



White & Case LLP General Trade Report - JETRO

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UNITED STATES

GENERAL TRADE POLICY

US General Trade Policy Highlights

United States Launches WTO Dispute with India Regarding Local Content Policies on Solar Goods

On February 10, 2014, the United States requested WTO consultations with India regarding the local content requirements of India's National Solar Mission (NSM) Program. An announcement by the Office of the United States Trade Representative (USTR) claims that the challenge is necessary to "combat barriers to US clean energy products."

India's NSM Program aims to promote the development of solar power generation facilities in India through a rollout comprising three phases. India launched Phase I in October 2010, and initially required solar power developers using crystalline silicon technology to use certain solar modules manufactured in India. The program subsequently expanded this requirement to include crystalline solar cells. The United States requested WTO consultations with India over these measures in February 2013, but the dialogue failed to address US concerns. According to USTR, bilateral negotiations in the US-India Trade Policy Forum and the US-India Energy Dialogue were equally unproductive.

In October 2013, the Indian government approved measures to implement Phase II of the NSM Program. These measures remain heavily focused on local content requirements and, as was the case under Phase I, solar panel manufacturers must use Indian-manufactured solar cells and modules instead of their imported equivalents. Additionally, Phase II expanded these requirements to include projects employing thin film technology, which Phase I previously excluded.

According to USTR, thin film currently comprises the majority of US solar exports to India, and US producers therefore expect to suffer significant harm from Phase II's rollout. As such, the United States is claiming that the NSM Program violates India's national treatment obligations under GATT Article III:4 and Article 2.1 of the TRIMS Agreement, based on the local content requirements imposed on Indian manufacturers.

The US consultations request is the first step in the WTO dispute resolution process. Unless the parties resolve the matter in 60 days, the United States has the right to request the establishment of a dispute panel to resolve the case.

Click [here](#) for the USTR announcement.

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US Department of Energy Conditionally Grants New License to Export LNG to Non-FTA Partners

The Department of Energy (DOE) announced on February 11, 2014 that it has conditionally authorized Cameron LNG, LLC (“Cameron”) to export from the Cameron LNG Terminal in Cameron Parish, Louisiana domestically produced liquefied natural gas (LNG) to countries with which the United States has not entered into a free trade agreement (FTA). This is the fifth new LNG export terminal approved since 2011.

Section 3 of the Natural Gas Act (15 U.S.C. § 717b) requires DOE approval for all exports of LNG, including exports to countries that have an FTA with the United States. However, exports to non-FTA countries are subject to a discretionary “public interest” test, and DOE may refuse to grant permission to export if it finds that the exports “will not be consistent with the public interest.”

DOE has conditionally authorized Cameron to export LNG at a rate of up to the equivalent of 1.7 billion standard cubic feet per day (Bcf/d) for a period of 20 years. DOE reports to have “conducted an extensive, careful review of the application” and “considered the economic, energy security, and environmental impacts” of the additional exports. In addition, DOE considered public comments for and against the application, and nearly 200,000 public comments relating to the associated analysis of the cumulative impacts of increased LNG exports. Following this review, DOE concluded that exports up to 1.7 Bcf/d for 20 years were “not inconsistent” with the public interest. The license is conditional upon completion of environmental reviews and securing a construction permit from the Federal Energy Regulatory Commission (FERC).

In its announcement, DOE comments that “[t]he development of US natural gas resources is having a transformative impact on the US energy landscape, helping to improve our energy security while spurring economic development and job creation around the country.” DOE further notes that the Energy Information Administration forecasts a record production rate of 72.02 Bcf/d in 2014. DOE commits to continue processing pending applications on a case-by-case basis and monitoring any market developments in light of their possible impact on the public interest.

Please click [here](#) for the DOE announcement and [here](#) for the full conditional authorization.

USTR Creates New Public Interest Trade Advisory Committee

On February 18, 2014, US Trade Representative (USTR) Michael Froman announced the formation of the Public Interest Trade Advisory Committee (PITAC) to provide input to US trade negotiators on issues that impact public health, consumer protection, and development. PITAC will join the Labor Advisory Committee (LAC) as well as the Trade and Environment Policy Advisory Committee (TEPAC) in providing USTR a public interest perspective to US trade policy.¹

¹ Congress created the advisory committee system in 1974 to incorporate US public and private interests in US trade policy formulation. Presently, the system comprises 28 advisory committees, with a membership of approximately 700 advisors.

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Senate Finance Committee Chairman Ron Wyden (D-OR) has welcomed PITAC's creation. Stressing such goals as "transparency, health, and consumer interests," Sen. Wyden affirmed the need for broader public participation in US free trade agreement (FTA) negotiations.

PITAC's genesis is most evident in an October 12, 2010 meeting of the Industry Trade Advisory Committee (ITAC) Chairs. In the transcript, Fanwood Chemical President V.M. Delisi stressed that the Chairs unanimously opposed a proposal to include non-industry representatives on ITACs, instead suggesting a separate committee for NGOs. Mr. Delisi then provided anecdotes for the reasoning; ITAC-3, which covers Chemicals, Pharmaceuticals, Health/Science Products & Services, has previously included representatives of environmental groups, but they "made life very difficult" due to their focus on issues not specific to the sector.

PITAC membership will have access to the negotiating texts of US FTAs, including those of the Trans-Pacific Partnership (TPP) and Transatlantic Trade and Investment Partnership (TTIP). However, this privileged access may require PITAC members to exercise discretion and caution when discussing US FTAs publicly. As a result, PITAC members and their organizations may have to consider these limitations in their public engagement strategies. USTR will issue a Federal Register notice in the near future inviting NGOs, academics, and other public interest groups to apply for PITAC membership.

Click [here](#) for the USTR fact sheet and [here](#) for ITAC meeting transcript.

United States Requests WTO Compliance Panel over Chinese AD/CVD Duties on US Exports of Grain Oriented Flat-Rolled Electrical Steel

On February 13, 2014, the United States requested the establishment of a panel to examine China's compliance with the WTO's ruling in *China - Countervailing and Anti-Dumping Duties on Grain Oriented Flat-Rolled Electrical Steel from the United States* (DS 414). Previously, a WTO panel and the Appellate Body concluded that Chinese antidumping (AD) and countervailing duty (CVD) determinations on imports of US grain oriented flat-rolled electrical steel (GOES) were inconsistent with the WTO Anti-Dumping Agreement (ADA). Although bilateral consultations took place on January 24, 2014, the United States and China were not able to **resolve**.

On January 31, 2013, China completed its AD/CVD re-determination with respect to US GOES imports and decreased the applicable AD/CVD duties. However, the United States considers that the re-determinations remain inconsistent with China's WTO obligations. The United States is arguing that (i) China's analyses of price effects in the domestic market, as well as the causal relationship between US GOES imports and injury, were not objective or based on positive evidence; (ii) China failed to conduct a "non-attribution analysis" to determine the extent other factors caused injury; and (iii) China failed to comply with disclosure and publication requirements.

The United States' panel request has been placed on the agenda for the next monthly meeting of the DSB, scheduled for February 26, 2014. The United States and China previously agreed that, at the first DSB meeting where the United States makes a request for a compliance panel in this dispute,

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China will accept its establishment. As a result, once the United States makes the request at the DSB meeting, the DSB will establish a panel.

Please click [here](#) for the United States panel request and [here](#) for a flow chart on the WTO dispute settlement process.

USTR Releases 2013 Special 301 Out-of-Cycle Review of Notorious Markets

On February 12, 2014, the Office of the United States Trade Representative (USTR) released the 2013 Out-of-Cycle Review of Notorious Markets (“2013 Review”). According to USTR Froman, the notorious markets highlighted in the 2013 Review “unfairly take from [] American workers, diminishing the value and salability of their work and threatening their jobs.” USTR Froman also warned that “some of the counterfeit goods sold in the identified physical markets, from medicines and personal care products to automotive parts, can even threaten the health and safety of consumers.” The Special 301 Out-of-Cycle Review of Notorious Markets serves as a complement to the annually-published Special 301 Report.

Pursuant to Section 182 of the Trade Act of 1974, as amended by the Omnibus Trade and Competitiveness Act of 1988 and the Uruguay Round Agreements Act (enacted in 1994), USTR publishes a “Special 301 Report” (“Report”) in April of every year. The Report reviews the state of intellectual property rights (IPR) protection and enforcement in a number of countries other than the United States. USTR began to publish a Notorious Market List within the Report in 2006. In 2010, USTR announced that it would begin publishing this list in a separate document known as the “Special 301 Out-of-Cycle Review of Notorious Markets.”

The 2013 Review is the fourth of such Reviews; USTR published the first review in February 2011, and subsequent reviews in December 2011 and December 2012. USTR published a Federal Register (FR) notice on September 20, 2013, requesting submissions from the public identifying potential internet and physical notorious markets that exist outside the United States for inclusion in the 2013 Review. According to USTR, the 2013 Review only identifies “particularly infamous markets, and does not constitute an exhaustive list of all markets dealing in pirated or counterfeit goods around the world.” Furthermore, it “does not purport to reflect findings of legal violations, nor does it reflect the United States Government’s analysis of the general IPR protection and enforcement climate in the country concerned.”

The 2013 Review identifies 34 online and physical marketplaces, all of which reportedly engage in and facilitate substantial piracy and counterfeiting. The 23 online market places identified broadly provide online streaming or download capacity with respect to pirated music, video games, television programs, online books, and software, or otherwise facilitate unauthorized use of protected content. The 2013 Review also identifies a Russian social networking website which enables “the unauthorized reproduction and distribution, including streaming, of music and other content through the site and associated software applications.”

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The 2013 Review identifies 11 physical markets (Argentina, China, Colombia, Ecuador, India, Indonesia, Mexico, Paraguay, Spain, Thailand and Ukraine), most of which have more than one market of particular concern to USTR. USTR has removed from the 2013 Review several online markets previously listed in the 2012 Review. According to USTR, after being listed in the 2012 Review, several online markets closed or saw their business models disrupted as a result of enforcement efforts. The markets removed from the 2012 Review include: (i) the Canada-based website “IsoHunt.com”; and (ii) the Chinese platforms “GouGou.com”, “Warez-bb.org”, “PaiPai.com”, “Taobao.com” and “Baidu.com.” USTR also removed the following physical markets from the list: (i) Pakistani book pirates at the Urdu Bazaars; (ii) Mexico’s Pulga Rio Market. The 2013 Review notes that USTR continues to monitor removed markets in order to determine whether to re-list them in the next Review.

Click [here](#) to access the 2013 Review.

ITA Expands ITAC Membership Eligibility to Include Labor Unions

For the first time, private committees advising the US government on international trade matters will be open to labor union representatives. On February 24, 2014, the International Trade Administration (ITA) published in the Federal Register a notice requesting applications for membership in the 16 Industry Trade Advisory Committees (ITACs). ITACs, comprising appointed industry representatives, provide private sector input on US negotiating positions in multilateral, bilateral, and regional trade negotiations, as well as other trade-related policy matters. The charter of each ITAC is renewed every four years, at which time all members’ appointments are subject to renewal. This round of ITAC membership will extend from March 2014 to February 2018, and committee members will therefore have the opportunity to play a key advisory role in the completion of the Trans-Pacific Partnership (TPP) and Transatlantic Trade and Investment Partnership (TTIP).

The Office of the United States Trade Representative (USTR) and the ITA will select ITAC members. For 2014-2018, the ITA has formally extended ITAC membership eligibility to include representatives of “labor unions.” This represents a shift from previous practice, whereby USTR and Department of Labor (DOL) organized labor union input in the form of the Labor Advisory Committee (LAC). Although previous ITAC membership rules did not explicitly exclude labor union representatives, USTR and ITA did not select labor union representatives to serve as members of ITACs, and the committees were comprised of corporate representatives.

AFL-CIO President Richard Trumka welcomed this extension of ITAC membership. Nevertheless, according to Trumka, the AFL-CIO will “continue to press for greater openness, accountability, and democracy throughout the trade negotiation process.” LAC members cannot participate in ITAC deliberations or any related ad hoc working groups. As a result, labor unions have long criticized the ITAC structure on the basis that it isolates labor interests from US trade policymaking, and that it serves as “a tool to secure corporate rights.”

The implications of the ITAC’s expansion of membership eligibility are not immediately clear. The tension between corporate and labor interests may pose short-term challenges to the efficacy of the

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ITACs. Nonetheless, ITA's move is consistent with the Obama Administration's broader push to make US trade negotiations more transparent. Beyond the ITACs, USTR Michael Froman announced on February 18, 2014 the Obama Administration's intention to create a new trade advisory entity made up of representatives from "public interest" groups. The new Public Interest Trade Advisory Committee (PITAC) will join the LAC as well as the Trade and Environment Policy Advisory Committee (TEPAC) in providing USTR a public interest perspective to US trade policy.

Click [here](#) for the Federal Register notice, [here](#) for the list of 16 ITACs, and [here](#) for the AFL-CIO press statement.

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FREE TRADE AGREEMENTS

Free Trade Agreement Highlights

TPP Ministers Hold Talks in Singapore; Bilateral Market Access Talks Lagging in Progress

Trade Ministers of the Trans-Pacific Partnership (TPP) Parties met in Singapore from February 22-25, 2014 to discuss potential compromises and options for outstanding issues in the TPP negotiations. Although TPP Ministers agreed on undisclosed steps to arrive at so-called “landing zones,” Malaysia’s Ministry of International Trade and Industry (MITI) emphasized, “there is still a lot of work to be undertaken [and] negotiators will be consulting on a suitable timetable to continue work with a view to find a solution to the remaining issues.”

During the four-day long negotiations, TPP Ministers focused on both market access commitments and the draft text of the agreement. For market access negotiations, the concurrent bilateral and plurilateral approach appears to present a persistent obstacle to the conclusion of talks. Under the bilateral approach adopted by the United States, US negotiators will only negotiate bilateral tariff reduction schedules with TPP partner countries with which a bilateral free trade agreement (FTA) does not exist, thus leaving existing bilateral FTA commitments intact. In that respect, the most widely regarded obstacle in the bilateral channel remains the US-Japan parallel negotiations, where the United States has publicly expressed that Japanese offers on autos and agriculture do not meet expectations.

With respect to negotiations on the draft text, the TPP Parties acknowledged that significant gaps remain in the areas of intellectual property rights (IPR), state-owned enterprises (SOEs), and environment. However, TPP Parties have reportedly finalized eight chapters, namely (i) development; (ii) regulatory coherence; (iii) competitiveness and business facilitation; (iv) small- and medium-enterprises (SMEs); (v) temporary entry; (vi) cooperation and capacity building; (vii) administrative and institutional arrangements; and (viii) a certain section of competition policy. This leaves 21 chapters for negotiation.

For those issues outstanding, the following developments are of note:

- **SOEs.** TPP Ministers reportedly agreed to reduce the scope of SOE disciplines, and limit disciplines imposed on SOEs providing services to home markets. Furthermore, several TPP Parties are taking more seriously the notion that SOEs may play a pivotal role in different national growth strategies. Nevertheless, it remains unclear how this will affect the degree of flexibility and carve-outs granted to SOEs in the final text, as well as the country-specific approach favored by some TPP Parties;
- **Textiles.** TPP Parties reportedly remain in disagreement on the textiles short supply list (SSL) and appropriate rules of origin. The SSL refers to the list of textile inputs that manufacturers can source from outside the TPP region for use in qualifying apparel. TPP Parties continue to

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disagree over the number of products in the SSL, and whether the listings will be temporary or permanent in nature;

- **Environment.** A leaked proposal allegedly from US negotiators dated February 14, 2014 proposes changes to the TPP Parties' commitments on climate change measures, including commitments on the United Nations Framework Convention on Climate Change (UNFCCC) process and fossil fuel subsidies. The proposal suggests restructuring Article 15 on "Trade and Climate Change" to "Transitions to a Low-Emissions Economy," and there would be no specific benchmarks to meet or institutional enforcement mechanisms to achieve compliance.

Progress in TPP negotiations remains slow and steady, with TPP Parties largely attempting to achieve compromises and identify possible flexibilities at this stage. MITI Minister Mustapa Mohamed stresses, "There is a lot of optimism but I would like to temper the optimism with some realism in terms of the amount of work that needs to be done." TPP Parties have not specified when and where negotiators will meet for the next round of negotiations.

Considering the political nature of the outstanding issues, US President Barack Obama's April trip to Asia may alleviate some pressure on negotiators and reassure TPP Parties of the United States' investment in the TPP as the lynchpin of its increased economic engagement in the Asia-Pacific. President Obama will travel to two TPP economies, Japan and Malaysia, as well as Korea and the Philippines, potential TPP entrants.

In addition to TPP, the US Congress' deliberations regarding Trade Promotion Authority (TPA) will likely be an additional focus of bilateral discussions. There is a prevailing, if not growing, sense amongst TPP Parties that TPA is crucial for the United States to ratify TPP in its final form and remain consistent with its negotiating positions so far, e.g. leaving discussion on currency disciplines to other multilateral fora. The stalemate in Congress on the TPA Bill and division within the Democratic Party on both TPA and TPP will likely further compel President Obama to assuage concerns of the United States' political commitment to trade. Therefore, President Obama's Asia trip is an important opportunity to achieve consensus and confidence at the highest levels, and energize efforts to conclude TPP negotiations by the end of 2014.

Click [here](#) for the TPP Ministers' Joint Statement.

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CUSTOMS

Customs Highlights

New Executive Order Aims to Streamline Export-Import Processes

On February 19, 2014, President Obama signed an Executive Order (EO) to develop a new trade-processing infrastructure in support of the United States' trade facilitation goals. The EO on "Streamlining the Export/Import Process for America's Businesses" contains a series of interlocking measures to reduce processing and approval times for US businesses that export goods and services. According to the Obama Administration fact sheet, the EO aims to hasten the shipment of US goods overseas, eliminate duplicative paperwork, and streamline government processes.

The highlights of the EO are summarized as follows:

- **International Trade Data System (ITDS).** The ITDS is an electronic information exchange capability, also known as "single window," through which businesses will transmit data required by participating agencies for the importation and exportation of goods. The EO mandates the completion of ITDS and related requirements by December 31, 2016. Once its implementation, participating agencies will employ the ITDS as the primary platform to receive from users a standard set of data for the release and clearance of goods;
- **Border Interagency Executive Council (BIEC).** The BIEC is an interagency working group, which the Secretary of Homeland Security will chair to develop policies and processes to enhance coordination across relevant agencies, including the Departments of Commerce, Agriculture, Transportation, and others with border management interests. Moreover, the EO tasks the BIEC with encouraging other countries to develop similar single window systems to facilitate data-sharing across agencies and with trading partners;
- **Regulatory Review and Reports.** To operationalize the ITDS, the EO requires participating agencies to determine the need for regulatory modifications, and promptly initiate efforts to do so. In the time leading up to the ITDS **launch** deadline, the BIEC, in consultation with the Board, will update the President on the ITDS preparations by July 1, 2014, and every year thereafter until July 2016.

USTR Froman has welcomed the EO, affirming that its measures are consistent with WTO's new trade facilitation agreement of December 2013. The agreement broadly commits WTO Members to expedite the movement, release, and clearance of goods, as well as to improve cooperation on customs matters. Once fully implemented, the ITDS aims to reduce the cost of trade by reducing administrative burdens, standardizing reporting requirements, and streamlining processes.

According to the Department of Homeland Security (DHS), the first phase of the ITDS implementation efforts will begin in Spring 2014 to test preliminary technical capabilities for imports

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at select locations and with pre-identified industry partners. The second phase will take place in Spring 2015 and will include both imports and exports, as well as an expanded range of capabilities and industry users.

Click [here](#) for the EO, [here](#) for the fact sheet, and [here](#) for USTR Froman's remarks.

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