

Mr. Douglas Bell
Chair, Trade Policy Staff Committee
Office of the US Trade Representative
Executive Office of the President
600 17th Street NW
Washington, DC 20508

Dear Sir

Request for comments concerning the proposed Transatlantic Trade and Investment Partnership.

Triumph Motorcycles (America) Ltd are the importers of the iconic Triumph brand of motorcycles built in the UK. We have achieved market share of 3.5% in the US and are on track to grow sales over 65% to 14,650 units in our Fiscal year ending June 2013 as compared to just two years ago.

We welcome the opportunity to respond to your request for comments on the proposed TTIP. Overall we feel that the TTIP will have a beneficial impact on the countries affected by such an agreement and that it will enable our respective states to continue to grow.

There are some points that we would like to be addressed in the coming negotiations and therefore detail these below.

1. Rules of Origin. It is usual practice for rules of origin to be based upon a certain percentage of local (EU) origin, this includes L+O/H and Profit. However we would like to propose that the "Change in Tariff Classification" method (CITC) is used instead, or at least as an alternative.

We have had experience across our Group of trying to apply the percentage rules and our findings are that they are hard to apply accurately, can change significantly in relation to colour splits, market variations and exchange rates etc and thereby require a large amount of admin to keep up to date. Furthermore the challenges around obtaining supplier documentary evidence to support origin has also proven to be a considerable challenge. In addition to this the global nature of sourcing, not just for cost but also local expertise or quality, means that the percentage method of RVC is being found to be irrelevant and hard to comply with.

By using the CITC method you ensure that actual manufacturing and assembly are carried out in the country concerned. This ensures local jobs and skills and encourages more local processes leading to investment not just in the plant itself but the service industries surrounding it.

2. A complete cut of duty rates relating to our areas of interest (Tariff codes 8711 20 through 50) would be recommended however this should be delivered over a phased introduction over 2 or 3 years.

3. Alignment of testing regimes / recognition of national standards. In short, there is no reciprocal recognition between the US and EC/UN technical regulations, and the system of approval is also poles apart.

In Europe, where EC and most United Nations regulations are accepted, everything is subject to witness testing by a government appointed type approval agency. In the US everything is self-certification subject to audit, with only exhaust emissions being subject to mandatory submission to the authorities.

The products that we sell, be it a bike or components, are always designed to pass the regulations of both regions where possible. It would be a significant step forward for all concerned, and that includes US manufacturers sending products to Europe as well as European products to the US, if the US could consider recognition of UN standards.

The amount of duplication and effort involved in the type approval for cross Atlantic trade would be minimised if mutual recognition procedures in relation to testing for automotive products were included as part of the TTIP and would be welcomed by all sides.

We trust you find the above points sufficiently detailed to consider for discussion and inclusion in the negotiations for the TTIP. If you would like any more details or information on our submission then please do not hesitate to contact me.

Yours faithfully,

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