

September 18, 2017

VIA Email

The Honorable Sonny Perdue  
Secretary  
United States Department of Agriculture  
1400 Independence Ave SW  
Washington, D.C.

Dear Secretary Perdue:

The undersigned members of the Food Industry Codex Coalition and other allied organizations are keenly interested in the international standard-setting activities of the Codex Alimentarius Commission. Recognizing Codex's critical role in protecting consumer health and ensuring fair trade, as well as Codex's unique standing in the World Trade Organization's Sanitary and Phytosanitary (SPS) Agreement, we applaud your commitment to Codex and welcome your recent decision to organize the U.S. Codex Office under the authority of the new USDA Under Secretary for Trade and Foreign Agricultural Affairs. This reorganization will elevate the visibility and strategic impact of U.S. Codex engagement and strengthen U.S. leadership in Codex to advance science-based global standards that protect public health and guard against unscientific barriers that impede U.S. food and agriculture trade.

U.S. industry long supported creation of the Under Secretary position as a multiagency coordinator for SPS measures and other nontariff trade barriers impacting U.S. food and agricultural exports. The Under Secretary's mission clearly links to the U.S. Codex Office's coordination role and Codex's dual mandate. We look forward to Under Secretary-designee Ted McKinney's confirmation and to further collaborating with USDA to ensure the U.S. Codex Office is fully resourced and reports directly to the Under Secretary. His leadership is vital to marshal full funding and political support for U.S. Codex Office engagement, international outreach, and capacity building that strengthens relationships with other Codex Member delegations. Such direct engagement by the Under Secretary will build momentum for U.S. Codex strategic priorities while clearly communicating the ongoing U.S. support for science-based food safety standards that are consistent with a rules-based trading system.

The undersigned organizations also wish to recognize the knowledge and expertise of the current U.S. Codex Office staff and U.S. delegates to Codex committees. Their input and continued engagement will provide critical institutional continuity as USDA realizes the benefits and efficiencies of the new organizational arrangement. It is also vital that USDA actively engage all relevant domestic and international stakeholders during the transition period, including U.S. agencies and technical delegates to various Codex committees. Such engagement will help all Codex stakeholders understand the goals and outcomes of the reorganization, reaffirm the U.S. commitment to science and food safety, and position the U.S. to enhance its leadership across Codex.

We greatly appreciate your leadership on this issue. U.S. Codex strategy must remain grounded in a clear, unimpeachable commitment to advancing science-based standards that enhance global food safety capacity. USDA has always championed Codex, and we are confident the new Under Secretary will ensure a strategic approach that allows the United States to meet current global challenges while continuing to ensure science-based Codex standards protect public health and facilitate trade.

Respectfully,

American Bakers Association  
American Beverage Association  
American Feed Industry Association  
American Frozen Food Institute  
American Peanut Council  
Biotechnology Innovation Organization  
California Canning Peach Association  
Calorie Control Council  
Corn Refiners Association  
CropLife America  
Council for Responsible Nutrition  
Distilled Spirits Council of the United States  
Flavor and Extract Manufacturers Association  
Grocery Manufacturers Association  
Infant Nutrition Council of America  
International Association of Color Manufacturers  
International Council of Beverage Associations  
International Dairy Foods Association  
International Food Additives Council  
Juice Products Association  
National Cattleman's Beef Association  
National Council of Farmer Cooperatives  
National Fisheries Institute  
National Grain and Feed Association  
National Institute of Oilseed Products  
National Milk Producers Federation  
National Oilseed Processors Association  
National Pork Producers Council  
National Sorghum Producers  
National Turkey Federation  
North American Export Grain Association  
North American Meat Institute  
North American Millers' Association  
Northwest Horticultural Council  
NSF International  
Pet Food Institute  
U.S. Apple Association  
U.S. Dairy Export Council  
U.S. Meat Export Federation  
U.S. Soybean Export Council  
United Fresh Produce Association  
Western Growers  
Wine Institute

CC: Scott Gottlieb, M.D., Commissioner, Food and Drug Administration  
Thomas E. Price, M.D., Secretary, Health and Human Services  
Scott Pruitt, Administrator, Environmental Protection Agency  
Wilbur L. Ross, Jr., Secretary, Department of Commerce