



May 7, 2013

The Honorable Demetrios Marantis  
Acting United States Trade Representative  
Office of the United States Trade Representative  
600 17<sup>th</sup> Street, NW  
Washington, DC 20508

**Re: Docket No. USTR-2013-0019, Public Comment on  
Transatlantic Trade and Investment Partnership**

Dear Ambassador Marantis:

The At Sea Processors Association (APA) appreciates the opportunity to provide written comments on the United States Trade Representative's intent to enter into negotiations for a Transatlantic Trade and Investment Partnership (TTIP) with the European Union (EU). We understand the objective of this agreement is to increase transatlantic trade and investment, and we are fully supportive of this initiative's goals.

APA is a trade association composed of six (6) seafood companies that harvest and process seafood from fisheries off Alaska and the West Coast. The fisheries in which APA members participate account for more than half of all seafood landed annually in the U.S. Much of the seafood produced from these fisheries is exported. The EU market accounts for a substantial share of those exports—as high as 40% for some species. Overall, the EU is the U.S.'s largest seafood trading partner with seafood products valued at \$1.27 billion exported to the EU in 2011, representing 22% of all U.S. seafood exports.

Although APA companies have diverse fishing and fish processing operations, all six companies share one common characteristic. Each company operates catcher/processor vessels in the Nation's largest groundfish fisheries, including the Alaska pollock, Pacific whiting (hake), Pacific cod, and yellowfin sole fisheries. All of these fisheries are sustainably and responsibly managed fisheries and, therefore, provide a consistent supply of product to EU trading partners. APA members' catcher/processor operations employ 2,000 men and women with additional employment and economic activity generated by these companies through other vessel operations and through value-added processing operations.



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APA catcher/processor vessels produce seafood in a variety of product forms, including fillet, surimi, roe, and fish oil products. The table below provides the last 10 years of overall U.S. exports of three principal seafood exports—hake fillet and Alaska pollock fillet and surimi exports to the EU. (Note these data include overall U.S. exports and would include production for all segments of the U.S. industry, not just the production of APA members.) Alaska pollock products—both in fillet and surimi product forms—constitute the largest U.S. seafood export to the EU and alone account for roughly one-third the value of U.S. seafood exports to the EU.

Selected U.S. Fishery Exports to EU Countries							
	Hake		Pollock Fillets		Pollock Surimi		
	Mt	\$ (Mill)	Mt	\$ (Mill)	Mt	\$ (Mill)	
2002	7,278.3	\$ 10.2	72,211.4	\$ 155.4	15,573.3	\$ 30.1	
2003	12,455.3	\$ 14.2	68,078.4	\$ 127.1	16,664.8	\$ 28.6	
2004	21,191.2	\$ 30.9	90,737.2	\$ 186.3	21,284.4	\$ 31.8	
2005	17,181.4	\$ 31.7	75,164.9	\$ 170.6	31,208.3	\$ 58.4	
2006	17,008.4	\$ 34.2	80,750.1	\$ 218.7	17,679.5	\$ 35.4	
2007	15,294.7	\$ 29.8	86,058.4	\$ 247.3	12,098.4	\$ 21.5	
2008	12,541.0	\$ 27.3	69,042.3	\$ 239.0	16,972.2	\$ 34.9	
2009	9,398.7	\$ 22.2	53,691.7	\$ 186.8	8,182.7	\$ 16.5	
2010	12,551.7	\$ 34.8	59,575.5	\$ 205.9	10,967.9	\$ 27.3	
2011	15,718.6	\$ 38.3	96,272.1	\$ 304.5	28,724.6	\$ 60.6	
2012	11,232.0	\$ 37.2	65,961.0	\$ 207.8	33,255.0	\$ 78.8	
11 Year Total	151,851.3	\$ 310.8	817,543.0	\$ 2,249.4	212,611.1	\$ 423.9	
Average	13,804.7	\$ 28.3	74,322.1	\$ 204.5	19,328.3	\$ 38.5	

The products produced from these sustainably managed fisheries provide important economic and social benefits here in the U.S. and in the EU, as well. A very high percentage of our members' exported products are in product forms that require further processing within the European Union. This further processing is an important source of employment in many EU countries.

APA believes EU tariffs on our products should be permanently eliminated and we have supported that position in previous trade negotiations when a "zero-for-zero" outcome was desired. To date, the EU has implemented either tariff suspensions or autonomous tariff quotas to address their need for raw materials. However, such accommodations are subject to change and cannot be relied upon for future market access. The current approach creates


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uncertainty on the reliability of these markets for our members and for our customers who process our products in Europe. The current system also does not differentiate U.S. products from those of other nations such as Russia and China. Tariff elimination for U.S. products would obviate the need for these instruments and provide market access certainty for U.S. products, which have been harvested legally and arguably under what are widely regarded as the world's best, most sustainable fisheries management systems.

U.S. seafood exports to the EU have doubled over the past decade. APA strongly believes that unambiguous, permanent duty-free status of U.S. seafood products would further strengthen and grow trade between the U.S. and EU markets, meeting the stated objective of these negotiations. It would be positive for both U.S. and European income and employment and would help ensure European consumers' of a stable supply of healthful, sustainably-harvested seafood products.

Thank you for considering this public comment. APA looks forward to working with U.S. trade negotiators to achieve zero duties on seafood products through a Transatlantic Trade and Investment Partnership.

Sincerely,

A handwritten signature in black ink that reads "Stephanie D. Madsen". The signature is written in a cursive, slightly slanted style.

Stephanie Madsen  
Executive Director