

WEST COAST SEAFOOD PROCESSORS ASSOCIATION

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May 3, 2013*

Mr. David Weiner
Deputy Assistant USTR for Europe
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508
ATTN: Yvonne Jamison
Trade Policy Staff
Docket # USTR-2013-0019

Dear Mr. Weiner:

The following comments are provided on behalf of the West Coast Seafood Processors Association (WCSPA) in response to the April 1, 2013, *Federal Register* "Request for Comments Concerning Proposed Transatlantic Trade and Investment Agreement". WCSPA represents shore-based seafood processors and associated businesses in Washington, Oregon, and California. Among other things, our members purchase, process, and export cooked and frozen pink shrimp (*Pandalus jordani*) to European markets.

WCSPA has met with staff of USTR, testified at Congressional hearings, and provided information at hearings of the International Trade Commission on numerous occasions regarding the disparity in tariff rates and import quotas that the European Union (EU) has established on *P. jordani* and a similar species of cold water shrimp (*Pandalus borealis*) that is primarily harvested in Canada and the northeast Atlantic Ocean. Although there is a size differential between the two species (*P. jordani* are generally smaller), both enter into the same market channels and in many cases – due to processing methods – *P. jordani* are preferred by end users. Currently, the EU provides a duty-free quota of 30,000 mt per year for *P. borealis*; the quota for *P. jordani* (which was established this year for the first time after 20 years of effort) is 2,000 mt. For amounts above the quota, both species face a 20% duty.

The effect of this disparity is obvious: *P. borealis* enters market channels in large volumes at a duty-free price, essentially flooding the market. In order to compete, our members have to sell at a much reduced price which has upstream effects on the price we are able to pay to fishermen and on state revenues, as *ad valorem* landing taxes are lower than they should be. The disparity also effectively dampens market expansion in Europe.

The value of the shrimp fishery to the west coast states is significant. In 2012 in Oregon alone, 22,296 mt of *P. jordani* were landed at a dock-side value of \$24,685,293.00 (see: http://www.dfw.state.or.us/MRP/publications/docs/shrimp_newsletter2013.pdf). If we had the ability to sell shrimp in Europe at a competitive price, the dock-side price would also increase, as would revenues flowing to coastal communities, areas which tend to show among the larger unemployment rates on the west coast.

We recognize that there are a large number of trade issues to be resolved between the U.S. and the EU but we cannot emphasize enough the importance of the shrimp fishery to the west coast states. We request that you seek an end to the duty on *Pandalus jordani* or at least an equal duty-free import quota to that enjoyed by the non-U.S. suppliers of *Pandalus borealis*.

Sincerely,

A handwritten signature in black ink that reads "Rod Moore". The signature is written in a cursive style with a large initial "R" and "M".

Rod Moore
Executive Director