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Cobb-Vantress Incorporated

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Transatlantic Trade and Investment Agreement.

To: Office of the United States Trade Representative

Subject: Comments on current product-specific (poultry hatching eggs) opportunities to facilitate trade

Alternative to the process of health certifications of exports of hatching eggs to the European Union

The current process for exports of poultry hatching eggs is cumbersome because it requires waiting until the last egg for a given export has been collected before health certification is conducted. This adds age to the eggs and that lowers the ability of the eggs to produce a viable baby chick. The health certification process requires first the signature by an accredited veterinarian, then the document is submitted to an APHIS-VS area office and then the document is ready to accompany the eggs being exported to the EU. This process requires at least two working days when considering that the locations (hatchery of origin, accredited veterinarian, and the APHIS-VS area office) might involve considerable distance in between, requiring overnight courier services. Meanwhile the eggs have already been collected and are ready for departure.

The alternative we want to propose is similar to what is already in place for exports of baby chicks to the EU which consist of a split health certificate. The first part can be done at anytime within 10 days from export date and goes through the whole process mentioned above, collecting the signatures from the accredited and federal veterinarians. The second part is done at the time of hatch but this time only the accredited veterinarian's signature is required thus allowing to save precious time (not having to go to an APHIS area office for the additional signature which can take anywhere from hours to a couple of days (depending on total distance involved as well as the workload at that APHIS office). This process will facilitate the trade of this kind of product.

We hope that you will consider including this subject to the list of items to discuss during the negotiations related to the TTIP with the EU.

Thanks in advance for your attention to this comment. In case of any question, please do not hesitate to contact me.

Sincerely,

Alberto Torres
Exports Manager
Cobb-Vantress, Inc.