

August 5, 2015

Re: Request for Public Comments on the Initiation of an Out-of-cycle Review of South Africa's Eligibility for Benefits under the African Growth and Opportunity Act

Docket No. USTR-2015-0009

The National Cattlemen's Beef Association, North American Meat Institute, and U.S. Meat Export Federation, representing the U.S. beef industry, appreciate the opportunity to comment on the out-of-cycle review of the eligibility of South Africa to receive the benefits of the African Growth and Opportunity Act (AGOA).

It is well known that South Africa is a large and significant producer and exporter of beef. Over the past ten years South African beef production has increased 26 percent. During this same period, per capita consumption has increased by less than ten percent, but exports have grown by more than 500 percent and South Africa's self-sufficiency in beef has risen to over 100 percent. Nonetheless, opportunities exist at the upper end of the South African market for high quality U.S. grain-fed beef.

South Africa closed its market to U.S. beef exports following the first U.S. case of bovine spongiform encephalopathy (BSE) in December 2003. Since then most countries around the world that responded similarly to the 2003 case have reopened their markets on the basis of the BSE mitigation mechanisms that are in place in the United States. The World Organization for Animal Health (the OIE) also has recognized the steps the United States has taken to minimize the risk of future BSE cases by assigning the United States a "negligible risk" classification for BSE.

Notwithstanding the large body of scientific evidence supporting U.S. beef's safety, which has been determinative for the OIE and most beef trading countries, South Africa has chosen to keep its borders closed to U.S. beef. For South Africa to continue to be eligible for the benefits of AGOA, the President must determine through the out-of-cycle review that it has established or is making progress toward establishing the elimination of barriers to U.S. trade. Based on South Africa's track record on beef – nearly 12 years of denying access for U.S. beef in the face of overwhelming scientific evidence of the safety of our product - we would find it hard to understand how the President could make such a determination.

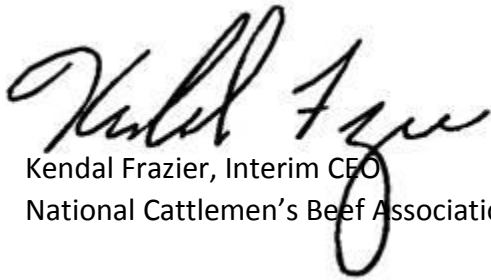
As a member of the World Trade Organization (WTO) South Africa has an obligation, when it chooses not to adopt international standards, such as those of the OIE, to base the animal health and food safety measures that it applies to imports on a scientific risk assessment. To our knowledge, South Africa has not conducted a scientific risk assessment of the safety of

importing U.S. beef, nor has it provided any other scientific rationale for banning imports of U.S. beef.

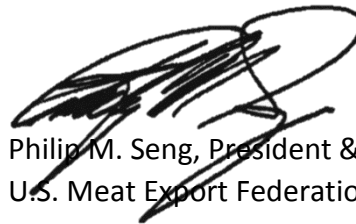
For the reasons given above, we strongly encourage the Office of the U.S. Trade Representative to capitalize on the opportunity afforded by the upcoming out-of-cycle review to engage the government of South Africa with the objective of securing a commitment from it to open its market to U.S. beef at the earliest possible date.

As always, please do not hesitate to let us know if we can assist in any way with your engagement with the government of South Africa.

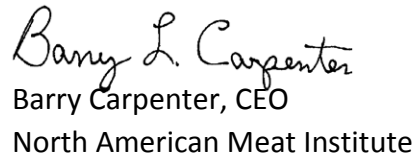
Sincerely,

A handwritten signature in black ink, appearing to read "Kendal Frazier".

Kendal Frazier, Interim CEO
National Cattlemen's Beef Association

A handwritten signature in black ink, appearing to read "Philip M. Seng".

Philip M. Seng, President & CEO
U.S. Meat Export Federation

A handwritten signature in black ink, appearing to read "Barry L. Carpenter".

Barry Carpenter, CEO
North American Meat Institute