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May 10, 2013

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Subject: Transatlantic Trade and Investment Partnership (TTIP)  
Docket ID No.USTR-2013-0019-001

Neutronics Inc. is pleased to submit comments regarding future TTIP agreements with the EU.

The development of a TTIP agreement with Europe must give proper consideration to ensure fairness and reciprocity between partners. As demonstrated in the United States and Canada agreement, the following goals must be included.

- Eliminate barriers to trade in goods and services between trading partners;
- Facilitate conditions of fair competition within the free-trade area established by the Agreement;
- Significantly liberalize conditions for investment within that free-trade area;
- Establish effective procedures for the joint administration of the Agreement and the resolution of disputes;
- Lay the foundation for further bilateral and multilateral cooperation to expand and enhance the benefits of the Agreement.

Of these goals, the establishment of effective procedures for the joint administration of the Agreement and resolution of disputes stands out as an existing barrier to trade with the EU.

As an example, the EU Directive 2006/40/EC (17 May 2006) required Vehicle Manufacturers to use climate friendly refrigerants instead of the current R134a in some vehicles effective January 1, 2013 and all vehicles by January 1, 2017. While many vehicle manufacturers have complied with the Directive, Daimler has refused to comply. This, in and of itself, is not a trade issue however the fact that the EU has taken no action to enforce the directive is of significant concern.



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Domestic Vehicle Manufacturers selling vehicles in Europe are now placed at an economic disadvantage in Europe as they absorb a \$50 – \$100 cost increase to comply with the Directive. This economic advantage gained by the EU vehicle manufacturer is in direct conflict with the concept of free trade.

While this is one example, others exist related to the same Directive. Many US manufacturers have supported this directive with research, manufacturing facilities and inventory needed to allow the Directive to go forth. The failure of the EU to enforce the directive has caused severe financial harm to these US based companies.

In closing, we support the concept proposed by the TTIP however a fair playing field must be established to protect the investments made by US or EU trading partners.

Sincerely

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