policy at [ssharma@iatp.org](mailto:ssharma@iatp.org).

Sincerely,

Animal Legal Defense Fund  
 Center for Food Safety  
 Center for a Livable Future  
 Compassion in World Farming U.S.  
 Dakota Resource Council (ND)  
 Dakota Rural Action  
 Farm Aid  
 Farm and Ranch Freedom Alliance  
 Food & Water Watch  
 Friends of the Earth U.S.  
 Healthy Food Action  
 Hmong National Development, Inc.  
 Humane Society U.S.  
 Humane Society International  
 Institute for Agriculture and Trade Policy

Iowa Citizens for Community Improvement  
 Land Stewardship Project  
 Missouri Rural Crisis Center  
 National Family Farm Coalition  
 Natural Resources Defense Council  
 Oakland Institute  
 Oregon Rural Action  
 Powder River Basin Resource Council  
 R-CALF  
 Second Chance Foundation  
 Socially Responsible Agriculture Project  
 Waterkeeper Alliance  
 Western Colorado Congress  
 Western Organization of Resource Councils