



CENTER FOR INTERNATIONAL ENVIRONMENTAL LAW

September 2, 2014

Office of the United States Trade Representative  
600 17th Street NW  
Washington, DC 20508

*Submitted electronically via [www.regulations.gov](http://www.regulations.gov)*

Attn: **Docket: U.S.TR-2014-0012**

Re: **Comments Regarding the T-TIP Environmental Review**

Dear Sir or Madam:

The Center for International Environmental Law (CIEL) respectfully submits the attached Comments Regarding the T-TIP Environmental Review to docket number USTR 2014-0012 on behalf of 314 individuals.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carroll Muffett'.

Carroll Muffett  
President & CEO

**Attachment**

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## Comments Regarding the T-TIP Environmental Review

Submission to the Office of the United States Trade Representative

We, the undersigned, are writing to urge that the US Trade Representative's environmental review of the Trans-Atlantic Trade and Investment Partnership (TTIP) include rigorous analyses on how the pact could affect domestic and international environmental laws and policies. With one of the main aims of TTIP being to limit "non-tariff barriers to trade" -- which often contain protections for people and the environment -- it is essential that the environmental review examine the range of potential impacts, including with respect to conservation initiatives, energy and climate policy, and toxic chemicals. The potential impacts of all chapters and annexes of TTIP, in particular investment and "regulatory cooperation" (or coherence), should be examined. The following are of particular concern:

- 1) Energy Exports: TTIP could, in effect, change existing policy by requiring the US to approve all exports of liquefied natural gas and crude oil to the EU without any review of their environmental impacts. Any pact that would bind the US to a future of fossil fuel development and exports should be assessed for how it could undermine US progress on reducing carbon emissions.
- 2) Climate Policy: The review should assess how TTIP could hamper EU efforts to combat climate change. For example, reports that the USTR applied pressure through TTIP negotiations on the EU to stall or abort its proposed Fuel Quality Directive, which was intended to lower emissions from tar sands and the EU's transportation sector, are very worrying. It should also assess the potential impacts of increased fracking in the US to meet EU demands.
- 3) Health and Safety Safeguards: The review should examine how important public health and safety safeguards around toxic chemicals on both sides of the Atlantic could be impacted in TTIP. In the US this must include consideration of the implications on the ability of states to exercise their right to regulate toxic chemicals, as they have done in the absence of Federal action.
- 4) Investment: If investor-state dispute settlement (ISDS) is included in the pact, corporations would be given a new tool to sue governments for unlimited cash compensation, before private trade tribunals, over environmental laws and policies that corporations claim interfere with their profits. The impacts of investor-state claims on communities and the environments upon which they depend must be analyzed.

5) Regulatory Cooperation: TTIP should be assessed for how "regulatory cooperation" (or coherence) provisions could slow the implementation or development of stronger environmental safeguards, or dilute existing measures, at both the state and national level, under the influence of foreign governments and multinational corporations.

6) Technical Barriers to Trade: USTR has indicated that common-sense policies like energy efficiency labeling for products have created "substantial trade barriers." The review should assess how energy and climate initiatives, including energy and carbon labeling, could be threatened under TTIP.

7) Buy-local: TTIP could threaten renewable energy programs by challenging local content requirements that incentivize renewable energy; these impacts should be included in the environmental review.

In light of the Obama administration's commitment to fighting climate change and other environmental challenges, it is imperative that the environmental review of TTIP analyze any and all ways that this pact could weaken countries' abilities to implement sound environmental policies and reduce greenhouse gas emissions.

Sincerely,

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