



American Lamb Council



American Sheep Industry Association, Inc.

[www.sheepusa.org](http://www.sheepusa.org)



American Wool Council

May 10, 2013

Re: Transatlantic Trade and Investment Partnership  
[Federal Register Volume 78, Number 62 (Monday, April 1, 2013)]  
[Notices]  
[Pages 19566-19568]  
[FR Doc No: 2013-07430]

The American Sheep Industry Association (ASI) is the national trade association for the U.S. sheep industry representing approximately 80,000 sheep producers through our 46 state affiliates and other allied organizations. ASI is pleased to submit the following comments on the Transatlantic Trade and Investment Partnership (TTIP).

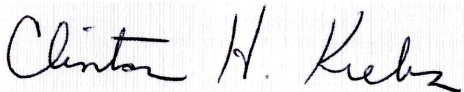
ASI believes that an effective TTIP agreement with the European Union will enhance the economic wellbeing of both parties and we are looking forward to more trade in sheep products. We refer USTR to the 2006 publication by the Centre for International Economics "*Sheepmeat Trade Reform, The Global Benefits*" (attached) as evidence of how liberalizing trade in sheep meat can benefit all market participants. The U.S. and Europe are generally recognized as the two highest-value sheep meat markets globally and it is exciting to look forward to reducing unnecessary barriers and streamlining regulatory procedures in a free trade agreement. Imported product makes up nearly half of sheep meat consumed in the U.S. and of course, reducing EU tariffs will be an important accomplishment.

We urge that the TTIP negotiations proceed in a single track for all products and all sectors in a comprehensive manner rather than in two or more phases. We also urge the negotiators to establish from the outset that sound science and scientific principles with regards to product safety and risk and that both partners' regulations will rely on international standards bodies including Codex Alimentarius and the World Organization for Animal Health. Deviations by the EU from the use of internationally accepted scientific recommendations including using the "precautionary principle" and cultural preferences when evaluating technologies and practices has been and is the basis of many trade barriers between the U.S. and the EU.

Sheep producers in both the U.S. and EU share an interest in trade with respect to access to breeds of sheep that will enhance their respective types of production systems and sheep products. Through the strategic use of outside germplasm, our respective flocks can become more efficient economically-sustainable producers of meat, wool and milk. Also, with advancements in reproductive and genetic technologies, semen and embryos can generally be traded safely and with low disease risk. We urge the negotiators to seek opportunities in an agreement to streamline regulatory procedures and, again, use sound science and OIE recommendations as the basis for the regulations.

Wool and sheep pelt trade is also important to both partners as both are producers, significant consumers and exporters of these products. We are especially concerned about the categorization of wool and pelts and urge that in the TTIP negotiations, the EU clarifies that both raw (untreated) wool and sheep pelts will not be treated as "Category 1" products as appears possible in Articles 8(c) and 8(d) of Regulation (EC) No. 1069/2009, but rather in "Category 3" of the EU regulations. Ideally, the TTIP negotiation process will be used to take a fresh look at the regulations including the TRACES registration system and make changes that will result in more streamlined and less costly regulations that can burden business as products move through trade channels.

Respectively submitted,

A handwritten signature in black ink that reads "Clinton H. Krebs". The signature is written in a cursive style and is positioned above a light blue horizontal line.

**Clinton H. Krebs**  
President