

May 10, 2013

Office of the United States Trade Representative
600 17th St., NW
Washington, D.C. 20508

Re: Request for Comments Concerning Proposed Transatlantic Trade and Investment Agreement, FR Doc. 2013-07430, 78 *Fed.Reg.* 19566 (April 1, 2013)

The American Farm Bureau Federation, a U.S. general farm organization, supports efforts to increase agricultural trade flows and remove several major impediments to this flow that currently exist between the United States and the European Union. The Transatlantic Trade and Investment Partnership agreement (TTIP) negotiations must deal with the many substantive issues that impede agricultural trade between the U.S. and the EU such as actions that limit U.S. exports of goods produced using biotechnology, long-standing barriers against conventionally raised U.S. beef, ongoing restrictions against U.S. poultry and pork, and the use of product standards and geographic indicators to limit trade.

In addition to significant tariff barriers, expanding regulatory barriers have become a significant impediment to the growth of U.S. agricultural trade with the EU. Unless these issues are properly addressed within the TTIP we can expect these barriers to continue to limit the potential of bilateral agricultural exchange between the U.S and the EU. As a result, it is imperative to Farm Bureau that TTIP be a high-standard trade agreement that covers all significant barriers in a single comprehensive agreement. Regulatory cooperation on removing these barriers and developing uniform standards recognized on both sides of the Atlantic must adhere to sound, recognized, scientific principles. Scientific standards can be the only basis for the resolution of existing issues; else these conflicts will continue to inhibit the development of trade between the United States and the European Union.

The issues around sanitary and phytosanitary (SPS) measures and their impact on trade have been a significant part of the agricultural relationship between the U.S. and EU. Continuing barriers to the export of U.S. beef, pork and poultry, along with the slow approval process for biotech products, are major areas of interest in the negotiation. Both the U.S. and the EU adhere to the World Trade Organization's (WTO) Agreement on Sanitary and Phytosanitary Measures, which states that measures taken to protect human, animal or plant life or health should be science-based and applied only to the extent necessary to protect life or health. The U.S. follows a risk-assessment approach for food safety while the EU is additionally guided by the

“precautionary principle” which holds that where the possibility of a harmful effect exists, non-scientific risk management strategies may be adopted.

The EU has made the “precautionary principle” the focus of its approach to risk management in the SPS area. The use of the “precautionary principle” is inconsistent with the WTO SPS Agreement and is used as a basis for scientifically unjustified barriers to trade. The “SPS-Plus” chapter must result in a modern, science and risk-based approach, based on international standards, that can truly resolve SPS disputes. SPS issues must be directly addressed as a part of the negotiations and these provisions must be enforceable.

Farm Bureau is asking for substantive changes to the EU approach for approving the products of biotechnology. A lengthy approval process and the ability of EU member states to ban approvals stops trade in these products. Substantial declines in the exports of corn and soybeans to the EU have been the direct result of restrictive import policies. The EU system for regulating biotech products must be science-based and efficient in generating approvals for U.S. products.

The EU system of geographic indications (GIs) for foods and beverages that designate their production from a specific region are legally protected for their original producers. The U.S. has opposed recognizing geographical names for foods that would inhibit the marketability and competitiveness of U.S. food products. The TTIP must not become an avenue to erect a new barrier to U.S. agricultural exports through the use of geographic indications.

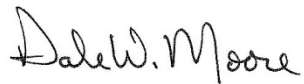
We oppose the adoption and usage of a “sustainability” standard for agricultural products in these negotiations. Under the concept of “sustainable agriculture” the European Union includes social and environmental concerns in the development and application of EU food safety standards that do not follow WTO SPS standards. Agriculture in the United States needs the flexibility to alter cropping patterns and production practices to meet the demands of a world marketplace. Sustainable agriculture must include the benefits of accepted management practices that American agriculture currently employs and be flexible enough to fit America’s diverse climates, land uses and regulatory requirements. Agriculture is only truly sustainable, and able to meet America’s and the world’s needs for safe food, fiber and fuel, when it is profitable. The usage of a “sustainability” standard would significantly limit the potential of U.S. agriculture to respond to domestic and global challenges.

With regards to tariff barriers, the negotiation proposal calls for working towards the elimination of tariffs. The average U.S. tariff for imported agricultural products is 5 percent, with 75 percent of tariff lines at zero to five percent tariff. For the EU, the average tariff on imported agricultural imports is 14 percent, with 42 percent of tariff lines at zero to five percent tariff. In order to expand market opportunities for U.S. agricultural products in the European Union tariff reductions will be necessary. The use of tariff-rate quotas (TRQs) and safeguards may be necessary to facilitate market liberalization for sensitive products.

We do not support the inclusion of current domestic support programs in the U.S. and the EU in these negotiations. The proper forum for the negotiation of domestic support for agriculture is within the multilateral negotiations of the WTO.

We call for an ambitious agreement that addresses real impediments to the growth of agricultural trade between the United States and the EU. As major agricultural trading partners the U.S. and the EU must work to improve the conditions of trade between themselves and remove long-standing trade barriers. Farm Bureau urges your careful consideration and best efforts to advance this goal for the benefit of America's farmers and ranchers.

Sincerely,

A handwritten signature in black ink that reads "Dale W. Moore". The signature is written in a cursive style with a large initial "D" and "M".

Dale Moore
Executive Director
Public Policy