

U.S. Department of Commerce Forest Products and Building Materials and Chemicals and Allied Products Roundtable (11/7/2003)

The International Trade Administration and Technology Administration hosted the Forest Products and Building Materials and Chemicals and Allied Products Roundtable on November 7. Linda M. Conlin, Assistant Secretary for Trade Development in the International Trade Administration, and Dr. Belinda Collins, Deputy Director for Technology Services at the National Institute of Standards and Technology (NIST) in Technology Administration co-hosted the roundtable. Robert Reiley, Director of the Office of Metals, Materials and Chemicals moderated the roundtable.

Assistant Secretary Conlin stressed the importance of bringing all DOC and other Federal Government resources together to focus on standards and pointed to the appointment of Heidi Hijikata, ITA's new Standards Coordinator, as an example of Secretary Evans' commitment to work with industry on standards issues, particularly those that impact U.S. industry competitiveness. Dr. Collins outlined Secretary Evans' Eight-Point Standards Initiative and provided examples of actions undertaken by the DOC to date. Mr. Reiley encouraged the roundtable participants to engage in consistent dialogue with DOC industry representatives

Following introductory remarks, the roundtable moderator, Robert Reiley, called upon each of the industry representatives for comments. Below is a summary of their remarks.

A. Forest Products and Building Materials

The National Association of Home Builders (NAHB) - Presenter - Chris Fennell from the NAHB Research Center

NAHB is a Washington, D.C.-based trade association whose mission is to enhance the climate for housing and the building industry. Chief among NAHB's goals is providing and expanding opportunities for all consumers to have safe, decent and affordable housing. As the voice of America's housing industry, NAHB helps promote policies that will keep housing a national priority.

Founded in 1942, NAHB is a federation of more than 800 state and local associations. About one-third of NAHB's 211,000 members are homebuilders and/or remodelers. The remaining members are associates working in closely related fields within the housing industry, such as mortgage finance and building products and services. The association is member-driven, with a professional staff of nearly 300. More than 2,800 members serve on the association's board of directors, which elects the association's Senior Officers and helps set the association's agenda.

NAHB analyzes policy issues, takes the industry's story to the public, monitors and works toward improving the housing finance system, and analyzes and forecasts economic trends. The association also represents the industry's interests on Capitol Hill and strives to ensure that housing remains a national priority when laws are made and policies are established. In 2003, NAHB's builder members will construct about 80 percent of all new housing in America, making housing one of the largest and most powerful engines of economic growth in the country.

Mr. Fennell opened his presentation by stating a lack of standards is not the most critical issue for builders. The lack of understanding about standards compatibility and comparability combined with a lack of awareness of technical requirements is the number one issue for builders in international markets.

- o There is often a lack of a central "information clearinghouse" for technical information. The ideal clearinghouse would be administered by an organization with technical personnel that have a broad base of U.S. and international expertise and do not have a vested interest in a specific building product or system (e.g. wood/steel/concrete).

- o An important role that the Department of Commerce has addressed in the past and should continue to focus on as a high priority in the future is educating builders and other decision makers at home and abroad about technical requirements and the regulatory environment.

- o A lack of coordinated guidance and information often forces U.S. builders to learn on their own through expensive and time-consuming trial and error. For example, only Pulte remains active on a large scale in Mexico. At various times over the last ten years, Ryland, US Home, KB, and Centex among others have established operations in Mexico and subsequently withdrawn. A combination of technical and non-technical issues makes the learning curve steep and difficult.

Builders are systems integrators that sell homes not products. In the U.S. and abroad, builders expect building product manufacturers to carry the burden for meeting technical requirements and demonstrating product conformance.

Code officials abroad sometimes but not always recognize the ICC-ES evaluation report process that works in the U.S. Increasing reciprocity between countries for product evaluation reports would increase U.S. building product usage abroad and reduce the risk and uncertainty for U.S. builders.

- o In contrast, reciprocity between testing labs that evaluate performance characteristics of building products is widespread. For example, because the NAHB Research Center conforms to ISO 17025, our test results are recognized and accepted by regulators in more than 50 countries.

- o Independent product conformance systems in the U.S. including product labeling or certification (e.g. UL or Factory Mutual) and grade stamps (e.g. WWPA or APA), gives builders, contractors, architects, engineers, building officials, and homebuyers confidence in the products and systems that are used to design and build their homes. The use of counterfeit or misleading grade stamps can seriously damage product acceptance in new markets.

An effective technique used in the U.S. to accelerate the adoption of innovative home building materials is to create standardized performance specifications or a prescriptive design guide. This approach eliminates the need for individualized design and engineering of each home.

- o For example, in the U.S., a Prescriptive Method was developed for the design, specification, and installation of light-gauge cold-formed steel in residential construction. Though still capturing only a small share of the overall structural framing market in the U.S., this approach has helped make the use of steel framing in residential construction a viable, mainstream alternative for builders. The same approach could be taken in foreign markets, such as China, where there is currently a lack of technical information and building code recognition for steel framing. Training and information dissemination programs could then be conducted to educate designers, builders, regulators, and perhaps home buyers.

- o NAHB General Approach to Standards:

- o Prefer technical, process- or performance-based standards vs. prescriptive or other non-technical based approaches.

- o Favor transparent standards-setting process based on scientific principles.

- o Confirm that standards benefit trade as a result of facilitation and acceptance across borders.

- o Specific Issues of Concerns:

- o Regulatory standards that include criteria such as socio-economic interests, environmental justice, public right to know, etc.

- o International decision-making process which privileges majority rule.

- o Desired Government Assistance:

- o Use trade analysts' expertise to bring macroeconomics perspectives to U.S. negotiating position and balance other agencies' approach.

- o Improve country-based information related to specific markets and/or products.

- o Influence international negotiating process and limit EU's leverage.

The American Forest and Paper Association (AF&PA) - Presenter Peter Mazikins

AF&PA is both one of the youngest and one of the oldest major trade groups in the nation. AF&PA was founded January 1, 1993, evolving from predecessor groups dating as far back as the mid-1800. Immediately prior to the founding of AF&PA, the forest products industry was represented by two organizations - the National Forest Products Association (NFPA) and the American Paper Institute (API) - each independent institution with some common membership. NFPA and API represented distinct sectors of the industry, with the former being the agent for the forest and building products industries while the latter represented pulp, paper, and paperboard manufacturers.

Speaking of behalf of AF&PA's Subcommittee on International Standards, Mr. Mazikins welcomed the opportunity to participate in this industry roundtable. During this presentation, Mr. Mazikins outlined the industry's priority standards issues in foreign markets. These issues, specific to standards and technical regulations, were identified in an attached table and highlighted some of the standards barriers that our sector faces in major export markets. In addition, Mr. Mazikins offered the following comments with respect to the Initiative:

- o Continued coordination with other federal agencies is of the utmost importance. The Initiative needs to contemplate creation of some effective, on-going entity to maintain standards

coordination across federal agencies beyond this initial fact-finding phase. We believe an inter-agency Task Force with a mandate to coordinate all standards issues across the government would be an appropriate forum for such coordination.

- o AF&PA supports the reinforcement of expertise in key markets through training programs for standards liaisons posted abroad. However, there are a number of private-sector standards organizations that have already developed such training programs and thus the federal government should not expend additional time and effort duplicating what already exists, as private-sector training offerings have generally already been determined to be consistent with American industry's objectives. Instead, we recommend that the Department of Commerce ensure that internal training programs are consistent. U.S. standards development organizations that already have training programs in place (e.g. ANSI, ASTM) should be engaged in assisting with providing the training and having their existing programs used.

- o AF&PA welcomed the appointment of a new position within the International Trade Administration to ensure that the industry's standards priorities are promoted consistently. However the breadth of standards activities impacting trade across all U.S. goods and services is extensive and as such consideration should be given to broadening the liaison program to include government standards "experts" affiliated with each industrial sector. These experts should be available as a resource dealing with sector-specific global standards issues.

Opportunities to Reduce Barriers to Trade - Mr. Mazikins concluded by stating that in preparation for the 5th World Trade Organization Ministerial, the U.S. forest products industry identified a number of negotiating opportunities aimed at the reduction or elimination of NTBs. Sector-specific discussions for the forest products sector, in the area of technical regulations such as building codes, pose a real opportunity for fruitful discussion that, if successful, could provide meaningful progress toward achieving free and fair trade in the forest products sector.

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- o Specific Issues of Concerns:

- o Regulatory standards that include criteria such as socio-economic interests, environmental justice, public right to know, etc.

- o International decision-making process which privileges majority rule.

- o European influence and its favoring of detailed, prescriptive regulations and eco-labeling regimes that favor EU producers

- o Desired Government Assistance:

- o Use trade analysts' expertise to bring macroeconomics perspectives to U.S. negotiating position and balance other agencies' approach.

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The Kitchen Cabinet Manufacturers Association (KCMA) - Presenter Dick Titus.

The Kitchen Manufacturers Association is the national trade association that serves and represents kitchen, bath and other residential cabinet manufacturers and suppliers. The association consists of over 360 North American producers. The KCMA's purpose is to serve members by promoting the industry; developing standards; sponsoring research; representing member interests in government, legislative and regulatory issues; and providing management tools and educational programs. The association's goal is to promote growth for the entire cabinet industry, offer a package of services designed to strengthen individual members, and to grow as an association.

Since KCMA is an association member of the AF&PA, the association firms are affected by many of the same standards issues addressed by Mr. Mazikins. Therefore, Mr. Titus did not reiterate much of the information contained in the AF&PA presentation. Mr. Titus spoke on KCMA's work to create international, performance-based standards for kitchen cabinets. Historically, standards for kitchen and related cabinets have been based more on prescriptive, appearance-oriented specifications without taking into consideration specific, technical requirements. However, over the past decade, the industry has been working with both domestic and foreign building material specifiers and builders on the design, development, and implementation of performance-based standards.

Most recently, Mr. Titus and several U.S. kitchen cabinet manufacturers traveled to China to meet with building materials enterprises (like Lowe's and Home Depot), Chinese builders and developers, and Chinese Government officials to discuss the development of the Chinese home building sector and the product standards being used in Chinese home construction, especially in the area of interior design and product specification.

It was evident from the exchanges with their Chinese counterparts, that there are currently no performance-based standards in place in China to address these issues. Mr. Titus indicated that the issues are as much for performance and quality as they are for the protection of both builders and homeowners.

Mr. Titus continued by stating that the industry has a number of concerns relating to a program known as the LEED program. LEED is the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program. LEED is a relatively robust green building standard that has been welcomed by a significant number of builders, architects, institutions (notably universities) and even U.S. federal, state and municipal governments. In this country, there are 62 certified LEED projects and 852 registered projects accounting for approximately 10 million square meters of gross floor area.

According to Mr. Titus, increasingly, the LEED credit concept is gaining notoriety overseas, with registered projects in Canada, China, India and Spain and inroads made in Australia, France, and Japan. While the concept of creating an environmentally friendly, sustainable building standard is laudable and creates opportunities for an assortment of U.S. firms involved in the building industry, Mr. Titus indicated that there are problems inherent in the LEED

standard that are a threat to U.S. wood producers, and a potential trade barrier for all U.S. exporters of building products in the future.

The U.S. forest products industry depends upon the premise of using Voluntary Product Standards in the production, consumption, and utilization of their products. Domestic and foreign building officials in assuring the structural stability of a structure often cite these standards. In the mid-1990s, an effort was made through the ASTM in developing a voluntary consensus standard for sustainability.

Unfortunately this effort failed and thus launched the U.S. Green Building Council's LEED system. According to the U.S. GBC's website, LEED is a "voluntary, consensus-based national standard for developing high-performance, sustainable buildings." Mr. Titus believes that this is a false statement because while LEED may be consensus-driven, it is not a "voluntary consensus-based" national standard under the definition of what constitutes a "consensus-based" standard in this country.

Mr. Titus outlined the LEED program and some of the controversial areas associated with the program. The LEED program awards points in five main categories: Sustainable Sites; Water Efficiency; Energy & Atmosphere; Materials & Resources; Indoor Environmental Quality. A building can become LEED certified if a building has at least 26 points, with additional status such as "Silver," "Gold," and "Platinum" if the building exceeds 32 points. It is the Materials & Resources category most troubling to AF&PA, KCMA, and other wood based associations.

Mr. Titus said that from the work done by the industry, U.S. officials have identified that the LEED credit concept points out four main areas of concern: (1) recycled content, (2) regional materials, (3) rapidly renewable materials and (4) discriminatory use of certification regimes. Mr. Titus then highlighted the issues surrounding these four areas:

Recycled Content

Intent is "increase demand for building products that incorporate recycled content materials, therefore reducing impacts resulting from extraction and processing of new virgin materials." A building is eligible for one credit if the aggregate of all materials contain 20% post-consumer or 40% post-industrial recycled content.

Problem: This credit favors non-renewable materials over a renewable material such as wood. Steel is recycled, but steel requires approximately 66% more energy than wood to produce.

Regional Materials

Intent is "increase demand for building materials and products that extracted and manufactured within the region, thereby supporting the regional economy and reducing the environmental impacts resulting from transportation." One can receive a credit if a project uses a minimum of 20% of building materials and products manufactured within a radius of 500 miles of the building site. An additional credit is won if the content is increased to 50%.

Problem: The distance requirement is completely arbitrary and environmentally specious. From a trade perspective, if LEED continues to be internationalized, this could potentially become a serious trade barrier for U.S. exporters. The environmental justification of reducing fuel costs and fuel damage to the environment ignores the environmental impact of how the product is manufactured.

Rapidly Renewable Materials

Intent is to "reduce the use and depletion of finite raw materials and long-cycle renewable materials by replacing them with rapidly renewable materials." Requires using rapidly renewable building materials (made from plants that are typically harvested within a 10 year cycle or shorter) for 5% of the total value of all building materials and products.

Problem: Credit suggests that planted or natural forests are environmentally inferior to agricultural or "short-rotation" items such as bamboo and wheatgrass. However, forest production as opposed to agricultural commodities disturbs less land, and produces more volume on fewer acres at lower per unit costs.

Discriminatory Use of Certification Regimes

Intent is to "encourage environmentally responsible forest management." Use a minimum of 50% of wood-based materials and products certified in accordance with the Forest Stewardship Council's (FSC) Principles and Criteria for wood building components.

Problem: Discriminates against the majority of certified forests in this country and the world. The credit ignores the largest certification scheme in North America, the Sustainable Forest Initiative (SFI), accounting for 44% of certified forests, as well as the American Tree Farm System (27%), and the Canadian Standards Association (21%). Globally, FSC certified forests account for just fewer than 3% of total forestry area.

Mr. Titus concluded by indicating that the industry and its overseas representatives are in the best technical position in gauging how the LEED system is affecting their business. However, Commerce and other appropriate USG agencies should continue work with the leadership of the U.S. GBC in providing greater transparency that may ultimately foster a true voluntary consensus standard.

The Manufactured Housing Research Alliance - Presenter Emmanuel Levy.

The Manufactured Housing Research Alliance (MHRA) is a non-profit organization with the mission of developing new technologies to enhance the value, quality, and performance of the nation's manufactured homes. MHRA's research supports the industry by developing new methods for using manufactured homes in a wide array of housing applications, by solving technical challenges, and by paving the way for innovations in home design, construction, and installation. To carry out its mission, MHRA develops, tests, and promotes better methods and materials for designing, manufacturing, and marketing HUD-code homes. These activities include research, new product development, training and educational programs, testing programs and demonstrations, commercialization efforts, workshops, conferences and other events.

Members of MHRA include home manufacturers, retailers and community owners, suppliers, consumers, associations, financial institutions, insurance companies, power suppliers, and other research organizations involved in the manufactured housing industry. Working together, and in partnership with other organizations, members chart the course for MHRA's initiatives and are the catalyst for moving results into practice. Pooling the varied experiences and perspectives of its members, MHRA is able to provide practical, marketable solutions to the challenges and opportunities facing manufactured housing. Manufactured housing is the fastest growing and most vibrant part of the home building industry. Today, one-third of all single-family sales and one-fourth of all new single-family housing starts in the nation are manufactured homes. Demand for manufactured homes continue to grow as more homebuyers and developers recognize that manufactured housing offers quality homes at affordable prices. At the same time, industry continues to seek ways to enhance the value of new manufactured homes. Mr. Levy added that in fostering technological advances and building innovation, the MHRA plays a vital role.

Mr. Levy stated that his organization is similar in nature to the NAHB. The two organizations recognize the importance of international standards issues and how many U.S. building materials and technologies are not recognized in many international markets. The MHRA focuses specifically on the manufactured housing sector and attempts to promote U.S. housing systems in the world-housing sector. The industry clearly recognizes that the United States home construction sector builds to significantly different standards than what are in place in markets like the EU, Japan, China, and Mexico. However, this should not prohibit or limit the United States from competing in these markets if the U.S. firms can technically and architecturally show that domestic products and systems are of quality design and construction.

According to Mr. Levy, the idea of building homes in factories has taken hold in many parts of the world. Factory building is an emerging or growing part of the housing markets in many of the most industrialized nations and often for the same reasons, including: cost efficiency, increased quality, speed of site assembly, etc. In these and other areas, factory building is one of the most promising approaches for meeting the global need for quality, affordable shelter.

Mr. Levy continued by stating that the factors that spur industrialization of housing may be the same across borders, the resulting form of the technology, the market entry point, home design and other aspects that characterize the local form of factory built housing are far from uniform. Worldwide, factory building is differentiated by a rich variety of building methods, materials and degree of automation. Factory building practices have evolved in areas such as Asia, the EU and North America with surprisingly little cross fertilization, despite in some cases, similarities in building practices (for example, the pervasive use of wood framing in both Scandinavia and the U.S./Canada).

As a whole, the international industrialized building community possesses an immense knowledge base of building practices and methods but few opportunities exist to learn from advances pioneered by their counterparts in other countries and continents. As an initial step toward information sharing within the industrialized building community, Mr. Levy informed the attendees that MHRA is sponsoring an international conference on factory building tentatively scheduled for April 2005. The conference will target public and private sector companies and

organizations involved with factory building. Mr. Levy stated that the MHRA is hoping to attract about 30 to 40 foreign government and trade organizations to the summit. He invited DOC and other USG agencies to work his organization in preparation for the summit and welcomed the active participation in the event.

B. Chemicals and Allied Products

Synthetic Organic Chemical Manufacturers Association (SOCMA) - Presenter - James Cooper, (Manager, Government Relations)

Since 1921, the Synthetic Organic Chemical Manufacturers Association (SOCMA) has been the leading trade association representing approximately 300 specialty and batch chemical manufacturers and importers. About 75 percent of SOCMA members are small businesses. The Association promotes innovative, safe and environmentally responsible operations. SOCMA is engaged in a number of industry initiatives to encourage global competitiveness (e.g. SOCMA annually sponsors INFORMEX, the largest chemical trade show in the United States). In addition, it avails its resource to industry partners, governments and other stakeholders to further consensual legislative and regulatory decisions and increase foreign market access.

General Approach to Standards:

Prefer technical or performance-based standards.

Favor transparent standards-setting process based on scientific principles.

Confirm that standards benefit trade as a result of facilitation and acceptance across borders.

Specific Issues of Concern:

Regulatory standards that include criteria such as socio-economic interests, environmental justice, public right to know, etc.

International consensus process, which privileges majority rule and favors the EU, due to its large number of member-states seats.

European influence and its favoring of detailed, prescriptive regulations, and concern that the EU is pushing for international standards that replicate the REACH system (Registration, Evaluation and Authorization of Chemicals)

Desired Government Assistance:

Use trade analysts' expertise to bring macroeconomics perspectives to U.S. negotiating position and balance other U.S. agencies' approach.

Improve country-based information related to specific markets and/or products.

Influence international negotiating process and limit EU's leverage.

The Animal Health Institute - Presenter - Robert C. Livingston, Ph.D., (Director, International Affairs and Regulatory Policy)

The Animal Health Institute (AHI) is the U.S. Trade Association that represents manufacturers of animal care products- the pharmaceuticals, vaccines and feed additives - used to produce a safe supply of meat, milk, poultry and eggs as well as the veterinary medicines that help pets live longer and healthier. AHI interacts with the three federal agencies regulating animal health products: USDA, FDA and EPA. Through AHI, the animal health industry collectively reviews

and responds to regulatory issues. Through the International Federation for Animal Health (IFAH), AHI monitors global food safety regulations as they relate to trade.

General Approach to Standards:

Favor standards based upon transparency, scientific methods, good manufacturing practices

Support international standards-setting bodies such as the Codex Alimentarius and the Veterinary International Cooperation on Harmonization of Technical Requirements for Registration of Veterinary Drugs (VICH).

Approve international harmonization based upon scientific principles and risk-assessments

Specific Issues of Concerns:

Efforts from the European Member States to influence international standards-setting policies through block voting

Safety standards based upon very strict (zero) detection levels, especially in Japan.

Domestic regulations and the need to grant internationally recognized GMP certificates to U.S. vaccine manufacturers.

Concerned about the setting of national Maximum Residue Limits (MRLs); AHI prefers that that tolerance levels be agreed to, internationally.

Desired Government Assistance:

Promote inter-agency effort to integrate food safety standards and trade policy.

Increase inter-agency outreach to other countries

Focus efforts and direct standards-activities in specific fora (e.g. food safety standards should be dealt within Codex as opposed to international organizations such as the OECD or ISO).

Standards-setting procedures have been satisfactory to date, but AHI would like the USG to be vigilant that standards remain science-based and not based on voting as the EU country votes so greatly outnumbers the one U.S. vote

VICH (Veterinary International Cooperation on Harmonization) sets standards, in addition to CODEX. Concern that there is a lack of U.S. commitment to proceed with VICH, would prefer if the USG showed more support.

The Fertilizer Institute - Presenter - William C. Herz, Director of Scientific Programs

The Fertilizer Institute (TFI) is the leading voice in the fertilizer industry, representing producers, retailers and transporters of fertilizers in areas such as: public policy, statistical analysis and public communication. The fertilizer industry has annual revenue of approximately \$10 billion. It has facilities in 34 states that are responsible for approximately 33,000 jobs in the United States. Issues such as security, international trade, energy, transportation, the environment, worker health and safety are central to the mission of TFI and the promotion of its sector.

General Approach to Standards:

Current national and international standards are satisfactory and respond to industry's needs in terms of commercial exchanges.

Support voluntary, technical standards-setting procedures.
Security and standards-setting activities should be dealt with separately, on a case- by- case basis.

Specific Issues of Concern:

Overarching consequences of certain national regulations [such as the EU REACH program] in terms of sectoral competitiveness and market access opportunities.

Coverage of trade metal content in certain fertilizers and standards-setting notifications (China, EU).

Transparency and scientifically based methodology in standards-setting procedures

The fertilizer industry traditionally is linked to food production and self-sufficiency. There is a strong pull for foreign governments to protect their domestic industries through tariffs and more recently, standards-setting requirements.

The EU taxes fertilizers from the United States at a rate of 6%. Fertilizer coming from North Africa is not taxed, thus reducing competitiveness of the industry.

China is one of the primary export markets. However, there is some concern that China is selling their fertilizers after dumping toxic chemicals in fertilizers before they're sold (levels of cadmium were found to be around 6% in one case).

Desired Government Assistance:

Coordinate actions between USG and industry.

Allocate funding to help industry experts participate in conflict-resolution activities.

Seek inter-action and agreement between interested parties at national levels and promote such agreements overseas.

National Paint and Coatings Association - Presenter - Liz A. Johnston, Manager, Special Projects
Environmental, Health, Safety, and International Affairs

Founded in 1888, the National Paint and Coatings Association (NPCA) is a voluntary non-profit industry association, the membership of which is comprised of companies that manufacture consumer paint products and industrial coatings, or that supply raw materials to the coatings industry. The domestic paint manufacturing industry consists of approximately 750 manufacturing companies producing 1.4 billion gallons of paints, resulting in \$14 billion in sales. The industry employs 60,000 people nationwide. NPCA's activities include work in the legislative, regulatory and judicial areas at the federal, state and local levels. NPCA is also providing members with services such as research, statistical information, public information and generic product promotion.

General Approach to Standards:

Favor technical, risk-based standards-setting activities

Support international harmonization with input from all stakeholders, industry, especially SMEs.

Specific Issues of Concerns:

Increased international regulatory actions and cost of implementation to U.S. business (e.g. the Global Harmonized System (GHS))

Harmonization of international rules and decision-making process (consensus versus majority rule)

Lack of transparency in product registration in countries such as China.

Desired Government Assistance:

Help promote transparent, well-informed registration process. Priorities could be given to countries with which we have signed a free trade agreement.

Address issues in trade context using interagency approach, as appropriate.

Limit EU voting influence in fora such as the United Nations and/or the OECD

Make sure that SMEs are full participants in regulatory process (need to lower participation fees and help resolve limited means/availability of experts).

C. Roundtable Discussion

After the association presentations, Mr. Reiley allowed for industry representatives who had chosen to attend the roundtable but declined the offer to present, to comment.

Jennifer Abril, representative of the American Chemistry Council (ACC), considered that the issues presented by the other organizations were similar to concerns raised by ACC's members. Considering the actions of the OECD, she noted that when committees/working groups are providing expertise on very focused matters, the work of the OECD is helpful in reaching international harmonization. The concerns of the industry are that, in the negotiations related to risk management, policy-induced influence tends to grow and the EU uses its solid leverage within the organization. Ms. Abril noted that since numerous organizations are active in the area of chemicals (UN, UNECE, FAO, OECD, ISO, Codex, etc.), it is difficult for the association and its limited resources to respond and carefully monitor all standards-related actions. The ACC is also working actively with China (regulatory expertise and technical assistance) and Japan (reach out activities and comments) to put in place markers and make sure that they have inputs in the regulatory process. ACC's interests remain with developing regulatory policy and standards-setting procedures, which promote innovation and product development.

Isi Siddiqui, representative of Croplife America, reported that his members are concerned about Confidential Business Information in countries stepping up their production such as: India, Brazil, China). While companies are interested in new markets that show promising growth rates, they are facing risks associated with dismal regulatory scheme.

Furthermore, Mr. Siddiqui used the example of a pesticide-related matter in India to express concern for the potential disruption that the global "fishing" of standards may have on trade.

Overall the roundtable was viewed as a success. Industry representatives provided important feedback to ITA.