



National Fire Protection Association

1401 K Street NW, Suite 500, Washington, DC 20005
Phone: 202-898-0222 • Fax: 202-898-0044 • www.nfpa.org

May 10, 2013

Mr. Douglas Bell
Chair, Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

FR Doc No: 2013-07430

Dear Mr. Bell:

The National Fire Protection Association (NFPA) is a globally recognized leader in fire and life safety standards and expertise. In addition to being heavily cited in US regulations, NFPA codes and standards have been adopted throughout the world to protect life and property from fire and other hazards. Through our own initiatives and partnerships with other standards bodies, NFPA documents are available in 8 different languages. Over 20 different countries have adopted and/or referenced NFPA standards and we maintain offices on four continents to facilitate partnerships with those who use our standards. As a developer of international standards, we appreciate this opportunity to highlight several standards-related issues to consider for the pending Transatlantic Trade and Investment Partnership negotiations.

Calls for regulatory cooperation between our two governments in recent years have included commitments to consider international standards when pursuing regulatory measures (*e.g., Building Bridges Between the U.S and EU Standards System*). In determining which standards should be considered international, USTR should strongly encourage a policy that provides regulators the option to choose the highest quality standard to meet a particular need. As you are aware, the EU policy of designating only three standards development organizations as international standards bodies,¹ contrasts with the United States' more comprehensive view to include standards developed within a framework that adheres to WTO recognized principles for the development of international standards.² These principles, such as transparency, openness, impartiality, due process and consensus, are foundational to NFPA's standards development process. Our ANSI-accredited process involves the work of over 5,000 volunteer-experts, comprised of US and international participants, representing large companies as well as small and medium-sized enterprises, and the private and public sectors. This increasingly web-based process is open to input from NFPA members and interested members of the public anywhere in the world. The results of this process, high quality safety standards that meet the needs of the user community, should be available to regulators on both sides of the Atlantic.

¹ European Regulation on Standardization (EU) No 1025/2012

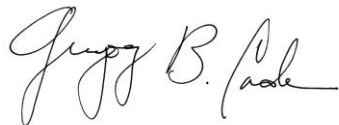
² World Trade Organization Technical Barriers to Trade G/TBT/ 1/Rev. 10, "Decision of the Committee on Principles for the Development of International Standards, Guides and Recommendations with Relation to Articles 2, 5 and Annex 3 of the Agreement."

The complexities of the modern standards environment, where products, standards, and codes can intersect in a number of ways, point to the need for open standard development processes that welcomes input from all stakeholders. Openness in the standards development process can facilitate coordination in trade and regulatory activity. Thus, USTR should seek to open avenues available to non-European interests to provide input to the European standards development process.

NFPA urges continued support for the US standards system as USTR negotiates the TTIP. The US standards strategy follows a bottom-up approach, in contrast to the EU's more centralized, top-down system. While each system developed to meet the needs of its user community, the decentralized, sector-driven process has enabled NFPA to fulfill an important public safety mission, be recognized for its world-class fire safety knowledge and expertise, and respond rapidly to new safety challenges. Under this system, NFPA standards have met the needs of users in the US and worldwide for over one hundred years.

Thank you again for this opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, reading "Gregory B. Cade". The signature is written in a cursive style with a large, stylized "G" and "C".

Gregory Cade
Director, Government Affairs
National Fire Protection Association