



November 8, 2012

Office of the United States Trade Representative
600 17th Street N.W., Room 523
Washington, DC 20508
USA

Dear Sir/Madam:

RE: CBERA and/or CBTPA Eligibility for St. Kitts and Nevis ~ DOCKET # USTR-2012-0028

Reference is made to the official notification of the US Trade Representative's Office that was published in the *Federal Register/Vol. 77, No. 197/ Thursday, October 11, 2012/Notices* regarding the granting of certain trade benefits to Aruba, Curaçao, Sint Maarten, Turks and Caicos Islands, the Bahamas, Dominica, Grenada, Montserrat, St. Kitts and Nevis, and St. Vincent and the Grenadines.

I write on behalf of our company, PPC, to officially recommend that the Caribbean territory, St. Kitts and Nevis, be favorably considered by the Government of the United States of American for eligibility of expanded trade benefits under the Caribbean Basin Trade Partnership Act (CBTPA). Since 1983, St. Kitts and Nevis has been an active beneficiary country under the Caribbean Basin Initiative (CBI) and the Caribbean Basin Economic Recovery Act (CBERA). We wish to place on record that since 1997 our company has significantly benefitted from the CBI through our manufacturing investments in St. Kitts and Nevis via our subsidiary, Kajola Kristada Ltd, located in the C A Paul Southwell Industrial Estate, Basseterre, St. Kitts. Moreover, our company has had a positive, productive and co-operative relationship with the Government of St. Kitts and Nevis, and in particular, with the Ministry of International Trade, Industry and Commerce for the duration of our 15 years of operation in the Federation.

Our firm wishes to endorse St. Kitts and Nevis' eligibility for CBTPA benefits for several reasons, including but not limited to the following:

1. Enhancement of worldwide exports of goods produced by US investments overseas
2. Improvement in the Gross Domestic Product (GDP) of the USA
3. Increased foreign exchange earnings from trade expansion
4. Greater market access for US goods into the European Union, via direct shipment from St. Kitts and Nevis, made possible by trade pacts such as the Economic Partnership Agreements (EPA) [This is particularly important, given that the United States'-European Union (EU) Trade Agreement is yet to be negotiated.]

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Meanwhile, on the other hand, US firms based in St. Kitts and Nevis will be afforded an even greater opportunity under the CBTPA to heighten their corporate social responsibility (CSR) profiles in the territory, given the fact that such plants consistently make significant investments in the socio-economic development of the country, not limited to job creation and the provision of employment and career advancement to young, single parents who are pre-dominantly female and also heads of households.

Our firm is cognizant of the eligibility requirements for CBTPA benefits, and wishes to confirm, that based on our research, St. Kitts and Nevis has met all of the necessary criteria listed in Section 213(b)(5) (B) of the CBERA, as amended, and also Section 213(b)(4)(A)(ii) of CBERA (19 USC 2709(b)(4)(A)(ii)).

We trust that our submission will assist in the USTR's decision to approve St. Kitts and Nevis' eligibility for CBTPA trade benefits.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Geihe', with a long horizontal flourish extending to the right.

Wolfgang Geihe
VICE PRESIDENT, PPC WORLDWIDE OPERATIONS