

# *The Coca-Cola Company*

WASHINGTON, D.C.

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May 10, 2013

Mr. Douglas Bell  
Chair, Trade Policy Staff Committee  
Office of the United States Trade Representative  
600 17th Street, NW  
Washington, DC 20506

**RE: USTR Docket Number USTR-2013-0019,  
Request for Comments on Proposed Transatlantic Trade and Investment Partnership**

Dear Mr. Bell:

The Coca-Cola Company is pleased to provide comments on the proposed Transatlantic Trade and Investment Partnership (TTIP) between the United States the European Union (EU).

The Coca-Cola Company strongly supports a TTIP that eliminates tariffs, reduces non-tariff trade barriers, encourages greater regulatory convergence, ensures strong protection for intellectual property rights (including trade secrets and trademarks), establishes a sound framework for protecting investment, and establishes a robust dispute settlement mechanism. Such an agreement between the world's largest trade and investor economies not only would yield direct economic benefits to our Company and the United States and the EU overall, but could also create a strong incentive for other economies to move in a similar direction, whether bilaterally, plurilaterally, or through the World Trade Organization.

The Coca-Cola Company has a specific interest in two areas. The first is tariffs. Our supply chain includes a host of inputs, including juices and others inputs. The Coca-Cola Company urges immediate tariff elimination on trans-Atlantic trade in these products. The appropriate HTS tariff numbers and descriptions are appended to this letter.

In addition, The Coca-Cola Company strongly supports the proposal being submitted by trade associations in the food and beverage industry that TTIP provide for recognition of the relevant, thorough, and similar scientific protocols by which the safety of flavors is reviewed, which ensure the safety of flavoring materials and related products, as well as a further acknowledgement that disclosure of product formulation for such products as a condition of market access is not required. Our global business depends on our ability to use and source a variety of flavors. Recognition that flavor materials approved as safe by one or more recognized and authoritative international body should be considered acceptable for use would significantly reduce the regulatory burden our Company and other manufacturers face today.

The Coca-Cola Company looks forward to working with U.S. negotiators as the TTIP process moves forward and to supporting a final TTIP agreement once concluded. If you should have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'MEchols', written over the word 'Sincerely,'.

Matt Echols

Vice President

Corporate Government Relations

**PRIORITIES FOR TTIP IMMEDIATE TARIFF ELIMINATION – THE COCA-COLA COMPANY**

| <b>Tariff Code List – Juice and Non-Juice Items</b>                                    |   |  |   |
|--|---|--|---|
| <b>Juices Items</b>  |   |  | <b>Non-Juice Items</b>  |
| <b>Description</b>   | <b>HTS Number (EU)</b>  |  | <b>Description</b>  |
|  |   |  | <b>HTS Number (EU)</b>  |
| Tomatoes prepared or preserved otherwise than by vinegar or acetic acid                | 2002 9011; 9019; 9031; 9039; 9091; 9099                                     |  | Milk and cream, concentrated or containing added sugar or other sweetening matter       |
| Jams, fruit jellies, marmalades, fruit or nut puree ..... Homogenised                  | 2007 1010; 1091; 1099   |  | In powder, granules or other solid forms, of a fat content by weight not exceeding 1.5% |
| ..... Citrus Fruit   | 2007 9110; 9130; 9190   |  | In powder, granules or other solid forms of a fat content by weight exceeding 1.5%      |
| ..... Other  | 2007 9931; 9933; 9935; 9939; 9950; 9993; 9997                               |  | Other not containing sugar or other sweetening matter                                   |
| Fruit, nuts and other edible parts of plants ..... Not specified elsewhere - Pineapple | 2008 2011; 2019; 2031; 2039; 2051; 2059; 2071; 2079; 2090                   |  | Other   |
| ..... Citrus Fruit   | 2008 3011; 3019; 3031; 3039; 3051; 3055; 3059; 3071; 3075; 3079; 3090       |  | Yogurt  |
| ..... Pears  | 2008 4011; 4019; 4021; 4029; 4031; 4039; 4051; 4059; 4071; 4079; 4090       |  | Not flavored nor containing added fruit, nuts or cocoa:                                 |
| ..... Apricots   | 2008 5011; 5019; 5031; 5039; 5051; 5059; 5061; 5069; 5071; 5079; 5092; 5098 |  | Flavored or containing added fruits, nuts or cocoa:                                     |
| ..... Cherries   | 2008 6011; 6019; 6031; 6039; 6050; 6060; 6070; 6090                         |  | Not flavored in powder, granules or other solid form:                                   |

|                                     |   |  |   |   |
|-------------------------------------|---|--|---|---|
| ..... Peaches, including nectarines | 2008 7011; 7019; 7031; 7039; 7051; 7059; 7061; 7069; 7071; 7079; 7092; 7098   |  | Flavored in powder, granules or other solid form:   | 0403 9071; 9073; 9079; 9091; 9093; 9099   |
| ..... Strawberries                  | 2008 8011; 8019; 8031; 8039; 8050; 8070; 8090;  |  | Whey, whether or not concentrated or containing added sugar or other sweetening matter; products consisting of natural milk constituents, whether or not containing added sugar or other sweetening matter not elsewhere specified or included: |   |
| ..... Cranberries                   | 2008 9311; 9319; 9321; 9329; 9391; 9393; 9399   |  | Whey and modified whey:   | 0404 1002; 1004; 1006; 1012; 1014; 1016; 1026; 1028; 1032; 1034; 1036; 1038; 1048; 1052; 1054; 1056; 1058; 1062; 1072; 1074; 1076; 1078; 1082; 1084 |
| ..... Mixtures:                     | 2008 9712; 9714; 9716; 9718; 9732; 9734; 9736; 9738; 9751; 9751; 9759; 9772; 9774; 9776; 9778; 9792; 9793; 9794; 9796; 9797; 9798                                     |  | Other   | 0404 9021; 9023; 9029; 9081; 9083; 9089   |
| ..... Other                         | 2008 9911; 9919; 9921; 9923; 9924; 9928; 9931; 9931; 9934; 9936; 9937; 9938; 9940; 9941; 9943; 9945; 9948; 9949; 9951; 9963; 9963; 9967; 9972; 9978; 9985; 9991; 9999 |  | Natural Honey   | 0409  |
| Tomato juice:                       | 2009 0510; 0590   |  | Coffee  | 0901  |
| Cranberry                           | 2009 8111; 8119; 8131; 8151; 8159; 8195; 8199   |  | Tea   | 0902  |

|  |   |  |   |            |
|--|---|--|---|------------|
| Food preparations not elsewhere specified - Protein concentrates and textured protein substances | 2106 1020; 1080                         |  | Coffee/tea extracts   | 2101       |
| - Other  | 2106 9092; 9098                         |  | Provitamins, Vitamins and Hormones  | 2936       |
| Fruit juices or other fruits...  |   |  | Essential oils (terpeneless or not), including concretes and absolutes; resinoids; extracted oleoresins; concentrates of essential oils in fats, in fixed oils, in waxes or the like, obtained by enfleurage or maceration; terpenic by-products of the deterpenation of essential oils; aqueous distillates and aqueous solutions of essential oils: | 3301 – all |
| Frozen orange juice  | 2009 1100; 1111; 1119; 1191; 1199       |  | Prepared binders for foundry moulds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included:<br>Other: Other  | 3824.90.97 |
| Other  | 2009 1911; 1919; 1991; 1998             |  | Aluminum  | 7601 – all |
| Orange Juice not Frozen of a brix value not exceeding 20   | 2009 1200                               |  |   |            |
| Grapefruit juice – Brix not exceeding 20   | 2009 2100                               |  |   |            |
| Grapefruit juice – other   | 2009 2900; 2911; 2919; 2991; 2999       |  |   |            |
| Other citric juice – Brix not exceeding 20   | 2009 3111; 3119; 3151; 3159; 3191; 3199 |  |   |            |

|   |   |  |  |  |
|---|---|--|--|--|
| Other citric juice  | 2009 3911; 3119;<br>3131; 3139; 3151;<br>3155; 3159; 3191;<br>3195; 3199  |  |  |  |
| Pineapple juice – Brix not exceeding 20                       | 2009 4192; 4199   |  |  |  |
| Pineapple juice -- other                                      | 2009 4911; 4919;<br>4930; 4991; 4993;<br>4999   |  |  |  |
| Grape juice – Brix not exceeding 30                           | 2009 6110; 6190   |  |  |  |
| Grape juice -- other  | 2009 6911; 6919;<br>6951; 6959; 6971;<br>6979; 6990   |  |  |  |
| Apple juice – Brix not exceeding 20                           | 2009 7120; 7199   |  |  |  |
| Apple juice -- other  | 2009 7911; 7919;<br>7930; 7991; 7998  |  |  |  |
| Other fruit juices or fruit, vegetable                        | 2009 8911; 8919;<br>8934; 8935; 8936;<br>8938; 8950; 8961;<br>8963; 8969; 8971;<br>8973; 8979; 8985;<br>8986; 8988; 8989;<br>8996; 8997; 8999 |  |  |  |
| Juice mix   | 2009 90 -- all  |  |  |  |
| Vegetable materials and waste, residues and by-products ..... | 2308: 0011; 0019;<br>0040; 0090   |  |  |  |
|   |   |  |  |  |