



May 10, 2013

The Honorable Demetrios Marantis
Acting United States Trade Representative
Office of the United States Trade Representative
Executive Office of the President
The Winder Building
600 Seventeenth Street, N.W.
Washington, D.C. 20508

**Re: Public Comment on Transatlantic Trade and Investment Partnership,
Docket No. USTR-20013-0019-0001 (April 1, 2013).**

Dear Ambassador Marantis:

The National Fisheries Institute (“NFI”) appreciates the opportunity to comment on the Office of the United States Trade Representative’s decision to enter into negotiations for a Transatlantic Trade and Investment Partnership (“TTIP”) with the European Union (the “EU”). NFI is the nation’s oldest and largest national seafood advocacy organization and represents the entire commercial seafood supply chain, including U.S. harvesters and processors who depend on reliable access to the 27 Member States of the European Union.

NFI applauds USTR’s willingness to negotiate a high-standards agreement for what is a large and critically important market for American seafood. The EU market is comprised of 504 million consumers. Because of the European demand for high quality, sustainably-produced finfish and shellfish, NFI member companies have been able to build a substantial export business in the EU-27. U.S. fish and fishmeal exports to the EU totaled nearly \$1.2 billion in 2012 – 21 percent of the overall \$5.7 billion in U.S. seafood exports.

These exports support American jobs and communities, often providing reliable employment in remote communities where other economic opportunity can be difficult to find. Coming as they do from what are widely regarded as the world’s best managed fisheries, U.S. seafood exports often have a competitive advantage among sustainability-conscious EU consumers. And they help feed the people of Europe, to the tune of hundreds of millions of meals to European families every year.

For these and other reasons, TTIP offers a tremendous opportunity for U.S. producers. That is why NFI supports a high-quality agreement that will liberalize tariff treatment of U.S. exports; resolve longstanding regulatory issues; achieve to the maximum extent possible regulatory harmonization across the Atlantic; and put in place a framework for prompt resolution of future disputes.

More specifically, NFI strongly suggests that USTR establish the following TTIP objectives concerning U.S. seafood exports:

1. Substantially liberalize and eliminate EU seafood tariffs and achieve duty free quota free treatment of U.S. pollock, hake, scallops, lobster, oysters, crab, surimi, and other products. NFI urges USTR to ensure that EU tariffs on these exports are permanently eliminated. The EU practice of using tariff suspensions or autonomous tariff quotas, though it allows for free trade in the near-term, creates a lack of predictability for harvesters and the processors and others in the supply chain who make these exports possible. Providing market access certainty for U.S. exporters would boost these producers and in turn ensure a more reliable supply of product for their European customers.
2. Resolve the lengthy regulatory dispute between EU food safety regulators and their FDA counterparts concerning food safety standards for molluscan shellfish. U.S. producers have been severely restricted in gaining access to the EU market because of unnecessary and unfounded regulatory measures imposed on U.S. exports by Brussels, at the behest of EU producers upset with FDA regulation of U.S. shellfish imports. NFI urges USTR to prioritize this issue, with the goal of restoring EU market access without compromising FDA and state shellfish oversight.
3. Identify and eliminate non-tariff barriers, particularly sanitary and phytosanitary measures aimed not at legitimate food safety objectives but rather the creation of stumbling blocks to U.S. exports. Unnecessary and unjustified SPS measures have proliferated during the global economic downturn in recent years, eroding the benefits of tariff reductions and hampering food industry efficiencies. This back door protectionism serves the global economy poorly, and USTR should address all such EU SPS measures as part of the negotiations.

Over the past decade, U.S. seafood exports to the EU have doubled. Permanent duty free, quota free treatment of those exports would stimulate additional EU demand for high quality, sustainably-harvested seafood products. In the process, this would spur greater investment in the U.S. commercial seafood industry and create economic opportunity for NFI member companies and their workers. For these reasons, NFI supports the imminent TTIP negotiations and looks forward to working with USTR to achieve these important goals.

Sincerely,



John P. Connelly
President