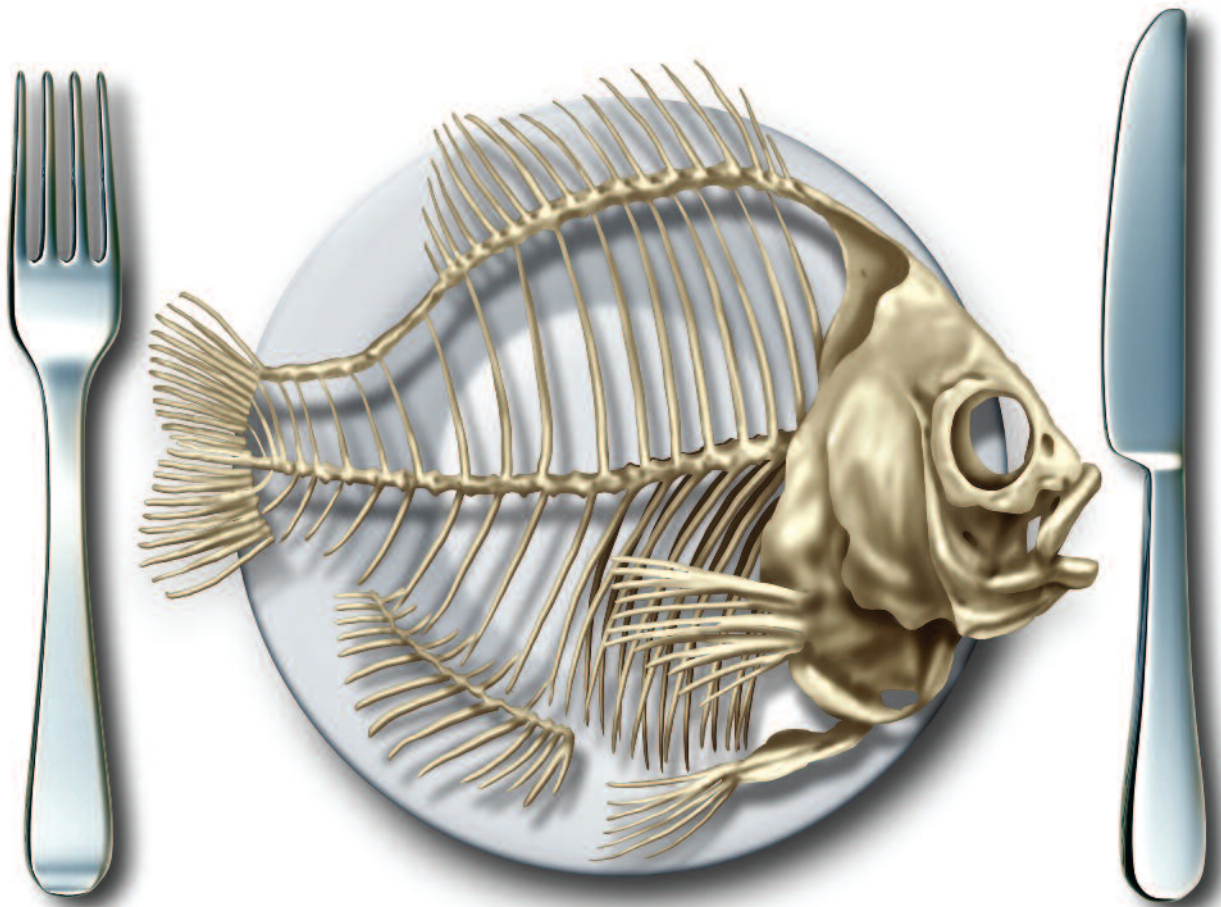


# TPP SERVES UP AN UNSAVORY DINNER



## TRANS-PACIFIC PARTNERSHIP (TPP): AN INSTRUMENT FOR CONTAMINATED FOODS

Antibiotic-laced fish? Lead-laden honey? Salmonella-contaminated fruits and vegetables? These are only a few examples of how TPP could further compromise food safety and public health.

If ratified by the U.S. Congress, TPP will increasingly determine what's on your plate.

In this report the Center for Food Safety (CFS) uncovers some disturbing examples of tainted food imports already coming from TPP countries that contain residues from drugs that are illegal in the U.S., toxic contaminants, salmonella and other pathogens, and additional unsavory substances such as rodent hairs.

NOVEMBER 2016



CENTER FOR  
FOOD SAFETY

## ABOUT US

THE CENTER FOR FOOD SAFETY (CFS) is a national non-profit organization working to protect human health and the environment by challenging the use of harmful food production technologies and by promoting organic and other forms of sustainable agriculture. CFS uses groundbreaking legal and policy initiatives, market pressure, and grassroots campaigns to protect our food, our farms, and our environment. CFS is the leading organization fighting genetically engineered (GE) crops in the US, and our successful legal challenges and campaigns have halted or curbed numerous GE crops. CFS's US Supreme Court successes include playing an historic role in the landmark US Supreme Court *Massachusetts v. EPA* decision mandating that the EPA regulate greenhouse gases. In addition, in 2010 CFS challenged Monsanto in the US Supreme Court (*Monsanto Co. v. Geertson Seed Farms*), which set key legal precedents. CFS has offices in Washington, DC, San Francisco, CA, Portland, OR, and Honolulu, HI.

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# TPP SERVES UP AN UNSAVORY DINNER

**M**OST DISCUSSIONS ABOUT the Trans-Pacific Partnership (TPP) focus on jobs and economic indicators, important to be sure. But equally important, yet rarely discussed, is how TPP could impact your dinner plate.

This report provides examples of unsafe foods already crossing U.S. borders from TPP countries and outlines how TPP could increase contaminated, tainted food imports.

TPP negotiations concluded in October 2015 and now must be ratified by the U.S. Congress in order to become the law of the land. President Obama considers the TPP to be a key aspect of his economic and foreign policy legacy and is committed to obtaining Congressional approval of the pact. All signs indicate that the TPP will be put forward in the upcoming “lame duck,” post-election Congressional session.

This agreement between Australia, Brunei Darussalam, Canada, Chile, Japan, Malaysia, Mexico, New Zealand, Peru, Singapore, United States, and Vietnam represents around 40 percent of global GDP. China may also join the TPP in the future; talks are characterized by U.S. trade officials as being a “fair distance away,” but made it clear that negotiations will continue.<sup>1</sup> Other countries such as Taiwan, Thailand, Indonesia, and the Philippines are also interested in joining TPP in the future.

Expedited trade rules in the TPP will increase food imports. As trade agreements during the last decade have accelerated, so have food imports. For example, about 15 percent of the food that Americans eat today is imported, more than double the amount just a decade ago.<sup>2</sup> Yet Congress has not adequately funded the Food and Drug Administration (FDA), responsible for 80 percent of imported foods, to ensure robust food safety inspections. At present, the FDA inspects approximately 2 percent of foods coming into the U.S.<sup>3</sup> In the case of seafood, less than 1 percent of imports are lab tested, which is necessary to find drug or chemical residues, salmonella, and other pathogens.<sup>4</sup>

**TPP blithely ignores potential threats to food safety, public health, labor, and the environment, all central to the integrity of our food system.**

**While trade officials claim that concerns are overblown, the evidence of tainted food imports from some TPP countries tells another story.**

In addition to potential health hazards—some life threatening—posed by TPP, many U.S. farmers and food producers are put at a disadvantage by the agreement. Producers in several TPP countries are able to sell products more cheaply than their U.S. counterparts, in part because of lax or non-existent safety, quality, and inspection standards and practices. Causing further alarm is the fact that labor trafficking is well-documented in some TPP countries, particularly in the seafood industry where labor conditions are brutal, dangerous, and inhumane.<sup>5</sup> In addition, agricultural and food production practices in some TPP countries gravely impact the environment. As one example: some TPP countries are destroying mangrove regions to make way for fish and shrimp farms. This deforestation has a devastating impact on local ecosystems. Mangroves are central to protecting coastal zones from dramatic storms and weather, and also play a vital role in water filtration and carbon sequestration.

TPP blithely ignores potential threats to food safety, public health, labor, and the environment, all central to the integrity of our food system. While trade officials claim that concerns are overblown, the evidence of tainted food imports from some TPP countries tells another story. Below are a few case studies that illustrate why TPP poses food safety risks.

## CASE STUDY ONE:

### The Honey Hoax—Why the Honey Jar is Not So Sweet

**F**ROM 2002-2013, massive amounts of honey containing banned antibiotics, toxic metals, and sweeteners and other additives were imported into the U.S. Referred to as “Honeygate,”

About 15 percent of the food that Americans eat today is imported, more than double the amount just a decade ago.

millions of pounds of tainted honey were produced in China and then transshipped from Malaysia or Vietnam, both TPP countries.

One of the antibiotics detected in the honey—chloramphenicol—is a known carcinogen that can also cause DNA damage in children. The drug, banned in the U.S. for use in foods, can also lead to aplastic anemia, an often fatal condition in which the body's blood cell production sharply declines. Public health experts say that even the minute amount of chloramphenicol found in corrupted honey can cause an aplastic anemia reaction in about one out of 30,000 people.<sup>6</sup>

Toxic lead contaminants are also found in Chinese honey brews due to the use of lead-based transport drum containers.<sup>7</sup> Lead poisoning is known to cause brain damage and a host of neurological disorders in children. In addition to containing toxic elements, “honey” from China is often simply a mixture of various sweeteners and other additives, with only a small amount of actual honey.

Honey smuggling became rampant after the U.S. imposed high import taxes (i.e., anti-dumping duties) in 2001 on Chinese honey because it was being sold in the U.S. at less than fair-market value. The illegal imports have been estimated to cost U.S. taxpayers up to \$100 million per year in lost import duties.<sup>8</sup> Additionally, such fraud lowers honey's fair market price and smears the reputation for quality and safety of legitimate honey producers in the U.S.

Despite numerous arrests and convictions associated with Honeygate, millions of pounds of illegal honey are still shipped to the U.S. In May 2016 Homeland Security Investigations seized nearly 60 tons of illegal Chinese honey, falsely

declared as originating from Vietnam, on its way to U.S. consumers.<sup>9</sup>

TPP, aimed to increase and ease the flow of goods among TPP nations, will make it easier for Honeygate-like frauds to continue. Such fraud not only dupes the American consumer, defrauds taxpayers, and endangers economic viability for U.S. beekeepers and honey producers but could also have serious—even fatal—health impacts.

## CASE STUDY TWO:

### Tainted Produce and Meat

EXAMPLES OF TAINTED produce and meat imports from TPP countries provide a hint of what's to come should Congress vote to approve the agreement. With implementation of other trade agreements, imports of nearly two-thirds of vegetables and fruits consumed in the U.S. have doubled over the last 10 years.<sup>10</sup> Approximately, 8–10 percent of beef consumed in the U.S. comes from other countries.<sup>11</sup> TPP will expand such trends.

The pact will increase imports from some regions where produce is grown under unsanitary practices such as using irrigated water drawn from sources where human sewage and other pollutants are not treated. For example, over the last few years, consumption of contaminated cilantro from

Puebla, Mexico, led to multiple parasitic outbreaks in the U.S.<sup>12</sup> Similarly, tainted cucumbers from Baja, Mexico, resulted in *Salmonella Poona* outbreaks in 40 U.S. states in 2015/16.<sup>13</sup> Contaminated fruits from Mexico have been a persistent problem with berries, papayas,<sup>14</sup> melons,<sup>15</sup> mangos<sup>16,17</sup> and other fruits being recalled for salmonella contamination.

Meat imports from Australia and Canada, both TPP countries, pose further threats to public health. Since Australia's meat inspection system was converted to a privatized system, there have been repeated incidents of Australian meat imports being contaminated



with fecal material and digestive tract contents.<sup>18</sup> In 2012, the U.S. recalled 2.5 million pounds of Canadian beef products that were potentially contaminated with E.coli 0157:H7, a Shiga toxin-producing pathogen so lethal that only a few of these bacteria are needed to cause illness and death.<sup>19</sup>

### CASE STUDY THREE: Something's Fishy—Unsafe Seafood Flooding into the U.S.

**T**PP INCLUDES SOME of the leading fish and seafood exporting countries in the world—Vietnam, Chile, Japan, and Malaysia are among the top 20 aquaculture centers globally.



U.S. Centers for Disease Control and Prevention reports that imported fish are the most common source of foodborne illness of imported food.<sup>20</sup>

Multiple problems encountered in fish and shellfish imports are well documented and reported.<sup>21</sup> To compensate for overcrowded, unsanitary facilities, fish and shrimp farms in Malaysia and Vietnam use chemicals and antibiotics that are illegal in the U.S.<sup>22</sup>

#### TRADE CONNECTIONS TO GROWING ANTIBIOTIC RESISTANCE

Center for Disease Control (CDC) has issued repeated warnings that overuse of antibiotics has led to rapid and “extremely dangerous” antibiotic resistance in humans.<sup>1</sup> Since the 1940s, these drugs have greatly reduced illness and death from infectious diseases. But, according to CDC, at least 2 million Americans are infected with antibiotic-resistant infections each year, and at least 23,000 die as a direct result.<sup>2</sup> Health officials cite the overuse of antibiotics in humans and food animals as a major reason for the growing resistance.

TPP will further increase imports of antibiotic-loaded seafood. Antibiotics and other drugs banned in the U.S. are regularly used in several TPP countries to combat unsanitary conditions in factory fish farms. In 2013, 100 percent of Vietnamese catfish farms used antibiotics not approved in the U.S.<sup>3</sup> Chile’s farmed salmon industry employs “unrestricted heavy usage of antibiotics.”<sup>4</sup> Most shrimp farmers in Thailand also use antibiotics as well as pesticides and disinfectants.<sup>5</sup>

U.S. border inspectors already lack resources to properly inspect today’s massive level of seafood imports. In the case of seafood, less than 1 percent of imports are lab-tested for the presence of salmonella and other pathogens, antibiotics and other drugs, and chemical residues.<sup>6</sup>

Seafood and other food imports have significantly increased with the rise of numerous trade deals over the last few decades.<sup>7</sup> Today, at least 90 percent of the seafood consumed by Americans is imported.<sup>8</sup> Contrast this with fish imports representing 54 percent of the U.S. diet only two decades ago.<sup>9</sup>

Even though the TPP will increase food imports, notably seafood, resources to inspect imports will not increase. In order to keep up with the flood of food imports the FDA reported to Congress that it would require millions of dollars in new funding;<sup>10</sup> Congress has been unwilling to grant these funds.

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As recently as October 2016, a 40,500-pound shipment of Vietnamese swai, a white fish, tested positive for the U.S. banned antibiotic nitrofurazone. In May 2016, over 40,000 pounds of catfish or catfish-like imports from Vietnam were found to be adulterated with chemicals that are illegal for use in the US;<sup>23</sup> these include gentian violet (a carcinogen), malachite green (a possible carcinogen), enrofloxacin (an antibiotic) and fluoroquinolone (an antibiotic).<sup>24</sup>

Other seafood imports also pose health hazards. Contaminated shrimp have long been a challenge for seafood inspectors. Black Tiger shrimp from Vietnam were recalled in the U.S. due to salmonella contamination in September 2016.<sup>25</sup> The FDA recently issued an import alert of Malaysian farmed shrimp after discovering illegal and unsafe antibiotics and food additives in 32 percent of samples tested.<sup>26</sup>

In addition to harmful seafood production practices, other factors can pose risks. For example, in April 2016 Formosa, a Taiwanese steel company located in Vietnam, discharged a combination of chemicals, including cyanide, into the ocean. The accident resulted in a massive fish kill in Vietnam.<sup>27</sup> Estimates are that at least 70 tons of dead fish have been found along Vietnam's central coastal areas.<sup>28 29</sup> Compounding the safety risks, dead or sick fish washed ashore for several weeks before fishing communities were told of the lethal spill, resulting in thousands of people becoming violently ill after consuming the fish. While it's unclear whether any of the fish were imported to the U.S., fisherman indicated that some ill or dead fish were sold to animal feed processors and perhaps to companies producing fish sauce.<sup>30 31</sup>

#### CASE STUDY FOUR: **Sullied Spices**

**T**HE FDA REPORTS that as much as 12 percent of imported spices are contaminated with “filth,” such as salmonella, insects, excrement, and rodent hairs.<sup>32</sup>



While the bulk of our imported spices comes from India and other non-TPP countries, a significant amount of spices are imported from TPP countries such as Vietnam and Mexico. Five percent of U.S. spice imports are from Mexico.<sup>33</sup> A 2013 report revealed that approximately 14 percent of spice samples from Mexico were contaminated with salmonella.<sup>34</sup> In 2009 and 2010, black pepper and red pepper from Vietnam, as well as China and India, used in salami caused hundreds of illnesses.<sup>35</sup>

Given that some TPP countries are known for transshipping food products, TPP could facilitate U.S. imports of contaminated spices from India and China. Indian spice imports have been under increased scrutiny because of contamination and unlabeled additives. In 2014–2015, unlabeled peanut protein was found in ground cumin or powder, mainly in processed foods, from India. Eating peanut protein can be life threatening for individuals with peanut allergies.

#### CASE STUDY FIVE:

##### **Pesticide Residues on Rice**

**I**N OCTOBER 2016, illegal pesticide residues were found on at least 95 shipping containers of jasmine rice and other rice products from Vietnam where highly toxic, older chemicals—many illegal in other countries such as the U.S.—are used on rice (and produce as well).<sup>36</sup> Vietnam's Ministry of Industry and Trade estimates that about 30–35 percent of the pesticides used in Vietnam (as of 2013) are imported illegally and contain chemicals forbidden in Vietnam.<sup>37</sup> U.S. rice imports from Vietnam averaged more than 63,500 metric tons from 2013–2015.

#### **WHAT'S FOR DINNER?**

**I**F RATIFIED BY the U.S. Congress, TPP will increasingly determine what's on your plate. Let your Congress member know that a vote *against the TPP* is a vote for a safe, nutritious food system that supports local farmers and quality-driven food producers, fair food worker labor practices, and sustainable environmental practices.

## TPP RULES THREATEN FOOD SAFETY

TPP is modeled on trade agreements of the last few decades, beginning with the North American Free Trade Agreement (NAFTA), that focus on eliminating non-tariff trade “barriers.” Prior to NAFTA the historical role of trade agreements was primarily limited to setting import tariffs and quotas. But what many corporations and some governments tout as “barriers” to trade are actually democratically constructed social, health, and environmental standards intended to safeguard citizens.

Food packaging labels, health warnings on products containing high-fructose corn syrup, food additive restrictions—these are examples of safeguards that are considered to be trade barriers under agreements like the TPP.

**Closed-Door Trade Courts Determine Food Safety and Public Health** TPP stipulates that food safety and public health measures should not be more trade restrictive than necessary. (Article 7.6c of the TPP) Such language is more than a mere suggestion. TPP’s Investor-State Dispute Settlement (ISDS) system is a powerful enforcement mechanism that incentivizes profits first, and safeguards for citizens a distant, often anemic second.

ISDS allows a foreign corporation to sue a country in a closed-door trade court over laws or policies it believes limits or could limit corporate profits. Judges in these trade courts, or trade tribunals, typically comprise three trade attorneys; many rotate between acting as tribunal judges one day to suing governments on behalf of corporations another day. (This practice of flipping between being a judge and an attorney is unethical in most legal systems but not in the ISDS system.)

When a trade tribunal rules in favor of a corporation against a country’s policy aimed to protect its citizens, the country must either cease the policy or compensate the corporation. There is no limit to the amount of money that the tribunal can order a government to pay a foreign corporation. Under NAFTA and subsequent trade investor-state systems, more than \$440 million in compensation has already been paid out to corporations challenging domestic policies on the environment, food labeling, energy, bans on toxins, and more.<sup>1</sup>

Even if a government wins a trade challenge, it is often ordered to pay for a share of the tribunal’s costs, which can be in the millions of dollars. This intimidates govern-

ment policymaking, especially for poorer nations that can’t risk being sued in trade courts. ISDS dissuades, or “chills,” governments from enacting high standards for fear of being sued in a trade court. In effect ISDS is a silent lawmaking system that erodes standards bit by bit.

**Trade Agreements Influence Domestic Laws** Threats to standards under a trade pact are often indirect but trade agreements also have direct impacts on domestic food safety and consumer right-to-know laws. In an extraordinary example of how a trade agreement can overturn a nation’s domestic laws, Congress rescinded U.S. “country of origin” labeling laws for beef and pork in response to a World Trade Organization’s (WTO) trade court ruling in 2015. WTO’s trade court system only allows legal challenges between member countries and does not allow corporations to directly sue a country as does the ISDS under TPP. Nevertheless, even under WTO’s arguably more stringent system, foreign governments successfully changed a U.S. labeling law. As a result, pork and beef supermarket labels no longer let consumers know where the livestock was born, raised, and slaughtered.

**Legal Challenge Over U.S. Catfish Inspections?** The specter of a TPP may already be influencing U.S. seafood inspection practices. Currently, 75 percent of catfish imports come from Vietnam. Even though the U.S. Food and Drug Administration (FDA) tests only 1 percent of seafood imports, inspectors have found illegal antibiotics and other chemicals in catfish (and other seafood) from Vietnam and other Asian nations. In an effort to better ensure public health, catfish border inspection and testing were transferred from budget-constrained FDA to the more robust U.S. Department of Agriculture inspection system. After only a few months, catfish import rejections significantly increased under rigorous USDA inspections.

Countries exporting catfish to the U.S. are none too happy about this. Even before TPP is ratified, Vietnam has invoked the chilling phrase “unfair trade barrier” about the bumped up U.S. inspection of catfish. This is a clear signal that should the TPP be ratified, Vietnam intends to legally challenge U.S. border inspections of catfish and other seafood under ISDS. It seems the Senate took this into consideration when, in May 2016, it voted to end the more consistent USDA catfish inspection program and transfer inspections back to the resource-poor FDA. The measure awaits action in the House.

continued on next page

## Other TPP Measures Threatening Food and Public Health Standards

### Limiting and Restricting Food Inspections at the Border

There are numerous measures in the TPP that inhibit food import inspections. For example, a TPP country must promptly notify another TPP country, or exporting company, if a suspect import is stopped or restricted. Border inspectors are required to swiftly justify the reasons for their decisions and, in turn, the exporter can challenge the decision. (Articles 7.11.6 and 7.11.8 and 7.11.9) Such TPP requirements will pressure border inspectors, already without adequate resources, to expedite potentially suspect goods into the U.S. Further, these measures provide foreign countries and companies an entrée into determining food safety and public health policies of another country.

**Genetically Engineered (GE) Crops and Foods** Many countries that do not allow GE crops or foods have enacted import controls accordingly. For example, a country will sometimes reject a U.S. corn shipment with Low Level Presence of GE corn. Under TPP rules, a country must justify its risk assessment procedures and demonstrate that its rejection of a GE-contaminated import is “appropriate to achieve compliance . . . .” Such cumbersome requirements will place a steady pressure on countries to become more lenient with their laws on GE products. And, perversely, such trade rules pressure a country to continually defend its right to reject GE

products but doesn’t hold the exporting country of a GE-contaminated shipment accountable.

Additionally, TPP’s Market Access chapter contains, for the first time, a new section on “modern biotechnology” (e.g., nano materials in foods, new genetic engineering techniques, etc.). Placing this section under the Market Access chapter instead of the Sanitary and Phytosanitary (SPS) chapter—the health and food safety section where rules on biotechnology have traditionally been located—seems to provide companies an easier path to legally challenge a country’s restrictions on some biotechnology products and methods in foods. In other words, companies may be able to challenge a country’s biotechnology safeguards under Market Access rules versus the more complex, science-based rules under SPS.

**Lower Standards for Scientific Evidence** Other TPP measures emphasize that risk assessments must not restrict trade and also be economically feasible. TPP lowers scientific standards when assessing risk assessment of a product. Essentially, it allows food safety products and practices to be validated by confidential corporate studies, unsubstantiated by scientific peer review. (Article 7.17.6) (For a more thorough review of scientific review standards in TPP, see *Following Breadcrumbs*, Karen Hansen-Kuhn <http://www.iatp.org/documents/following-breadcrumbs-tpp-text-provides-clues-to-us-positions-in-ttpp>)

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<sup>41</sup> <http://www.sciencedirect.com/science/article/pii/S1573521413000535>

<sup>42</sup> <http://www.sciencedirect.com/science/article/pii/S1573521413000535>

<sup>43</sup> <http://www.sciencedirect.com/science/article/pii/S1573521413000535>