

EUROGROUP FOR ANIMALS

Roadmap on the negotiation mandate for revising an agreement with the US on the import of hormone-free beef

Feedback from Eurogroup for Animals

This note presents Eurogroup for Animals' feedback to the roadmap published on 27 March 2018 on the reopening of negotiations with the US on their import of hormone-free beef.

Background

The position of the United States on the EU's trade restrictions based on the use of hormones is well known. Each year, the US publishes a report on what they consider to be "trade barriers" built up by their trade partners. In the 2018 version, the section on "hormones and beta agonists" is quite clear: "the EU maintains various measures that impose bans and restrictions on meat produced using hormones, beta agonists, and other growth promotants, despite scientific evidence demonstrating that such meat is safe for consumers. (...) The EU's ban on growth promotant hormones in beef is inconsistent with its WTO obligations." This disagreement led to a dispute at the WTO, that ended up in a stalemate as the WTO allowed the US to impose trade sanctions while allowing the EU to maintain its ban. Finally, both parties negotiated an agreement in the form of a preferential tariff-rate quota for hormone-free beef.

Recently, complaints of US producers have grown louder, as they consider that the quota – which is not country-specific – does not result anymore in sufficient compensation. This roadmap shows that the EU has now agreed to re-negotiate. The rumours that are currently reported in the press indicate the EU's readiness to increase the US share in either the hormone-beef quota or in another one related to high quality meat, the Hilton quota. In both cases, that would mean that the issue will be solved by increasing access to the EU market for US producers, as long as they do not use growth promoting hormones or beta agonists. The opening of the hormone-free quota in 2009, which is duty-free, has resulted in a doubling of beef shipments from the US to the EU (from 6,738 tons in 2009 to around 15,000 tons in the most recent years).

Our position

Eurogroup for Animals welcomes the confirmation of the EU's commitment against the use of growth promoting hormones and beta-agonists. However, we do not consider the EU should grant more access to US beef. If it has to do so, it must absolutely include other conditions better linked to the welfare of beef cattle. The EU should even seize this opportunity to address the negative shortcomings in relation

to the farm animal welfare implications of the existing quota, which does favour unnatural high-grain diet for cattle and intensive industrial farming practices (i.e., fattening in feedlots).

Hormones/Beta agonists and the welfare of farm animals

Eurogroup for Animals considers the EU should explicitly recognize that a ban on growth promoting hormones and beta-agonists is not only necessary on the grounds of food safety and human health but also because those products have an impact on the welfare of the farm animals on which they are used.

Scientific studies on the impact of recombinant bovine growth hormone (rBGH) have been mostly carried out on dairy cows; however they showed worrying results. The use of rBGH was found to be correlated with increasing cases of mastitis (the inflammation of the mammary gland), which could be due not to the hormone *per se* but to the increased productivity triggered by the use of the hormone. In any case, this is very worrying as mastitis is among the leading causes of cows mortality. Apart from its negative effects on udder health, rBGH was shown to have other negative effects such as a higher incidence of lameness, digestive and skeletal disorders, as well as irritation at the point of injection – resulting in swelling or in other complications like abscesses or hematomas.¹ Dairy cows treated with rBGH are also more prone to heat stress, which has also been observed in beef cattle – even though there has been fewer studies on that sector.

The use of beta-agonists, such as zilpaterol or ractopamine, has been reported to increase the incidence of severe stiffness and lameness in beef cattle and to trigger episodes of heat stress that significantly increase the risk of mortality in hot weather. Beef cattle treated with zilpaterol also showed behaviours linked to pain.²

In addition, growth promotants divert the resources used by the animal to maintain itself towards speeding growth, which can make the animal being more hungry and more vulnerable to poor management.³

The EU should recognize once and for all that there is a sufficient evidence that the use of such products negatively impacts the welfare of farm animals, and that this risk, in addition to the one related to human health, is a justification for the ban it adopted decades ago.

The existing quota and its implication on farm animal welfare

The EU should not allow for more US beef to enter preferentially the European market. The use of hormones is not the only animal welfare related issue in the US. Considering the clear wish of more than 90% of EU citizens to see imported animal products meet animal welfare standards equivalent to those applied in the EU⁴, the EU should not provide any additional preferential access without conditioning it to the respect of EU-like animal welfare standards.

Hormone-free beef and grain feed

Beef that can be traded under the hormone-free quota must meet the definition of “High Quality Beef” established in the regulation. This definition contains no provision on animal welfare; it is only related to the feeding method and to the need to have an evaluation carried by a representative of a national

¹ HSUS, *An HSUS Report: Welfare Issues with the Use of Hormones and Antibiotics in Animal Agriculture*, January 2016

² *Ibidem*

³ WAP & HSI, *Beef Production in the EU and the US*, 10th July 2014

⁴ Eurobarometer 442 - Attitude of Europeans towards Animal Welfare, March 2016

government.⁵ It imposes “a diet, for at least the last 100 days before slaughter, containing not less than 62 % of concentrates and/or feed grain coproducts on a dietary dry matter basis, that meets or exceeds a metabolisable energy content greater than 12,26 mega joules per one kilogram of dry matter.” This description, well suited for the US industrial producers, excludes *de facto* from the scope of the quota any bovine meat and meat products issued from grass/forage-based production systems.

Excessive grain feed is not natural for cattle and it has been recognized by the European Food Safety Agency (EFSA) as detrimental to their welfare. It can provoke extremely rapid fermentation and the destruction of digestive flora, which may result in “abdominal pain, metabolic acidosis, and in severe cases, death.”⁶ This is also an issue that can have food safety consequences: as cows are ruminant, eating grains rather than grazing can disturb their metabolism, leading to higher *E. coli* populations that may cause severe food poisoning amongst consumers.

Hormone-free beef and industrial farming

To facilitate the trade in hormone-free beef, the US department of agriculture (USDA) established the “Non-hormone Treated Cattle” (NHTC) program⁷, which imposes for entities that wants the hormone-free certification to be registered with the USDA. The US beef industry is generally characterized by a high level of intensity. Nine years after the introduction of the hormone-free quota, it is now possible to identify and evaluate the producers that received the certification to export under it.

To this day, there are 13 USDA-recognized accredited feedlots running the NHTC program where the animals are at some point segregated to be fattened on a high energy grain diet. All are what can be called *Concentrated Animal Feeding Operations*, also known as CAFOs. This means that all cattle that will be used to produce meat that will be exported to the EU will have to pass through those very intensive industrial feedlots for at least a hundred days. The situation raises serious animal welfare concerns. The scale on which CAFOs concentrate animals is telling: AzTz Cattle, one of the accredited NHTC feedlot, has a capacity of 144,000 animals allocated over two yards. Animals living in industrial feedlots usually have health problems and injuries, they experience discomfort and risks linked to the feedlot environment, construction and design, and they do not have the ability to express their natural behaviour such as grazing.⁸ As the PEW Commission on Industrial Farm Animal Production described in a 2008 report, “poor flooring and housing conditions impact negatively on the welfare of beef cattle, which are forced to endure extremes of cold and heat, sometimes knee-deep manure when the weather is wet and faecal dust when the weather is dry.”⁹ Opening a higher quota without amending the conditions to include better animal welfare practices will only result in an aggravation of the situation.

Finally, labelling beef as High Quality only because it is marketed in the EU and does not contain growth-promoters is misleading for European consumers, who are deeply concerned about farm animal welfare.

⁵ EC Regulation 481/2012, 7 June 2012

⁶ EFSA Opinion on “Welfare of cattle kept for beef production” (SCAHAW, 2001) & EFSA Opinion on the “Welfare of cattle kept for beef production and the welfare in intensive calf farming systems” (SCAHAW, 2012)

⁷ <https://www.ams.usda.gov/sites/default/files/media/Official%20Listing%20of%20Approved%20Process%20Verified%20Programs%20for%20Service%20Providers.pdf>

⁸ WAP & HSI, *Beef Production in the EU and the US*, 10th July 2014

⁹ PEW Commission on Industrial Farm Animal Production, *Putting Meat on the Table: Industrial Farm Animal Production in America*, 2008 quoted in HSI & WAP, *Ibid*.

Increasing import of beef and live export from the EU

Eurogroup for Animals is concerned about the indirect consequences of allowing further US beef quotas into the European market. European beef producers are already struggling with the effects of other trade agreements as well as a dwindling internal demand for beef on the internal market. These phenomena are putting this sector under a significant strain, and in turn this has resulted in (successful) efforts to increase EU exports of live cattle towards third countries such as Lebanon, Turkey, Algeria, and Israel¹⁰, where after harrowing journeys the animals are slaughtered in patent violation even of the basic OIE standards. If the EU accepts increasing quotas of beef produced with dubious practices in terms of animal welfare and environmental protection regulations, it will fuel at the same time the export of live animals over extremely long distances, in terrible conditions, and with the prospect of non-stun slaughter.

This report has been prepared by Eurogroup for Animals' Trade & Animal Welfare Project. The Trade & Animal Welfare Project is made possible by:



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¹⁰ https://ec.europa.eu/agriculture/sites/agriculture/files/market-observatory/meat/beef/doc/market-situation_en.pdf