



Protecting and advancing the interests of the candy, chocolate and gum industries since 1884

10 May 2013

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

*Submitted via: [www.regulations.gov](http://www.regulations.gov)*

**The US chocolate and confectionery industry's comments concerning  
the Proposed Trans-Atlantic Trade and Investment Partnership Agreement**

*Docket USTR-2013-0019*

This statement is submitted by the National Confectioners Association (NCA) in response to the request from the Office of the United States Trade Representative (USTR) for industry comments concerning the proposed Trans-Atlantic Trade and Investment Partnership (TTIP) agreement between the United States and the European Union. NCA and its members welcome the proposed TTIP and view the agreement as an important opportunity to remove barriers to sale of US exports of chocolate and confectionery to consumers in the European Union.

***Summary of NCA's Priorities in the Proposed TTIP***

In the TTIP, our industry's priorities focus on both low hanging fruit as well as barriers rooted in different regulatory approaches. Specifically, NCA considers that a successful US-EU FTA will include:

- Immediate elimination of EU tariffs on US-made products in line with other recently implemented EU FTAs. Tariffs are low-hanging fruit in this trade partnership, and duty-free access should be harvested quickly and without exclusions on our members' priority products.
- Removal of quota restrictions on trans-Atlantic trade in products of Chapter 18.
- Commercially relevant rules of origin that permit cumulation of products sourced from lesser developed countries.
- Progress to address long-standing regulatory barriers to US-made chocolate and confectionery. We are hopeful that the US-EU FTA can be a catalyst to tackle specific and significant barriers in the EU including warning labels on confectionery containing certain colors and mandatory GM labeling and traceability requirements.

**National Confectioners Association**

1101 30<sup>th</sup> Street NW, Suite 200, Washington, DC 20007  
Tel: (202) 534-1440 · Fax: (202) 337-0637 · Toll free: (800) 433-1200  
[www.CandyUSA.com](http://www.CandyUSA.com) · [info@CandyUSA.com](mailto:info@CandyUSA.com)

## ***Background on the US Chocolate and Confectionery Industry***

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Three hundred fifty companies, all members of the National Confectioners Association, manufacture more than 90% of the chocolate and confectionery products in the United States<sup>1</sup>. Another 250 companies supply those manufacturers.

NCA's members include large multi-national confectionery companies as well as small and medium-sized companies. The majority of NCA's members represent privately owned family businesses and many have been operated within the same family for multiple generations. Some NCA members have invested manufacturing operations in the United States as well as in various EU Member States. Many NCA members serve the EU market solely from domestic operations based in the United States.

The industry is represented in 35 states with particular manufacturing concentration in Pennsylvania, California, New Jersey, Illinois, New York, Wisconsin, Texas, Virginia, and Ohio. Approximately 70,000 jobs in the United States are directly involved in the manufacture of chocolate and confectionery products. When the distribution and sale of these products are taken into consideration, the beneficial effect for US employment triples.

The confectionery industry in the United States is a \$30 billion industry with worldwide export sales in 2012 totaling more than \$2.38 billion. In 2012, US export sales to the European Union of chewing gum, sugar confectionery and chocolate confectionery totaled \$62.68 million, the highest in averaged \$54.3 million, and of chocolate inputs and intermediate goods averaged \$8.3 million. For the same period, US imports from the European Union of chewing gum, sugar confectionery, chocolate confectionery and chocolate inputs totaled more than \$1 billion. For comparison, US exports to the European Union represented a mere 6% of the value of EU exports to the United States. The enormous gap in trade flows between the US and the EU are in large part attributable to the fact that EU confectionery products have relatively easy access into the United States market, whereas US-made confectionery faces a number of barriers that significantly limit US exports sales in the European Union.

For more than twenty years, NCA has advocated free trade. While US tariffs on our products are among the lowest in the world we continue to support an open market despite significant tariff barriers in important export markets and high raw materials costs at home resulting from protective sugar and dairy programs. Our industry pays 2 - 3 times the world price for sugar incurring millions of dollars in excess costs each year. Despite this cost disadvantage, our industry has never requested import protection and instead supports open markets and fair competition.

### ***The TTIP should eliminate tariffs and quotas on trans-Atlantic movement of goods and apply commercially-viable rules of origin***

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**Immediate, duty-free access for US imports into the European Union.** The European Union's continued reliance on Meursing codes, a complex and complicated tariff system based on agricultural components, makes for non-transparent tariff rates on imports of US-made chocolate and confectionery products. EU tariffs often include compound tariffs, agricultural components and quotas. The agricultural component is calculated based on percent quantity of the sugar, starch/glucose, milk proteins, and milk fats in the product. Even slight changes in product formulation may mean that tariffs applied on imports of US chocolate and confectionery may be higher or lower than previous shipments. Transparency, predictability and consistency should be achieved in the TTIP.

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<sup>1</sup> NCA's members manufacture intermediate cocoa inputs, chocolate, chewing gum, confectionery products and sugar-free confectionery products which are classified under HS headings 1704.10, 1704.90, 1803.10, 1803.20, 1804.00, 1805.00, 1806.10, 1806.31, 1806.32, 1806.90, 1905.31, 1905.32 and 2106.90.

We expect elimination of the compound tariff altogether and no application of tariffs based on agricultural components. Elimination of tariffs for *either* the industrial component *or* the agricultural component and not both would not be acceptable. As an example, in some EU FTAs, tariff preferences for confectionery and chocolate products are structured so that the industrial component (as an ad valorem tariff) is eliminated **but** the agricultural component remains: 0% + EA. This approach can be found in EU FTAs with Chile, South Africa, the EFTA countries, and in some Euro-Med agreements. Such an approach means that lack of transparency, lack of predictability and inconsistency continues, and that duty-free treatment is never achieved for products containing more than minimal quantities of sugar or dairy.

There is recent precedent, including under the EU-Korea FTA, where EU tariffs have gone to duty-free immediately upon entry for all chocolate products, chewing gum, and sugar confectionery products. In many instances, duty-free access is also applied to imports from FTA partners of Peru, Israel and Jordan. In short, the TTIP should be structured in line with those EU FTAs where immediate duty-free access and removal of the agricultural components on US-made chocolate and confectionery products imported into the European Union is achieved.

While we cannot estimate increases in US exports as a result of elimination of the Meursing system, US exporters would benefit from much improved transparency, predictability and consistency, while also reducing costs associated with determining rates actually applied on their US exports.

*Annex A* is a table that compares US MFN rates to the EU's MFN rate on NCA members' products which illustrates how open the US market is to European goods. EU tariff rates on finished confectionery range from 6.2% and may go as high as 24.2% *plus* the agricultural component. US tariff rates on finished confectionery range from duty-free to 6.4%. While 6.4% is the highest tariff rate applied on EU-made finished confectionery imported into the United States, 6.2% is the *starting point* for EU tariffs on US-made finished confectionery imported into the European Union. We expect the TTIP to eliminate the EU's high, complex tariffs.

**Remove all quotas on products of Chapter 18.** The United States and the European Union have quotas in place on various products of Chapter 18. In the US, the quotas are imposed on cocoa and chocolate inputs containing sugar and dairy. Imports from the EU of sweetened cocoa powder, bulk chocolate preparations and other chocolate materials are severely restricted, which restrains more integration between US and EU operations of NCA's members who are invested in both markets, as well as limits ability of smaller manufacturers to source cocoa and chocolate inputs from European suppliers in sufficient quantities. Duty-free/quota-free access for EU-origin inputs should be explored for Chapter 18 products falling under the dairy products quota in Chapter 4 Additional Note 10; the sugar blends quota in Chapter 17 Additional Note 8; and the cocoa, chocolate and low-fat crumb products quotas in Chapter 18 Additional Notes 1, 2 and 3.

In the EU, a nominal quota of 107 mt is in place for all products of Chapter 18, although the OQ duty is *de facto* the applied rate. In securing duty-free access for US-origin goods into the EU, our industry would expect no quantitative restrictions on any US-origin good in the TTIP.

**Rules of origin (ROO) should reflect commercial practice in the manufacture of cocoa, chocolate and confectionery products.** NCA believes that in order to negotiate a meaningful, substantial and truly liberalizing regional trade agreement under the TTIP, US trade negotiators must ensure that preferential rules of origin reflect how chocolate is processed and confectionery manufactured. It remains our number one priority to ensure that US-made chocolate and chocolate confectionery will benefit fully from any and all FTAs. Our industry supports preferential ROO that recognize that all US-manufactured finished

chocolate confectionery products of sub-headings 1806.31 / 32 / 90 may qualify for preferential access in FTA-markets; allow for global sourcing of critical intermediate inputs without restrictions; and recognize that each phase in the manufacture of chocolate and chocolate confectionery undergoes substantial transformation.

It is our position that the country of origin is determined by where the cocoa product, chocolate or confectionery product is processed. Below are the ROO endorsed by NCA as commercially viable for US manufacturers as well as for local, domestic manufacturers in foreign markets. In each phase of production, a new and different cocoa or chocolate product is created and substantial transformation has occurred. See *Annex B* for more details on processing and transformation of chocolate.

- *A change to heading 1801 from any other chapter.*
- *A change to headings 1802 through 1805 from any other heading.*  
Country of origin is where cocoa beans are processed into paste, butter or powder and where unsweetened cocoa powder is manufactured directly from paste.
- *A change to subheading 1806.10 from any other heading.*  
Country of origin is where the sweetened cocoa powder is made with no restrictions on the origin of sugar or cocoa powder.
- *A change to subheading 1806.20 from any other subheading.*  
Country of origin reflects the complex and complicated processes involved in the manufacture of bulk chocolate preparations.
- *A change to subheadings 1806.31 through 1806.90 from any other subheading, including any subheading within that group.*  
Country of origin is the country where finished confectionery is manufactured.

**Rules of origin should allow for originating status for sugar from lesser developed countries.** The United States and the European Union are global leaders in providing market access opportunities for lesser developed countries into their markets. The TTIP presents a unique situation in which the United States and the European Union could integrate initiatives to support lesser developed countries by liberalizing rules of origin to permit sugar sourced from LDCs to qualify as originating when used in the manufacture of cocoa inputs and intermediate goods of 1806.10 and 1806.20 traded across the Atlantic. While this would be a new approach for the United States to undertake, it signals bilateral cooperation in supporting LDCs, and establishes a new paradigm for free trade agreements that accounts for rules similar to “diagonal cumulation”.

#### ***The TTIP should address significant regulatory barriers in the EU market***

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While tariffs and quotas are low-hanging fruit that can easily be harvested in this proposed FTA, unless significant regulatory barriers are tackled, US exports will likely not reap the full benefits of reduced duties. In 2011, NCA provided comments to Department of Commerce on possible areas for regulatory cooperation between the European Union and United States. Specifically, our industry focused on two issues:

- Warning labels for certain colors, and
- Mandatory labels for GMOs and traceability requirements.

**US industry is hopeful that a US-EU FTA can achieve progress to rescind the requirement for warning labels for certain colors used in confectionery that are approved for use in the European Union and by many Governments around the world.** A number of NCA member companies use certified synthetic food colors in their confectionery products for the US and international markets. In 2010, the European Union implemented the Regulation on Food Additives (EC No. 1333/2008) which included as Article 24 the requirement that food containing any of six designated colors must be labeled with the statement “[name or E number of the color] may have an adverse effect on activity and attention

*in children.*” The warning statement effectively imposes a ban on the use of the following artificial colors: Tartrazine (E102), Quinoline Yellow (E104), Sunset Yellow (E110), Carmoisine (E122), Ponceau 4R (E124) and Allura Red (E129). These colors are widely used by the global food industry and have been the subject of safety reviews by the United Nations FAO/WHO Joint Expert Committee on Food Additives (JECFA). All have been assigned a numerical Acceptable Daily Intake (ADI) by JECFA which establishes the number of milligrams of the color an individual can consume per kilogram of body weight every day without adverse effect. The JECFA safety review and establishment of an ADI is necessary before the colors can be incorporated into the Codex General Standard for Food Additives. All the colors are approved for use in the European Union and by many Governments around the world.

Our industry remains concerned that such regulations undermine the science-based approach to food safety, and disadvantage US exports to the EU of chewing gum, sugar confectionery, chocolate and chocolate confectionery. Given the wide use by industry of these colors in confectionery US exports sales to the EU, could decline or stagnate. In addition, there is the cost for manufacturers to reformulate products with natural colors. US manufacturers face: a) immediate loss of sales during reformulation; b) increased costs of natural colors; c) potential decrease in product color consistency, stability, and vibrancy; and d) potential decrease in supply and availability of natural colors

**US industry also would like to see the US-EU FTA achieve progress in removing mandatory GMO labeling and traceability requirements.** As USTR is well aware, since 2004, all food products containing or consisting of GM ingredients must be labeled even if they no longer contain detectable traces of GM ingredients. For traceability purposes, food producers are also required to transmit and retain all information on GM products in order to identify both the supplier and the buyer of the GM product. Considering that US corn, sugar beets and soy are grown using modified seeds and that corn sweeteners, sugar and soy lecithin are basic ingredients of candy, most US produced candy require special labeling in the EU.

### ***Conclusion***

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Our industry requests that as part of the TTIP negotiations, the US Government advocate that the European Union respect and defend the principle of evidence based risk assessment and risk management to which both governments have committed in their own domestic regulatory processes and their goals for the Transatlantic Economic Council and other fora. The risk of undermining evidence/science based rulemaking goes far beyond the impact on transatlantic trade. It goes to whether the EU and the US will be able to sustain the credibility to advocate for transparent international standards that promote economic growth and human welfare.

On behalf of our members, we appreciate the opportunity to comment on the proposed TTIP, and outline NCA’s priorities on tariffs, quotas, rules of origin and continued US-EU regulatory cooperation on science-based risk assessment that can potentially reduce barriers to US exports of chewing gum, sugar confectionery, chocolate confectionery and cocoa inputs. The TTIP should ensure our US exporters can sell to European consumers and expand import market share in the European Union.

Sincerely,

Alison Bodor  
Executive Vice President

***Annex A:*** Table outlining EU and US tariffs and quotas on NCA members’ products

***Annex B:*** Chart outlining transformation processes of chocolate and chocolate preparations

***Attachment:*** Economic Profile of the US Chocolate and Confectionery Industry

## Annex A:

### Comparison of Current MFN Rates Applied in the European Union and United States on Confectionery and Chocolate Products

| Confectionery Product                          | HS Code | EU's 2013 MFN Rate  | US 2013 MFN Rate   |
|--|---------|---|--|
| CHEWING GUM                                    | 1704.10 | 6.2% to 6.3% +<br>range of 27.1 - 30.9 euro/100 kg <sup>a</sup>   | 4%   |
| SUGAR CONFECTIONERY                            | 1704.90 | 9% +EA, Max 18.7% + ADS/Z <sup>b, c</sup>   | 4.5% - 12.2% <sup>g</sup>  |
| COCOA PASTE                                    | 1803.00 | 9.6%  | 0% - 0.2¢/kg   |
| COCOA BUTTER/FAT/OIL                           | 1804.00 | 7.7%  | Free   |
| UNSWEETENED COCOA POWDER                       | 1805.00 | 8%  | 0.52¢/kg   |
| SWEETENED COCOA POWDER                         | 1806.10 | <b>Within Quota (107 mt):</b> 43%<br><br><b>Out of Quota:</b> 8% to 8% +<br>range of 25.2 - 41.9 euro/100 kg <sup>d</sup> | <b>Within Quota:</b><br>(Multiple TRQs in Chapters 4,17 and 18)<br>0% - 10%<br><br><b>Out of Quota:</b> 21.7¢/kg - 33.6¢/kg  |
| BULK CHOCOLATE                                 | 1806.20 | <b>Within Quota (107 mt):</b> 43%<br><br><b>Out of Quota:</b> 8.3% + EA,<br>Max 18.7% + ADS/Z <sup>b, e</sup>             | <b>Within Quota:</b><br>(Multiple TRQs in Chapters 4,17 and 18)<br>0% - 10%<br><br><b>Out of Quota:</b><br>Range of 37.2¢/kg to 52.8 ¢/kg<br>+ range of 4.3% to 8.5% |
| FILLED CHOCOLATE<br>CONFECTIONERY BARS         | 1806.31 | <b>Within Quota (107 mt):</b> 43%<br><br><b>Out of Quota:</b> 8.3% + EA,<br>Max 18.7% + ADS/Z <sup>b</sup>                | 5.6%   |
| UNFILLED CHOCOLATE<br>CONFECTIONERY BARS       | 1806.32 |   | 4.3% – 6%  |
| OTHER CHOCOLATE<br>CONFECTIONERY               | 1806.90 |   | 6%   |
| SWEET BISCUITS                                 | 1905.31 | 9% + EA,<br>Max 24.2% + AD S/Z <sup>f</sup>   | Free   |
| WAFFLES/WAFERS                                 | 1905.32 | 9% + EA,<br>Max 24.2% + AD S/Z <sup>f</sup>   | Free   |
| SUGAR-FREE CONFECTIONERY and<br>SUGAR-FREE GUM | 2106.90 | 2106.90.92.60<br>12.8%  | 2106.90.99.85<br>6.4%  |

#### Tariff Table Notes

- a) Gum has a maximum duty of 17.9 - 18.2%.
- b) Sugar confectionery, bulk chocolate, chocolate, sweet biscuits and waffles/wafers are charged an ad valorem duty plus an agricultural component (EA) to a maximum of 18.7% plus an additional duty based on sugar content (ADS/Z).
- c) The EU tariff on White Chocolate (1704.90.30) is 9.1% + 45.1 euro/100 kg, max 18.9% + 16.5 euro/100 kg. The EU tariff on licorice (1704.90.10) is 13.4%.
- d) The tariff on sweetened cocoa powder varies by the percentage of sucrose by weight: 0-5% = 8%; 5-65% = 8% + 25.2 euros/100 kg; 65-80% = 8% + 31.4 euros/kg; 80% or more = 8% + 41.9 euros/100 kg.
- e) Tariff on Chocolate Milk Crumb (1806.20.70) is 15.4% plus EA.
- f) Sweet biscuits and waffles/wafers are charged an ad valorem duty plus an agricultural component (EA) to a maximum of 24.2% plus an additional duty based on sugar content (ADS/Z).
- g) Cough drops (Tariff code 1704.90.25) enter the United States duty-free.

**Annex B:**

Transformation Processes of Chocolate and Chocolate Preparations

***Cocoa Beans (1801) to Cocoa Paste (1803), Cocoa Butter (1804) and Cocoa Powder (1805/1806.10)***

| Form   | HS Code | Composition Structure or Ingredient | Percent                        | Unit Operation | Transformation Processes and Uses   |
|--|---------|-------------------------------------|--------------------------------|----------------|---|
| COCOA PASTE (LIQUID)   | 1803.10 | NON-FAT SOLIDS<br>FAT               | 45<br>55                       | N/A            | N/A   |
| COCOA PASTE, PARTLY OR WHOLLY DE-FATTED (Solid disks, referred to as "presscakes") | 1803.20 | NON-FAT SOLIDS<br>FAT               | 76 to 90<br>10 to 24           | N/A            | Liquor heated to >200F and moisture added to melt fat crystals and gain the lowest viscosity possible. Paste is then hydraulically pressed using pressures >6000 psi into large disks (36 x 4 inches in size).<br><br><i>Not a retail consumer food.</i> May be used as an ingredient in industrial manufacturing or institutionally.                                 |
| COCOA BUTTER (LIQUID)  | 1804.00 | FAT                                 | 100                            | N/A            | Product of systematic, high-pressure hydraulic pressing. May be refined through further processing steps and steam treatment.<br><br>Generally used in making chocolate but can be directed toward other commercial uses such as cosmetics.   |
| COCOA POWDER   | 1805.00 | NON-FAT SOLIDS<br>FAT<br>MOISTURE   | 86 to 88<br>10 to 11<br>2 to 4 | N/A            | Presscakes are crushed, heated and milled through multiple steps to reduce particle size by at least 40%. Product is not yet in stable powder form. The product must then be heated and cooled in a very precise manner (called tempering) to create a stable powder with the optimum color, density and flowability.<br><br>Consumer use or sold for industrial use. |

***Continued on next page***

### **Chocolate Block (1806.20) to Finished Product (1806.31, 1806.32 or 1806.90)**

| Form  | Composition<br>Structure or<br>Ingredient   | Percent  | Unit<br>Operation      | Transformation Processes and Uses   |
|---|---|--|------------------------|---|
| CHOCOLATE BLOC<br>(> 10 LBS)                      | CHOCOLATE LIQUOR<br>COCOA BUTTER<br>SUGAR<br>MILK SOLIDS<br>FLAVORINGS<br>EMULSIFIERS | 10 to 16<br>12 to 20<br>45 to 55<br>10 to 26<br>0 to 3<br><1 | TRANSPORTING           | Block chocolate is between 27 and 35% fat, and the fat is the continuous phase of the block. To maintain its form it either has to be packaged in a defined space or has to be held at a cool temperature, below 80°F. The fat can either be tempered in its stable crystal form of 5 polymorphic forms, or an untempered solid.  |
|   |   |  | STORAGE                | The block must be stored at a cool temperature and low humidity, < 80°F and < 65% RH.   |
| CHOCOLATE CHIPS<br>(< 6" CHUNKS)                  |   |  | CHIPPER*               | Melting must be done at a relatively low temperature to avoid unwanted flavor development during a material handling process, typically between 100 and 145°F. Since the melt is low, to speed up operations the block is reduced in size to reduce the melt time.  |
| LIQUID<br>CHOCOLATE<br>(FLUID LIQUID)             |   |  | MELTER                 | Either in block or chip form, temperature is applied to the material, but as stated above, it is a relatively low temperature, 100 to 145°F. The heating elements need to be specially designed as not to produce localized hot spots. The milk protein will scale onto any high heat sources and will also change flavor. Agitation is also required at this stage.  |
|   | CHOCOLATE<br>COCOA BUTTER<br>EMULSIFIERS  | 96 to 100<br>0 to 3<br>0 to 1                                | MIXING                 | If the blocked chocolate exhibits viscosity problems, the yield is too high or low, or the fluidity is too high or low, adjustments need to be made prior to going to the bar line. Viscosity aids, such as additional cocoa butter, lecithin or other emulsifiers will be added at this stage.   |
| LIQUID<br>CHOCOLATE<br>TEMPERED<br>(PASTY LIQUID) |   |  | TEMPER                 | Control of crystal formation as the melted chocolate approaches finished goods is critical for the production of a stable, appealing consumer product. A tempering unit is a sophisticated, precision piece of machinery that controls crystal growth. The liquid chocolate is first cooled to 78 to 80°F, being careful not to totally solidify, because chocolate will solidify in an unstable form at these temperatures. Turbulent mixing is required throughout the tempering operation to make sure the total mass sees the same temperature at the same time. The crystal in liquid that is produced during this cooling step is then heated to 86 to 88°F to melt unstable crystal and maintain the stable crystal seeds. This temperature must be maintained for a significant amount of time to complete the remaining steps in producing a finished bar. The temperature cannot be raised since the stable crystal seeds will melt, and the temperature cannot be reduced because the chocolate will solidify throughout the system. |
|   | CHOCOLATE<br>INCLUSIONS   | 35 to 100<br>0 to 65   | INGREDIATION*          | Most chocolate bars contain inclusions or fillings. Viscosity, temper and proper mechanical action must be controlled during this step. Most inclusions are sensitive to mechanical action. The correct amount of agitation so as not to damage the inclusions, but maintain a uniform mix requires unique equipment design. Inclusions or fillings will change the whole flavor profile of the original chocolate melted from block.   |
|   |   |  | DEPOSITOR<br><i>or</i> | Disbursement of the tempered chocolate, with or without inclusions, out of the hopper requires weight control and mechanical actions that do not affect temper or the inclusions.   |
|   |   |  | ENROBING               | Enrobing requires a thin chocolate viscosity because the chocolate forms a curtain that covers pieces of confections. Viscosity and temper control are critical.  |
|   |   |  | MOULDING               | The chocolate is deposited into a fixed form, a mould. If the chocolate is not tempered it will never come out of this fixed form. The mould has to be temperature controlled. If the chocolate hits a cold mould, it will solidify too quickly and the form will never be filled properly. If the mould is too hot, it will detemper the chocolate.  |
| CHOCOLATE BAR<br>(SOLID)                          |   |  | COOLING                | Cooling is done in a very controlled fashion, typically in a cooling tunnel with zoned cooling. The first zone provides a moderate cooling, 55 to 60°F. The second zone is always colder than the first, approximately 50°F. The third zone is set slightly higher, 60 to 65°F, to minimize condensation and condition the bars for demoulding. Only if the right crystal formation has been maintained will the bar demould properly. Any fluctuation in temper will either cause the bar not to demould or have an undesirable appearance.  |

\* Optional process