

Subject: SERCOBE: public consultation on the EU-USA trade negotiations

Dear sirs,

SERCOBE is the Spanish National Association of Manufacturers of Capital Goods, being the business association of reference of an industry whose turnover in 2011 was of € 39.000 million and exports of € 31.000 million. At European level SERCOBE is member of CEOE (Spanish affiliate to BusinessEurope), while at European level SERCOBE is a ORGALIME member.

In the engineering industry, the launch of negotiations with the US with the aim to create an EU-USA free trade area can only be regarded as positive. However, the analysis of the current situation makes Spanish engineering companies to be afraid of the difficulties to get full advantage of a new FTA if certain obstacles to trade are not properly and timely removed. In the forthcoming negotiations, THE EU negotiators should arise an important and critical question: the dominant position held de facto by United Laboratories (known as UL) in the electrical equipment sector.

In order to get the UL certification, European companies have to depend on the availability and accuracy of the single provider: UL. Obtaining the UL certification involves high expenses and long lead times, what constitutes an important technical barrier preventing (not only) European companies from having fair access to the US market.

Therefore, SERCOBE has compiled quite a few number of records affected by the long procedures employed by UL to lease a certificate.

As member of ORGALIME SERCOBE is delighted to mention that we agree with the recent position paper related to EU-US trade relations.

Please find attached the draft position paper on the forthcoming EU-USA trade and economic negotiations.

In brief, Orgalime is the European Federation of Engineering Industries, and apart from being an active group of interests with regard to the common trade policy.

While globalization is evolving fast, it makes little sense to establish artificial barriers which distort competition. Some fo the 400 affiliated Spanish companies (mostly SMEs) have experiences delays and huge costs for getting the UL certification, The abovementioned obstacles do mainly apply to electrical engineering equipment and devices, MV devices and transformers.

SERCOBE is fully aligned with ORGALIME position paper and we want the attached position paper. Even though the public consultation expired, we believe that by transmitting this offensive point the negotiation point for the very best of the European engineering industry, its jobs, competitiveness and growth.

In the event of requiring consultancy, please feel free to contact me.

Kind regards,

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Director for Internal Market



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