



July 1, 2016

Commissioner Cecilia Malmström
Commissioner Phil Hogan
Commissioner Vytenis Andriukaitis

Three issues ahead of the 14th round of TTIP negotiations

The Federation of Swedish Farmers, LRF, has approached the Commission on the issue of TTIP before. Last together with our Finnish counterparts (letter of March 31, 2015). Ahead of the 14th round of negotiations LRF would like to highlight some specific issues within the negotiations where Swedish farmers are particularly worried about the outcome at this stage.

As we see it:

* EU-US bilateral trade should be free from meat and meat-products coming from production systems where antibiotics are used to promote animal growth.

*The European pre-farm to fork approach and not chemical decontamination should rule in EU-US meat trade.

*There should be no trade-offs that bring about higher market access for sensitive products into the EU in exchange for an agreement on Geographical Indications (GIs)

1)No antibiotics as growth promoters in EU-US meat trade . Restrictive use of antibiotics is essential for sustainable agricultural production and to safeguard public health. We therefore consider that the US use of antibiotics must be part of the TTIP discussion in the same way as hormones and beta agonists. High use of antibiotics is often the result of poor animal husbandry and welfare. Today, it is virtually impossible to find science not talking about the risks of emergence of resistant bacteria from overuse of antibiotics. The use within EU will be more restricted with the new regulation to be decided soon.

We support the Commission's approach towards consumers' concerns on differing legislation and standards in the food sector. We have noted the Commission stating that present EU policy on growth promoters, such as hormones and beta agonists (i.e ractopamine and zilpaterol) will not be changed. This is good.

_____, _____ @lrf.se

However we have not seen the same clear Commission position on the US use of antibiotics as growth promoters. In the US the use antibiotics to promote the growth of animals has long been common and a natural way of production. Producers still do not need a prescription from a veterinarian, hopefully change is on its way.

In the EU prescription from a veterinarian is compulsory and the use to promote growth is forbidden. Over 80 percent of the antibiotics assessed in the United States are used to chickens, turkeys, pigs, cattle and other farm animals. In Sweden 16 percent of the antibiotics sold are for animals.

A report ordered by the OECD points out that the consumption of antibiotics will grow immensely if we don't alter the way we breed our animals. With no major changes the global consumption of antimicrobials in farm animals is projected to rise by two-thirds by 2030 to over 100 000 tons yearly.

Reports from both US department of Agriculture and OECD have shown that the cost of change is relatively low in countries like the US where hygienic standards are already high. The EU and the US must take the lead towards using antibiotics only when animals are sick. Therefore the EU has a responsibility to keep a high profile on the issue in the context of the TTIP.

There is a consumer and policy movement in the US towards a more restrictive use of antibiotics in food production. This is something we strongly support and it should make it easier to include the use of antibiotics in TTIP. It is important that a potential US transition towards a more restrictive use is not only for conscious US consumers but also for price competitive mainstream US exports. EU can make a difference by pushing for a transition towards a more sustainable use of antibiotics in the TTIP negotiations, promoting positive US development.

2) Chemical decontamination of pathogenic bacteria is no alternative to the present European pre-farm to fork approach on food hygiene.

LRF also see a need to stress the fact that whatever chemical substance is used as disinfectant of US meat or poultry it could not be equalized with the European or Swedish pre-farm to fork approach for farm and food hygiene. This is more a question of general sustainability and a level playing field than about food safety of final food products. The choice the Commission makes in the negotiation will send strong signals to European farmers doing it the sustainable but more costly way. Good biosecurity leads to a much lower risk of infectious disease agents getting into the food chain i.e. through the vegetables and water compared to chemical decontamination. It also decreases the hazard of infecting the environment and those who work with animals to a minimum. A report from Swedish authorities shows that the cost for society, due to an elevated human disease incidence, is much higher with low biosecurity in the food chain.

EU legislation needs to be the baseline for imports from the US and other third countries. There is also a need for a transparent inspection service to verify the status of the whole production chain to be applied also in the US.

In the US chicken carcasses are dipped in chlorine and other chemical substances to reduce the risk of infectious diseases. In Europe food safety is ensured through high level of biosecurity in the entire food chain, starting in the feed industry with frequent analysis, control programs and inspections. Sweden has a long tradition of promoting prevention through high standards for healthy animals, safe feed, high quality in animal accommodation, rigorous infection and disease control and sampling across the value chain to ensure freedom from any type of salmonella. This has made it possible for Swedish farmers to deliver chickens free from salmonella to consumers without antibacterial treatment of carcasses.

LRF do not consider labelling as a solution to differing production methods. For labelling to be effective it requires a lot of knowledge and awareness from consumers. These are complex issues where it is difficult for consumers to make informed and conscious choices.

3) No trade-offs in the form of higher quotas for sensitive products to gain agreement on GIs. There need to be balance between the segment commodities and processed products when increasing US access to the European market. EU's and Sweden's competitiveness and exports lay in the segment of value-added products, while that of the US is in the production raw materials and bulk exports. Without this balance Swedish and European primary production will end up with further pressure on prices and loss of profitability. Therefore sensitive products must have their legitimate breathing space.

Trade-offs in the negotiation must not be to the detriment of individual European countries' agriculture. For example some member countries' very strong offensive interests on GIs must not be to the detriment of important interests for other member countries. Swedish farmers worry that a satisfying result on GIs will bring about bigger market access for US meat and other sensitive products.

Regards,



Helena Jonsson
President
Federation of Swedish Farmers