



May 10, 2013

Mr. Douglas Bell  
Chair, Trade Policy Staff Committee  
Office of the United States Trade Representative  
600 17th Street, N.W.  
Washington, DC 20508

Dear Mr. Bell,

On behalf of the American Association for Laboratory Accreditation (A2LA), the leading internationally recognized USA-based accreditation body, I am writing concerning the conformity assessment provisions of the Transatlantic Trade and Investment Agreement that is currently being negotiated between the USA and the European Union.

The trade agreement should encourage the use of the global accreditation infrastructure to facilitate acceptance of trans-Atlantic conformity assessment results: Specifically, endorsing the multilateral mutual recognition arrangements of the International Laboratory Accreditation Cooperation (ILAC MRA) and the International Accreditation Forum (IAF MLA) among accreditation bodies. Since Article 6.1.1 of the TBT Agreement encourages the use of accreditation to verify competence of conformity assessment bodies, the ILAC MRA and IAF MLA provides assurance of the competence of the accreditation bodies.

Furthermore, the concept of non-discriminatory treatment of accredited conformity assessment results can be more effectively realized in accordance with Article 6.4 of the *TBT Agreement*. Where any country within the scope of the agreement requires test results, certifications, and/or inspections as positive assurance that a product conforms to a standard or technical regulation of the importing country, it should not require the body testing or certifying the product or conducting an inspection to be located within its territory; or impose requirements on bodies located outside its territory that would effectively require such bodies to operate an office in the country of import. The countries should accept results from conformity assessment bodies accredited by an ILAC MRA signatory or IAF MLA signatory as applicable.

I would be pleased to respond to any questions or need for further information.

Sincerely,

Peter S. Unger  
President & CEO