

DOCKET NUMBER: USTR-2013-0019

May 10, 2013

**COMMENTS SUBMITTED BY THE PACIFIC SEAFOOD PROCESSORS  
ASSOCIATION REGARDING THE U.S. NEGOTIATING POSITION ON THE  
TRANSATLANTIC TRADE AND INVESTMENT PARTNERSHIP (TTIP) AS IT  
RELATES TO TRADE IN SEAFOOD PRODUCTS**

These comments are being submitted on behalf of the member companies of the Pacific Seafood Processors Association (PSPA). PSPA is a non-profit trade organization, founded in 1914, whose purpose is to foster a better understanding of the importance of the seafood industry to the U.S. economy and to the states where we operate. Our member firms purchase, process and market over three billion dollars worth of fishery products annually. Among the species we process are: salmon, halibut, cod, herring, pollock, whiting, and numerous species of crab. Over four billion pounds of seafood come from the waters off the Pacific Northwest and Alaska each year, and well over half of the nation's production of edible fishery products comes from this area. In addition to the edible products, large amounts of fishmeal and fish oil are produced as byproducts and used in the food, cosmetic and nutritional supplement sectors. These edible and non-edible products are sold both domestically and in scores of overseas markets. This activity contributes to the economic well-being of communities throughout the Northwest and Alaska, provides markets to hundreds of independent fishermen, and creates jobs for tens of thousands of processing workers.

We are committed to our nation's sound, proven and scientifically-based system of fishery management and enforcement. We support the goal of managing these public resources in a sustainable manner which will enable us to continue providing a healthful and nutritious source of protein to worldwide consumers on a long-term basis.

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Over the last twenty years, the total quantity and value of North Pacific seafood products being exported to the European Union has increased dramatically. The EU is now one of our largest and most important markets. This increase in exports has come about despite the fact that the EU still imposes several significant tariffs on our products. Without these tariffs, we are confident that our exports would be even higher. For this reason, and because the goal of free trade is generally beneficial to both parties, we recommend that the United States negotiating team seek a move to zero tariffs by both the United States and the Europeans as part of the TTIP talks. Most U.S. tariffs are already extremely low, or at zero. Conversely, EU tariffs for the products exported by our members are as high as 20 percent, with most being over 10 percent. For an industry like ours which deals with relatively low margins, these tariff levels present a real obstacle to increased export activity. Although it is true that some EU tariffs have been suspended on occasion and a number of tariff quotas have been established, this type of case-by-case tariff treatment is not ideal. It would be far better to lock in zero rates so that seafood producers on both sides of the Atlantic could plan their operations with more certainty.

We also wish to point out that should a zero for zero tariff agreement not be reached through the TTIP talks, the United States will be at a considerable disadvantage once Canada and the EU conclude their free trade agreement. U.S. seafood processors on both the east and west coasts produce many of the same products as our Canadian counterparts. Competing against them in the EU marketplace will be extremely difficult if we do not make significant progress in eliminating existing EU tariffs.

One other point we would like to make involves the historical treatment of seafood products as part of larger trade negotiations. It has sometimes appeared to the U.S. seafood industry that our interests may not always be defended as vigorously as are those of larger sectors. Our total exports may not be as high as those of some other U.S. industries, but we ask that seafood not become a bargaining chip in order to achieve the trade goals of other groups. Our exports are significant, we employ tens of thousands of workers, and our economic activity would likely increase if we get strong support from the U.S. negotiating team involved in the TTIP talks.

Thank you for the opportunity to submit these comments.

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