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Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

COMMENT ON PROPOSED TRANSATLANTIC TRADE AND INVESTMENT AGREEMENT
Docket Number: USTR-2013-0019

Food Export-Northeast supports Transatlantic Trade and Investment Partnership negotiations with the European Union and urges USTR to especially seek the elimination of tariffs for all U.S. seafood products exported to EU member states. Food Export-Northeast is a non-profit organization composed of 10 Northeastern state agricultural promotion agencies that use federal, state and industry resources to help companies increase sales of their food products overseas. The economic vitality of the northeastern U.S. seafood industry depends on sales to the European Union.

According to FAO data, fish is one of the most widely traded commodities in the world and the European Union is the world's largest seafood market. Nearly 40% of world fish production enters the international market, much greater than for other major food staples, such as wheat (20%) and rice (5%). U.S. seafood exporters operate at a competitive disadvantage to other seafood suppliers. Most seafood products enter the United States duty-free while similar U.S. products face heavy tariffs when entering the EU.

Examples of major northeastern U.S. fisheries experiencing a competitive disadvantage:

- In 2012, total U.S. exports of American lobster were valued at \$491 million. Total sales of American lobster to the 27-member Europe Union were US\$162 million, representing 33% of total exports. The EU tariff applied to U.S. lobster products varies from 8% to 20%.
- In 2012, U.S. sea scallop exports totaled US\$193 million. EU markets accounted for US\$110 million and 57% of total export value. The EU tariff applied to U.S. sea scallop products is 8%.
- In 2012, U.S. monkfish exports were nearly US\$16.8 million. EU markets amounted to sales of US\$3.3 million and accounted for 20% of the total. The EU tariff applied to U.S. monkfish exports is 15%.
- In 2012, U.S. dogfish exports were nearly US\$19 million. Sales to EU markets were US\$9.2 million and 48% of total exports. The EU tariff applied to U.S. dogfish exports is 6%.
- In 2012, exports of U.S. skates and rays worldwide were nearly US\$18 million. U.S. exports to the EU were US\$10 million and represented 56% of total exports. The EU applies a tariff of 15% to U.S. product.

In all of these cases, the U.S. does not apply any tariff to the same or similar products.

EU markets are vital to distribute the vast production of U.S. lobster and scallops and EU markets also drive sales of seafood products lacking domestic consumption demand - such as monkfish, dogfish and skate. We urge USTR to push for the elimination of EU tariffs on all U.S. seafood products. The products listed above are highest priority. Eliminating EU tariffs for our region's fishery products will vastly improve the competitiveness of the small to medium-size companies that characterize the northeastern U.S. seafood industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Hamilton', with a long horizontal flourish extending to the right.

Tim Hamilton
Executive Director
Food Export USA-Northeast

CC: Linda Chaves
Senior Advisor for Seafood Industry and Trade
NOAA Fisheries