



HUMANE SOCIETY INTERNATIONAL

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Via Electronic Mail
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To Whom It May Concern:

On behalf of Humane Society International (HSI), we hereby submit these comments on the Draft Interim Report of the *Trade Sustainability Impact Assessment of the AA to be negotiated between the EU and Central America* (April 1, 2009) (“Impact Assessment”).

HSI is the international arm of The Humane Society of the United States (HSUS). Together, HSUS and HSI represent one of the largest animal protection organizations in the world with a constituency of over 11 million people and a significant global presence. HSI actively participates in discussions of international trade policy at international institutions, such as the World Trade Organization (WTO), addressing such issues as equitable development, humane and sustainable agriculture, environmental conservation, and wildlife and habitat protection.

HSI also implements a number of trade capacity building and technical assistance programs in developing WTO Member countries to support sustainable economic development, including humane agricultural practices and habitat and wildlife protection policies. Many of the programs that HSI runs and supports in Latin America are trade capacity building and/or environmental cooperation programs born out of the Central America-United States-Dominican Republic Free Trade Agreement (CAFTA-DR). For example, HSI’s programs include hands-on training on wildlife handling, rescue and rehabilitation, and workshops on compliance with national laws implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). HSI helps small cacao farmers improve production, improve quality, and work towards organic certification for shade-grown cacao, which provides a habitat for migratory birds and other wildlife. HSI’s ecotourism program provides communities that are reliant on income from activities that are harmful to local endangered species and their habitats with alternative, non-extractive methods for capitalizing on their natural resources while also increasing their earnings. HSI has also worked with the beef industry in Costa Rica to strengthen animal handling, transport and slaughter practices that improve the treatment of animals, result in higher yields of better quality meat products, and will eventually expand export opportunities for Costa Rican farmers and producers to niche markets in the United States and elsewhere that will pay a premium for humanely raised and slaughtered meat products.

Through these experiences, HSI has learned that trade agreements can be a powerful tool for promoting environmental and animal protection, while also contributing to economic development and the improvement of local livelihoods. We are pleased to see that the Impact Assessment identifies environmental issues in the EU and Central American countries that will be examined more closely in the next phase of the study, such as climate change, biodiversity conservation, overuse of marine resources, and deforestation, among others. *See Impact Assessment* at pp. 21-22, 26-27. However, we

believe that several additional issues must be part of the impact assessment and negotiations process, as well as any resulting Association Agreement, as explained below.

Wildlife Protection and Enforcement and Farm Animal Welfare Should be Included in the Impact Assessment, Subsequent Studies, and the Text of the Association Agreement

Two environmental issues not specifically identified in the Impact Assessment that require consideration are (1) wildlife protection and enforcement, and (2) farm animal welfare. Any assessment of the trade impacts on the environment in the EU and Central America would be incomplete without consideration of these issues. We strongly recommend that they be taken into account as the next phase of the trade impact assessment study is prepared, and the text of the Association Agreement is negotiated.

Wildlife Protection and Enforcement

First, while the Impact Assessment mentions biodiversity protection, it does not specifically identify wildlife protection and enforcement as issues for further consideration. Increased trade through an EU-Central America Association Agreement will impact wildlife as new trade routes and markets emerge for legal and illegally traded wildlife. Further, increased demand for forest or agricultural products will likely lead to loss of habitat for thousands of animals that will then be vulnerable to poaching and illegal wildlife trade. This will put additional pressure on species populations that are already suffering due to climate change. Finally, illegal wildlife trade is linked to global organized crime in narcotics and arms trafficking and the spread of disease. These harmful effects can be mitigated if they are identified early and specific commitments are incorporated into the Association Agreement committing the Parties to taking action.

To this end, we recommend that the Association Agreement require all Parties to bring their national laws into compliance with CITES, commit to biodiversity conservation, and combat illegal wildlife trade in particular. In HSI's experience, trade agreements can be a useful vehicle for the development and implementation of a CITES compliance program, which would focus on all aspects of wildlife protection and enforcement, including wildlife rescue and rehabilitation, support for rescue centers, ecotourism as an alternative income source to poaching and illegal wildlife trade, and public awareness. Such a program should incorporate all sectors of society – government, academics, private industry, and non-governmental organizations.

Farm Animal Welfare

Second, there is no mention of the impact on farm animals in the Impact Assessment. This is of particular significance considering that an Association Agreement is likely to increase trade (or, at a minimum, increase trade opportunities) in agricultural products, such as beef. While this could provide opportunities to improve animal welfare practices and food quality, and lead to increased incomes for local communities in Central America, it is critical that any future Association Agreement does not encourage the growth of intensive farming systems in that region, particularly since these systems are being phased out or banned in the EU. To ensure this does not result, the Impact Assessment and future studies must consider this issue; namely, how to prevent the spread of intensive farming systems while simultaneously improving animal welfare practices.

HSI further recommends that the Agreement itself incorporate animal welfare by including it as a key cooperation/trade capacity building program, and by explicitly addressing it in the Sanitary and Phytosanitary Chapter (SPS Chapter).

In terms of cooperation/trade capacity building, HSI supports the prioritization of environmental cooperation programs aimed at promoting higher animal welfare standards and practices, such as those HSI is engaged in through CAFTA-DR. For example, HSI developed and implemented a Farm Animal Welfare program under CAFTA-DR that includes establishing animal welfare as a relevant issue to the animal agriculture industry and introducing basic humane handling practices that address growing concerns for improved animal welfare and food quality. Additionally, HSI assisted with the development of lesion studies to measure evident economic losses due to poor practices during handling, a direct result of deficient animal welfare policies. This first-hand evidence is a great tool for directly establishing the benefits of higher animal welfare in the beef industry. Several members of the industry work alongside HSI to improve animal welfare practices, in recognition and preparation of possible market access in the future.

With regard to the language of the Agreement itself, HSI recognizes that animal welfare is of great importance to the EU, and we were pleased to see that the SPS chapter of the EU-Chile Agreement includes provisions governing animal welfare with respect to stunning and slaughter. We believe that the EU-Central America Association Agreement can go even further to promote animal welfare and protection. Specifically, we support inclusion of higher animal welfare practices during transport, which includes loading, off-loading, and lairage, as well as handling in the SPS chapter to complement the provisions on stunning and slaughter in the EU-Chile Agreement. Clearly, the EU recognizes the importance of higher animal welfare during transport and handling, as reflected in its regulations and regional research and outreach efforts with members of the production chain both within its Member Countries and abroad.

Funding and Resources

Finally, we recommend that research be done to determine adequate levels of funding necessary to implement technical assistance and trade capacity building programs in Central America that enhance environmental and animal protection, and promote economic development for local communities.

The EU is an important potential export market for Costa Rica and other Central American countries. It is critical that a free trade agreement be accompanied by strong legal provisions, monetary and human resources, and on-the-ground training and assistance that allow these countries to benefit from the trade agreement by engaging in programs similar to the HSI CITES Compliance and Farm Animal Welfare Programs. We believe the EU-Central America Association Agreement negotiations framework lends itself to such an outcome, and we respectfully request that future negotiations and agreement take these comments into consideration.

We can provide additional information as needed.

Sincerely,



Marta Prado
Executive Director, International Trade and Development