

**Submission by the National Pork Producers Council
Federal Register Notice USTR – 2015 – 0010
Office of the United State Trade Representative
Trade Policy Staff Committee
“China’s WTO Compliance”
September 23, 2015**

The National Pork Producers Council (NPPC) submits the following comments to the Office of the U.S. Trade Representative, in response to Federal Register Notice USTR-2015-0010, entitled “China’s WTO Compliance.”

NPPC is a national association representing a federation of 43 state producer organizations and the federal and global interests of 67,000 U.S. pork producers. The U.S. pork industry is a major value-added enterprise in the agricultural economy, and a significant contributor to the overall U.S. economy.

China is a potentially enormous market for U.S. pork exports. Total Chinese pork consumption was 56 million metric tons (MT) in 2014, compared to 8.6 million MT of domestic pork consumption in the United States. China by itself accounts for over 50 percent of world pork consumption.

The United States is a low cost producer of pork in the world today, and is capable of delivering high quality pork products to China at prices significantly below those prevailing in China. While China has in recent years become a major market for U.S. pork exports, U.S. pork sales to China in 2015 dropped sharply. Total U.S. pork exports to China in the first six months of 2015 have declined 40 percent from the same period in 2014, from 157,000 MT to 93,000 MT.

Chinese import restrictions on pork are a major factor in the recent decline in U.S. pork sales to China.

China’s Ractopamine Ban

China maintains an effective ban on the import of pork produced with ractopamine hydrochloride (“ractopamine”), a feed ingredient commonly used by the U.S. pork industry to improve efficiency in pork production. China’s ban on imports of pork produced with ractopamine has been in place since 2006, and has acted as a major barrier to U.S. pork sales in the Chinese market.

Ractopamine was approved for use in U.S. pork production in 1999, following an extensive review by the U.S. Food and Drug Administration. In addition to the United States, ractopamine is approved for use in 26 countries around the world, including several in Asia. In 2012 the *Codex Alimentarius* recognized the safety of ractopamine, establishing recommended maximum residue levels (MRLs) for the product in cattle and swine production.

Ractopamine Control Program and China's Delisting of U.S. Pork Plants

Although NPPC strongly opposes China's ongoing ban on the import of pork produced with ractopamine, it has nonetheless worked with the U.S. Department of Agriculture in the development of a program that provides USDA certification that pork shipped to China is being produced without the use of ractopamine. NPPC has supported the development of this program in order to avoid disruptions in U.S. pork sales to China. Under the ractopamine control program, implemented in July 2014, pork exporters may participate in either a "Ractopamine Residue Testing Program" or a "Never Feed Beta-Agonists Program" to receive USDA certification that pork shipped to China has been produced without ractopamine.

As one of its WTO accession commitment, China signed an "Agreement on U.S.-China Agricultural Cooperation". Among the provisions contained in that agreement is a commitment by China that it "will accept meat from all USDA FSIS approved plants", while preserving the right to conduct random audits. All establishment with approved FSIS Corrective Action Plans currently ineligible to export to China should be reinstated as eligible to export.

Veterinary Drug Maximum Residue Limits (MRLs)

China maintains MRL requirements for some veterinary drugs that are below the Codex recommended MRLs. China should adopt MRLs that are based on science and that align with Codex where possible.

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