



# SEAFOOD SAFETY AND THE TRANS-PACIFIC PARTNERSHIP (TPP)

**T**he Trans-Pacific Partnership (TPP) is a trade deal currently under negotiation among 12 nations—Australia, Brunei Darussalam, Canada, Chile, Japan, Malaysia, Mexico, New Zealand, Peru, Singapore, United States, and Vietnam. The TPP 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 worldwide.

Already about one in five shrimp, three in five crabs, and three in five catfish consumed by Americans come from TPP countries (2012 data).<sup>1</sup> In many TPP countries, farm fish are raised with chemicals and antibiotics that are not allowed in the U.S. The TPP aims to reduce or eliminate trade barriers on fish imports, further increase U.S. seafood imports, and put additional pressures on already inadequate federal inspection of seafood imports. Currently, just over 1 percent of imported fish and seafood shipments is inspected or tested.<sup>2</sup> More than half of these are only sight inspected “for obvious defects that would be apparent without laboratory analysis.”<sup>3</sup> In sum, TPP could negatively impact food safety of U.S. citizens and also contribute to the continuing decline of jobs in the U.S. seafood sector. Additional food safety hazards could reach the U.S. if China is included in the TPP (see *Seafood Imports from China*).

## SEAFOOD IMPORTS AND FOOD SAFETY

- ▶ U.S. Centers for Disease Control and Prevention found that imported fish were the most common source of foodborne illness from imported food from 2005-2010.<sup>4</sup>
- ▶ Fish/shellfish alone make up 20 percent of food imports refused by FDA, largely due to the high percentage of aquaculture products, which are associated with **veterinary drug residues and unsafe additives**.<sup>5</sup>
- ▶ Around 25 percent of fish purchased from supermarkets by researchers in North Carolina contained **formaldehyde**. All contaminated samples were imported from Asian countries.<sup>6</sup>
- ▶ In 2013, 100 percent of Vietnamese catfish farms used **antibiotics** not approved in the U.S.<sup>7</sup>
- ▶ U.S. scientists found that 44 percent of catfish and related species from China, Vietnam, Thailand, Indonesia, and Cambodia from 2002-2010 tested positive for an antibiotic **banned in the U.S.**<sup>8</sup>
- ▶ Pathogens have also been a frequent problem in seafood imports, including *Salmonella* and *Listeria*.<sup>9</sup>
- ▶ Residues of **nitrofurans** continue to be found in imported shrimp,<sup>10</sup> but have been banned by FDA in animals produced for

food since 2002 because their residues “are carcinogenic and have not been shown to be safe.”<sup>11</sup>

➤ **Malachite green** is banned in aquaculture in the U.S., EU, and Canada due to its suspected mutagenicity,<sup>12</sup> but has been detected by FDA in imported eel and several species of imported fish.<sup>13</sup>

➤ A class of synthetic antibiotics called **fluoroquinolones** is regularly found in several species of imported fish.<sup>14</sup> According to the World Health Organization (WHO), the use of fluoroquinolones in food animals has led to the emergence of resistant bacteria that are generally cross-resistant to other antibiotics used in humans.<sup>15</sup>

➤ **Chloramphenicol** is not approved for use in any food-producing animals in the U.S., but has been detected in imported shrimp, crayfish, and crabs.<sup>16</sup> Its use in humans is restricted to life-threatening situations when less toxic drugs are ineffective because it causes a type of bone marrow depression, which is usually irreversible and fatal.<sup>17</sup>

## CURRENT STATE OF IMPORTED SEAFOOD OVERSIGHT

➤ In 2009, 80 percent of total seafood in U.S. food supply was imported. Roughly 9 out of 10 fish eaten in U.S. is imported, and 50 percent of fish imports are farm-raised.<sup>18</sup>

➤ In 2011, only **90 federal seafood inspectors examined 5.2 billion pounds of imports**.<sup>19</sup> As a result of inadequate resources, just over 1 percent of imported fish and seafood shipments is inspected or tested, more than half of which are only sight inspected “for obvious defects that would be apparent without laboratory analysis.”<sup>20</sup>

➤ The U.S. Food and Drug Administration (FDA), tasked with regulating imported seafood safety, requires seafood processors to meet Hazard Analysis and Critical Control Point (HACCP) standards. In 2012, the Government Accountability Office (GAO) stated that **33 percent of foreign seafood processors did not adequately identify hazards** in their HACCP plans.<sup>21</sup>

➤ GAO chastised FDA in 2011 for using an outdated approach to assessing the safety of seafood imports, despite significant increases in imported seafood and the emergence of aquaculture as a major source of seafood imports; GAO stated that **imported seafood has been subjected to “limited U.S. oversight by FDA”** (emphasis added).<sup>22</sup>

➤ In contrast to low inspection rates in the U.S., the European Union, in contrast, inspects 20-50 percent of imports and found four times more veterinary drug violations on imported seafood than the U.S.<sup>23</sup>

## POTENTIAL IMPACTS OF TPP ON U.S. SEAFOOD INDUSTRY

➤ The number of **mid-sized fishing businesses in the U.S. fell by 22.7 percent** between 2002 and 2011 as the volume of fish

and seafood imports grew by 23.7 percent.<sup>24</sup> TPP would further increase seafood imports, impacting U.S. jobs.

➤ Catfish imports from Vietnam increased from 7 million pounds in 2000 to 228 million pounds in 2012.<sup>25</sup> At less than half of the price of American catfish, the federal government acknowledged in 2013 that Vietnamese catfish harmed U.S. catfish farmers,<sup>26</sup> and an estimated **22,000 domestic catfish industry jobs have been lost** over the past decade.<sup>27</sup>

➤ Shrimp imports rose from 125 million pounds in 2000 to 224 million pounds in 2012.<sup>28</sup> Corresponding to the high volume of imports, the U.S. commercial shrimp industry dropped by **30 million pounds and \$200 million**, about a third of the value of the shrimp catch a decade earlier.<sup>29</sup>

## FURTHER POTENTIAL IMPACTS OF TPP

➤ TPP aims to reduce or eliminate trade barriers, including U.S. tariffs and non-tariff barriers, on fish imports, increasing the flow of fish products into the U.S. in conjunction with less regulatory oversight.

➤ Food labels could be challenged as non-tariff trade barriers under TPP, which would impose **limits on labels** providing information on where a food product comes from.<sup>30</sup>

➤ Under TPP, seafood imports could be allowed in the U.S. even though other TPP countries may use additives and veterinary drugs that **do not follow U.S. food safety guidelines**.<sup>31</sup>

## SEAFOOD IMPORTS FROM CHINA

➤ In 2006, FDA issued an import alert for eels produced in China, and in 2007 issued an alert for all farm-raised catfish, shrimp, carp, and eel from China.<sup>32</sup>

➤ FDA issued an import alert in 2013 on five species of aquaculture fish imported from China because of **illegal drugs and additives**.<sup>33</sup>

➤ According to U.S. Department of Agriculture: “Most fish and shrimp imported from China are cultured in ponds that frequently have poor water quality. **Farmers commonly use drugs to control disease and fungal infections** in these ponds” (emphasis added).<sup>34</sup>

➤ Shipments of eels from China have been **contaminated with pesticides**.<sup>35</sup>

## WHAT YOU CAN DO

Contact your legislators and tell them you oppose TPP!

## ENDNOTES

- <sup>1</sup>Food & Water Watch. *Trans-Pacific Partnership (TPP): Fast Track to a Gusher of Imported Fish*. Food & Water Watch Fact Sheet. April 2014.
- <sup>2</sup>Von Eschenbach, Andrew C. MD. “Enhanced Aquaculture and Seafood Inspection—Report Congress.” *U.S. Food and Drug Administration*. November 20, 2008. Available at: <http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Seafood/ucm150954.htm>.
- <sup>3</sup>*Ibid.*
- <sup>4</sup>Centers for Disease Control and Prevention. [Press release]. “CDC research shows outbreaks linked to imported foods increasing.” March 14, 2012.
- <sup>5</sup>Gale, Fred & Jean C. Buzby. *Imports from China and Food Safety Issues*. Washington, DC: United States Department of Agriculture Economic Research Service. 2009.
- <sup>6</sup>Andrews, James. “Formaldehyde Detected in Supermarket Fish Imported from Asia.” *Food Safety News*. September 11, 2013. Available at: <http://www.foodsafetynews.com/2013/09/formaldehyde-detected-in-supermarket-fish-imported-from-asia/#.VGu5i8l5p6a>.
- <sup>7</sup>Rico, Andreu et al. “Use of veterinary medicines, feed additives and probiotics in four major internationally traded aquaculture species farmed in Asia.” *Aquaculture*, 412-413. 2013. at 234; Engle, Carole R. University of Arkansas at Pine Bluff. Chair of Aquaculture/Fisheries Center. “Food Safety Issues Related to Imported Catfish from Asia.” September 10, 2013 at 17.
- <sup>8</sup>Gilbert, Nicole. “Tainted Seafood Reaching U.S., Food Safety Experts Say.” *News21*. 2011. Available at: <http://foodsafety.news21.com/2011/imports/seafood/>.
- <sup>9</sup>Gale & Buzby, 2009. At 17.
- <sup>10</sup>Baughman, Kim W. Dr. *Drug Residues in Imported Seafood and Food Safety*. Pittsburgh, PA: Microbac Laboratories, Inc. 2011.
- <sup>11</sup>U.S. Food & Drug Administration. “FDA Prohibits Nitrofurantoin Drug Use in Food-Producing Animals.” Press Release, Animal & Veterinary. February 7, 2002. Available at: <http://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm137145.htm>.
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- <sup>13</sup>Baughman, 2011.
- <sup>14</sup>*Ibid.*
- <sup>15</sup>World Health Organization. “Use of Quinolones in Food Animals and Potential Impact on Human Health.” *Report and Proceedings of a WHO Meeting, Geneva, Switzerland*. June 2-5 1998.
- <sup>16</sup>Baughman, 2011.
- <sup>17</sup>U.S. Food & Drug Administration. “CPG Sec. 654.300 Chloramphenicol as an Unapproved New Animal Drug – Direct Reference Seizure Authority.” *Inspections, Compliance, Enforcement, and Criminal Investigations*. Issued April 12, 1988. Revised August 1996. Available at: <http://www.fda.gov/ICECI/ComplianceManuals/CompliancePolicyGuidanceManual/ucm074681.htm>.
- <sup>18</sup>U.S. National Oceanic and Atmospheric Administration (NOAA). “Fisheries of the United States 2012.” *Current Fishery Statistics No. 2012*. September 2013; U.S. Government Accountability Office. “Food Safety: FDA Can Better Oversee Food Imports by Assessing and Leveraging Other Countries’ Oversight Resources.” *Report to Congressional Requesters, GAO-12-933*. September 2012. At 5.
- <sup>19</sup>U.S. Food & Drug Administration. Memorandum: Final FY 2011 ORA Field Workplan. September 20, 2010.
- <sup>20</sup>Von Eschenbach, Andrew C. MD, 2008.
- <sup>21</sup>GAO, 2012.
- <sup>22</sup>GAO, 2012. At 2.
- <sup>23</sup>Love, David C. et al. “Veterinary drug residues in seafood inspected by the European Union, United States, Canada, and Japan from 2000 to 2009,” *Environmental Science and Technology*, 45(17). September 1, 2011. At 7234.
- <sup>24</sup>Food & Water Watch analysis of USDA FAS data and U.S. Census Bureau County Business Patterns data for North American Industry Classification 11411 Fishing. Available at: <http://www.census.gov/econ/cbp/>.
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- <sup>27</sup>Jones, Mitch. “Trading Away Our Safe Seafood,” *Food and Water Watch*. September 11, 2013. Available at <http://www.foodandwaterwatch.org/blogs/trading-away-our-safe-seafood/>. Citing a panel presentation by Dr. Carole Engle, Director, Aquaculture/Fisheries Center at the University of Arkansas at Pine Bluff.
- <sup>28</sup>Food & Water Watch analysis of USDA FAS data.
- <sup>29</sup>NOAA, 2013; NOAA. “Fisheries of the United States 2001.” September 2002.
- <sup>30</sup>Public Citizen. “The Trans-Pacific Partnership: Undermining Food Safety,” *Public Citizen*. 2014. Accessed on November 19 2014. Available at: <http://www.citizen.org/ppp-food-safety-facts>.
- <sup>31</sup>*Ibid.*
- <sup>32</sup>Gale & Buzby, 2009.
- <sup>33</sup>Siegner, Cathy. “Imports and Exports: How Safe is Seafood From Foreign Sources?” *Food Safety News*. November 11, 2013. Available at: <http://www.foodsafetynews.com/2013/11/imports-and-exports-how-safe-is-seafood-from-foreign-sources/#.VGux18l5p6Y>
- <sup>34</sup>Gale & Buzby, 2009. At 17.
- <sup>35</sup>Gale & Buzby, 2009.