



June 06, 2018

European Commission
Directorate-General for Trade
Brussels Belgium
Cecilia Malmström, Commissioner for Trade

Dear Commissioner Malmström,

The Global Pulse Confederation (GPC) represents 23 National Federations and over 600 private sector members active in the global pulse industry. The industry is worth over \$100 billion at the retail level.

The GPC and other private sector signatories below are writing to express our concerns about the European Commission's increase in duties on pulses imported from the U.S., specifically beans (HS 07133310, 07133390).

Although we are aware that the World Trade Organization (WTO) has been officially notified of the EU's list of retaliatory tariffs, we urge the European Commission to reconsider the proposed tariff increase on pulses of any kind for several reasons.

First, notification states that measures should not be introduced on products where the EU is "substantially dependent for its supply" on the U.S. With this in mind, the GPC would like to highlight the strategic importance of U.S. pulse imports to the EU, which the European Commission has noted in discussions for possible Protein Strategy for Europe.

Second, the proposed tariff increase will have a negative impact on the health and wellbeing of European consumers. Pulses are an excellent, affordable source of plant-based protein and fibre that are rich in minerals, vitamin B, and antioxidants. As extensive research on the Mediterranean diet has shown, regular consumption of pulses can play an important role in addressing and preventing diabetes, cardiovascular disease, and certain cancers.

At a time when European Union Member States face [alarming increases in childhood obesity levels](#) we strongly encourage the European Commission to help foster the consumption of traditional foods, including pulses, that play a key role in maintaining a healthy weight. Instead of pulses, perhaps the European Commission could consider targeting tariff increases for products that are negatively impacting consumer health and increasing the burden on European healthcare providers.

Third, both packagers and food processors depend upon reasonably priced pulses to meet the needs of their customers. If implemented, the proposed tariff increase will raise costs and negatively impact choice for European consumers. Higher prices and fewer choices lead to decreased consumption.

Fourth, pulses play a key role as an environmentally-friendly, sustainable crop that helps address growing concerns about climate change. As nitrogen fixing plants, pulses enhance soil fertility and improve yields of rotation crops. Pulses also have a very low water and

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carbon footprint compared with other protein sources. Thus, from an environmental standpoint, the European Commission should also be encouraging the production and consumption of pulses.

Lastly, should a decision to increase the tariff on pulses be taken, we ask that it be done in a fair, effective, and transparent manner. As such we urge the European Commission to proactively initiate consultation with the Member States via the Trade Barriers Committee on the forthcoming Implementing Act.

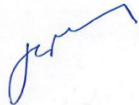
Implementation must ensure that in-transit (en route) shipments be subject to the tariff in effect at the time of the signing of the contract. This would help ensure legal certainty and limit market disruption. Clear and timely signposting of the application deadlines of the new regime is also essential in this regard.

In respect to the strategic importance of pulse imports from the U.S. we request that due consideration be given to a moratorium and/or a phased implementation of the tariffs to ensure secure adaption of the pulses supply chain. Finally, should the U.S. decide to reduce the scope of its tariffs we request that the removal of pulses from the retaliatory list be prioritized.

The GPC, private sector members and federations listed below all support the contents of this letter. We would welcome the opportunity for further discussion at your convenience.

Thank you for your consideration.

Yours sincerely,



Huseyin Arslan
President
Global Pulse Confederation

Co-signatories:

European Assoc. of Fruit & Vegetable Producers (PROFEL)	Aline Rutsaert	EU
Grain and Feed Trade Association (GAFTA)	Jaine Chisolm Caunt	EU
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COROOS Conserven BV	Wim Scheefhals	Netherlands
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