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Submitted electronically to tricia.vanorden@trade.gov.

September 17, 2013

Ms. Tricia Van Orden
Executive Secretary
President's Export Council
Room 4043
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Ms. Van Orden:

On behalf of ANSAC, please accept these comments in response to the September 3, 2013 notice published in *Federal Register* [FR Doc. 2013-21459] that invites comments on Trade Promotion Authority (TPA) and other topics in advance of the September 19, 2013 meeting of the President's Export Council.

ANSAC, headquartered in Westport, Connecticut, is the international marketing arm for three soda ash (disodium carbonate) manufacturers in the United States: FMC Corporation, OCI Chemicals Corporation and Tata Chemicals North America. Soda ash is a chemical raw material required to manufacture commodities such as glass and detergents. U.S. soda ash is the most competitive and environmentally-friendly in the world due to a unique natural deposit of the soda ash raw material trona located in Green River, Wyoming, from which the U.S. could supply world demand for approximately 1,000 years.

The U.S. industry produces roughly one-fifth of global soda ash output, and due to flat demand for soda ash in the United States, export markets are critical to maintain industry growth. Soda ash is the largest U.S. inorganic chemical export and the industry directly and indirectly accounts for nearly 20,000 jobs in the United States.

The U.S. soda ash industry is an export success story. **The U.S. exported over 50% of its total production for the first time in 2010, and exports exceeded \$1 billion for the first time in 2011.** Due to the critical nature of export markets for the U.S. soda ash industry, ANSAC has been a long-time supporter of free trade and the United States' negotiation of free trade agreements (FTAs).

Granting TPA to the President allows the United States to pursue opportunities to open markets around the world, home to 95% of the customers of U.S. goods. Trade liberalization supports the growth of U.S. exports, jobs and the economy, and the ability of U.S. negotiators to pursue market-opening agreements to reach these goals is essential.

ANSAC has directly benefited from U.S. trade agreements, demonstrated by the growth in soda ash exports to many of the countries with which the United States has concluded FTAs. As shown below, U.S. soda ash exports have increased since the United States has implemented its FTAs with Chile, Australia, Peru, Colombia and DR-CAFTA.



U.S.-Chile FTA

- Soda Ash exports have **increased 169% to \$78 million** since implementation in 2004.



U.S.-Australia FTA

- Soda Ash exports **have increased 178% to \$36 million** since implementation in 2005.



U.S.-Peru Trade Promotion Agreement

- Soda ash exports have **increased 124% to \$21 million** since implementation in 2009.



U.S.-Colombia Trade Promotion Agreement

- Implemented May 2012, soda ash exports have **increased 64% to \$23 million** in the 12-month period ending May 2013 compared to the same period in 2012.



CAFTA-DR

- Exports to CAFTA-DR countries have **increased 12% to \$16 million** since the agreement was fully implemented in 2009.

The Administration and the U.S. Congress previously identified soda ash in multilateral, regional and bilateral trade negotiations as a U.S. government priority. For example, in December 2002, in the context of the WTO Doha Round, USTR proposed that the modalities governing the market access for non-agricultural product negotiations include the elimination of tariffs “as soon as possible but no later than 2010... in the following additional sectors... including soda ash.” (*Emphasis added.*)

Additionally, the February 2002 Senate Finance Committee Report on H.R. 3005, “The Bipartisan Trade Promotion Authority Act of 2002,” emphasized the importance of Administration efforts to negotiate the elimination of tariffs on a reciprocal basis. The Report notes that Section 2(b) of the TPA bill directs the President “to obtain reciprocal tariff and non-tariff barrier elimination agreements, **with particular attention to products covered in Section 111(b) of the Uruguay Round Agreements Act.**” Soda ash is listed among the products referenced in that section.

President Obama is now engaged in significant trade agreement negotiations – the Trans-Pacific Partnership (TPP), which now includes Japan and perhaps will include other countries in the region someday, and the TransAtlantic Trade and Investment Partnership (TTIP) – both which will lower barriers to trade in markets that are crucial to the United States. As negotiators work to complete these deals, it is vital that the President is granted TPA. Trade promotion authority is critical to U.S. trade policy, and the renewal of TPA legislation should be at the forefront of the trade agenda.

Sincerely,

Chris Douville
President and Chief Executive Officer